Chapter 6 Project Alternatives

Section 15126.6 of the CEQA Guidelines requires that an Environmental Impact Report (EIR) describe a range of reasonable alternatives to the proposed project or to the proposed project location that would feasibly attain most of the project objectives but would avoid or lessen any significant environmental impacts. An EIR should evaluate the environmental impacts of the alternatives compared to the proposed project. This chapter of the EIR describes and evaluates alternative land use maps and is intended to implement the requirements set forth in the CEQA Guidelines. This chapter also identifies the Environmentally Superior Alternative as required by CEQA Guidelines Section 15126.6(e)(2). The requirements of Section 15126.6 of the CEQA Guidelines pertaining to the alternatives analysis are summarized below.

The following discussion covers a reasonable range of feasible alternatives that focuses on avoiding or substantially lessening any significant effects of the proposed project, even if these alternatives would not attain all of the project objectives or would be more costly, and is designed to foster meaningful public participation and informed decision-making. The discussion focuses on alternatives to the project that are capable of meeting most of the project objectives, identified in Chapter 3, Project Description, of this EIR. According to the CEQA Guidelines, there are many factors that may be taken into account when addressing the feasibility of alternatives, such as environmental impacts, site suitability as it pertains to various land use designations, economic viability, availability of infrastructure, regulatory limitations, and jurisdictional boundaries. Also, the alternatives analysis need not be as detailed as that conducted for the proposed project. A No Project Alternative is required to be included in the range of alternatives. An EIR need not consider an alternative whose effects cannot be reasonably identified, whose implementation is remote or speculative, or one that would not achieve most of the basic project objectives. Finally, the Environmentally Superior Alternative shall be identified and if it is the No Project Alternative, the next Environmentally Superior Alternative shall be identified.

The alternatives analysis below meets the requirements of CEQA Guidelines Section 15126.6. The analysis includes sufficient information about each alternative to provide meaningful evaluation, analysis, and comparison with the proposed project.

6.1 Project Objectives

Objectives for the proposed project are as follows:

1. Establish General Plan boundaries that allow for the planning of quality, managed and sustainable growth, while meeting the housing needs of existing and future residents during the General Plan's planning horizon (year 2035).
2. Maintain residential densities in outlying areas to accommodate growth, preserve and enhance existing neighborhoods, guide additional growth towards downtown and along key transportation corridors and improve circulation and safety for vehicles and pedestrians.
3. Maintain areas for high quality, diversified and employee-intensive industrial, retail, technology, manufacturing and service-oriented businesses that create and sustain a strong economic base and provide opportunities for the full employment of a diverse set of skills.
4. Create an economically viable urban downtown and urban core with exciting activities and unique land uses that attract local residents and tourists, such as retail, office, residential, entertainment and cultural uses.
5. Achieve a sustainable and integrated system of land use and transportation in the City in a manner that will:
    a. Significantly decrease overall community consumption, specifically the consumption of non-local, non-renewable and non-recycled materials, water, and energy and fuels.
    b. Within renewable limits, encourage the use of local, non-polluting, renewable and recycled resources (water, wind, solar and geothermal energy and material resources).
    c. Create a multi-modal transportation system that minimizes and, where possible, eliminates pollution and motor vehicle congestion while ensuring safe mobility and access for all without compromising the ability to protect public health and safety.
    d. Facilitate a reduction in automobile dependency in favor of affordable alternative, sustainable modes of travel.
    e. Implement land use and transportation planning and policies to foster compact, mixed use projects, forming urban villages designed to maximize housing choices and encourage walking, bicycling and the use of existing and future public transit systems.
    f. Encourage residents to recognize that they share the local ecosystem with other living things that warrant respect and responsible stewardship.
6. Provide a list of specific actions that will reduce Greenhouse Gas (GHG) emissions, with the highest priority given to actions that provide the greatest reduction in GHG emissions and benefits to the community at the least cost, while establishing a qualified reduction plan from which future development within the City can tier.

6.2 Alternatives Considered but Rejected

The alternatives that can be considered for the proposed project, which address the future growth of the proposed project area, are countless. However, as a result of the comprehensive planning process for the proposed project, a range of alternatives that are "reasonable" for analysis has been defined by the City and are discussed below in Section 6.3, Alternatives Analyzed. The following section describes those alternatives or alternative concepts that were given consideration by the City but rejected from further analysis in the EIR.

- **Elimination of Valley View Specific Planning Area (SPA) from the General Plan Update Planning Area Boundary.** This alternative was rejected in order to preserve the City's opportunity to accommodate above-moderate income housing and establish a potential resort facility that would attract visitors and revenue to the City. Retaining the Valley View SPA in the General Plan Update also satisfies the goal to preserve residential densities and intensities in outlying areas, in addition to supplementing additional housing in the urban core, in order to maximize housing options for existing and future residents.

- **Retention of the Del Dios Area in the General Plan Update Planning Area Boundary.** This alternative was rejected in recognition of the Del Dios Area's remoteness, orientation away from Escondido's traffic and drainage patterns, and separation of the community from the developed portions of the General Plan Update planning area. Residential preferences expressed at neighborhood meetings indicated a collective desire to be excluded from the General Plan Update boundary. In addition, the area's lack of infrastructure and need for costly improvements to adequately serve the area was a significant factor in the decision not to retain the Del Dios community within the General Plan Update planning area boundary. Excluding this area from the General Plan Update planning area boundary allows the City to focus development and infrastructure improvements in the City's urban core area.

- **Land Use Designations Consistent with the 2011 County General Plan.** This alternative was rejected in order to preserve existing land use development patterns and the community character of the unincorporated areas surrounding Escondido. In certain unincorporated areas of the County's General Plan, land use intensities are higher than the City's, but are developed at intensities consistent with the Escondido General Plan. In other areas of the County's General Plan the land use intensities are lower than the City's and are vacant and/or under developed. A goal of the Escondido General Plan Update is to preserve established densities and intensities in areas surrounding the community's urban core, consistent with smart growth principles, while maintaining adequate opportunities for housing options to meet all income levels. Rather than changing land use designations in these outlying areas, the Escondido General Plan Update would maintain densities and intensities, which also reflects residents' preferences as expressed during various community meetings.

- **Inclusion of Residential Development in the Westfield Shoppingtown Target Area.** This alternative was rejected in order to maintain maximum flexibility for possible future non-residential regional entertainment and employment uses. Given the area's strategic location along I-15, with a direct access ramp and existing and future transit connections, the site is appropriate for intensification. Currently, the nearest residential land uses to the Westfield

Shoppingtown Target Area are more than one-quarter mile away. Future residential uses on the site could pose compatibility challenges with possible future land uses (i.e. noise, lighting, hours of operation, etc.). Retaining the site for non-residential land uses allows greater flexibility in land use planning and the General Plan Update to concentrate future residential development in the downtown and urban core areas.

6.3 Alternatives Analyzed

The following section presents an evaluation of four alternatives to the proposed project: 1) No Project Alternative; 2) Reduced Employment Alternative; 3) Reduced Residential Alternative; and 4) Blended Reduced Downtown/Focused Smart Growth and Employment Alternative. For each alternative, a brief description is provided, followed by a summary impact analysis relative to the proposed project, and an assessment of the degree to which the alternative would meet the proposed project's objectives. Table 6-1, Comparison of Alternatives – Environmental Issues, provides a comparison of the significant direct impacts of the proposed project and alternatives. Table 6-2, Comparison of Alternatives – Proposed Project Objectives, provides a summary of the ability of the project alternatives to meet the proposed project objectives.

6.3.1 No Project Alternative

CEQA requires a No Project Alternative to be addressed in an EIR. Under the No Project Alternative, it is assumed that the proposed project, including General Plan Update, Downtown Specific Plan Update and Climate Action Plan, would not be adopted or implemented and the currently adopted City of Escondido General Plan (1990) would be the applicable planning document for the proposed project area. Development and redevelopment would continue to occur in the proposed project area under the existing General Plan; however, when compared to the proposed project, this alternative would not incorporate higher density development in the downtown and urban core area, accommodate greater residential, commercial and industrial development in the 15 project study areas or implement smart growth concepts. Under the No Project Alternative, land use designations within the proposed project area would occur as designated in the adopted General Plan. Build-out conditions for the No Project Alternative are identified in Table 3-3, General Plan Update Study Areas, of Chapter 3, Project Description. As shown in this table, the No Project Alternative would accommodate 6,336 fewer dwelling units and approximately 5,000,000 square feet (sf) less employment land uses than the proposed project. This alternative would continue to implement the Circulation Plan identified in the existing General Plan and would not update the local roadway network as identified in the proposed Mobility and Infrastructure Element of the General Plan Update.

Table 6-1 Comparison of Alternatives – Environmental Impacts

	Proposed Project		Alternatives to the Proposed Project						
Issue Areas	**Without Mitigation**	**With Mitigation**	**No Project**	**Reduced Employment**	**Reduced Residential**	**Blended Reduced Downtown /Focused Smart Growth and Employment**	**~~Circulation~~ Mobility and Infrastructure Element Downtown Couplet**	**Promenade Retail Center and Vicinity**	**Nutmeg Street**
4.1 Aesthetics									
Scenic Vistas	LS	LS	○	○	○	○	—	—	—
Scenic Resources	LS	LS	○	○	○	○	—	—	—
Visual Character or Quality	LS	LS	○	○	○	○	—	—	—
Lighting and Glare	LS	LS	○	○	○	○	—	—	—
4.2 Agricultural Resources									
Direct Conversion of Agricultural Resources	LS	LS	○	○	○	○	—	—	—
Land Use Conflicts	LS	LS	—	—	—	—	—	—	—
Indirect Conversion of Agricultural or Forest Resources	LS	LS	○	○	○	○	—	—	—
4.3 Air Quality									
Air Quality Plans	LS	LS	—	—	—	—	—	—	—
Air Quality Violations	S	SU	▼	▼	▼	▼	▲	▲	▲
Sensitive Receptors	S	LS	▼	▼	▼	▼	▲	▲	▲
Objectionable Odors	LS	LS	○	—	—	—	—	—	—

▲ Alternative is likely to result in greater impacts to issue when compared to proposed project.
— Alternative is likely to result in a similar impacts to issue when compared to proposed project.
▼ Alternative is likely to result in less impacts to issue when compared to proposed project, however, impacts would still be significant before and/or after mitigation.
○ Alternative is likely to result in less impacts to issue when compared to proposed project and impacts would be less than significant and not require mitigation.
S Significant Impact
LS Less Than Significant Impact
SU Significant and Unavoidable Impact

Table 6-1 continued

Issue Areas	Proposed Project		Alternatives to the Proposed Project						
	Without Mitigation	With Mitigation	No Project	Reduced Employment	Reduced Residential	Blended Reduced Downtown /Focused Smart Growth and Employment	~~Circulation~~ Mobility and Infrastructure Element Downtown Couplet	Promenade Retail Center and Vicinity	Nutmeg Street
4.4 Biological Resources									
Special Status Plant and Wildlife Species	S	SU	▼	▼	▼	▼	—	—	—
Riparian Habitat and Other Sensitive Natural Communities	S	SU	▼	▼	▼	▼	—	—	—
Federally Protected Wetlands	LS	LS	—	—	—	—	—	—	—
Wildlife Movement Corridors and Nursery Sites	S	SU	▼	▼	▼	▼	—	—	—
Local Policies and Ordinances	LS	LS	—	—	—	—	—	—	—
HCP and NCCP	LS	LS	—	—	—	—	—	—	—
4.5 Cultural Resources									
Historical Resources	S	LS	▼	▼	▼	▼	—	—	—
Archaeological Resources	S	LS	▼	▼	▼	▼	—	—	—
Paleontological Resources	LS	LS	—	—	—	—	—	—	—
Human Remains	LS	LS	—	—	—	—	—	—	—
4.6 Geology and Soils									
Exposure to Seismic Related Hazards	LS	LS	—	—	—	—	—	—	—
Soil Erosion or Topsoil Loss	LS	LS	—	—	—	—	—	—	—
Soil Stability	LS	LS	—	—	—	—	—	—	—
Expansive Soils	LS	LS	—	—	—	—	—	—	—
Waste Water Disposal Systems	LS	LS	—	—	—	—	—	—	—

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Table 6-1 continued

Issue Areas	Proposed Project		Alternatives to the Proposed Project						
	Without Mitigation	With Mitigation	No Project	Reduced Employment	Reduced Residential	Blended Reduced Downtown /Focused Smart Growth and Employment	~~Circulation~~ Mobility and Infrastructure Element Downtown Couplet	Promenade Retail Center and Vicinity	Nutmeg Street
4.7 Greenhouse Gas Emissions									
Compliance with AB 32	LS	LS	▲	—	—	—	—	—	—
Potential Effects of Global Climate Change	LS	LS	▲	—	—	—	—	—	—
4.8 Hazards and Hazardous Materials									
Transport, Use, and Disposal of Hazardous Materials	LS	LS	—	—	—	—	—	—	—
Accidental Release of Hazardous Materials	LS	LS	—	—	—	—	—	—	—
Hazards to Schools	LS	LS	—	—	—	—	—	—	—
Existing Hazardous Materials Sites	LS	LS	—	—	—	—	—	—	—
Public Airports	LS	LS	—	—	—	—	—	—	—
Private Airports	LS	LS	—	—	—	—	—	—	—
Emergency Response and Evacuation Plans	LS	LS	—	—	—	—	—	—	—
Wildland Fires	LS	LS	▲	—	—	—	—	—	—
4.9 Hydrology and Water Quality									
Water Quality Standards and Requirements	LS	LS	—	—	—	—	—	—	—
Groundwater Supplies and Recharge	LS	LS	—	—	—	—	—	—	—
Erosion or Siltation	LS	LS	—	—	—	—	—	—	—
Flooding	LS	LS	—	—	—	—	—	—	—
Exceed Capacity of Stormwater Systems	LS	LS	—	—	—	—	—	—	—

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Table 6-1 continued

Issue Areas	Proposed Project		Alternatives to the Proposed Project						
	Without Mitigation	With Mitigation	No Project	Reduced Employment	Reduced Residential	Blended Reduced Downtown /Focused Smart Growth and Employment	~~Circulation~~ Mobility and Infrastructure Element Downtown Couplet	Promenade Retail Center and Vicinity	Nutmeg Street
Housing within a 100-year Flood Hazard Area	LS	LS	—	—	—	—	—	—	—
Dam Inundation and Flood Hazards	LS	LS	—	—	—	—	—	—	—
Seiche, Tsunami, and Mudflow Hazards	LS	LS	—	—	—	—	—	—	—
4.10 Land Use									
Physical Division of an Established Community	LS	LS	—	—	—	—	—	—	—
Conflicts with Land Use Plans, Policies, and Regulations	LS	LS	—	—	—	—	—	—	—
Conflicts with HCPs or NCCPs	LS	LS	—	—	—	—	—	—	—
4.11 Mineral Resources									
Mineral Resource Availability	LS	LS	—	—	—	—	—	—	—
Mineral Resource Recovery Sites	LS	LS	—	—	—	—	—	—	—
4.12 Noise									
Excessive Noise Levels	LS	LS	▼	▼	▼	▼	—	▲	▲
Excessive Groundborne Vibration	S	SU	▼	▼	▼	▼	—	▲	▲
Permanent Increase in Ambient Noise Levels	LS	SU	▼	▼	▼	▼	—	▲	▲
Temporary Increase in Ambient Noise Levels	LS	LS	▼	▼	▼	▼	—	▲	▲
Excessive Noise Exposure from a Public or Private Airport	LS	LS	—	—	—	—	—	—	—

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Table 6-1 continued

Issue Areas	Proposed Project		Alternatives to the Proposed Project						
	Without Mitigation	With Mitigation	No Project	Reduced Employment	Reduced Residential	Blended Reduced Downtown /Focused Smart Growth and Employment	~~Circulation~~ Mobility and Infrastructure Element Downtown Couplet	Promenade Retail Center and Vicinity	Nutmeg Street
4.13 Population and Housing									
Population Growth	LS	LS	—	—	—	—	—	—	—
Displacement of Housing and People	S	SU	○	▼	—	—	—	—	—
4.14 Public Services									
Fire Protection Services	LS	LS	—	▼	▼	▼	—	▲	▲
Police Protection Services	LS	LS	—	▼	▼	▼	—	▲	▲
School Services	LS	LS	—	—	▼	▼	—	—	—
Other Public Services	LS	LS	—	—	▼	▼	—	—	—
4.15 Recreation									
Deterioration of Parks and Recreational Facilities	LS	LS	—	—	▼	▼	—	—	—
Construction of New Recreational Facilities	LS	LS	—	—	▼	▼	—	—	—
4.16 Transportation and Traffic									
Traffic and Level of Service Standards	S	SU	▼	▼	▼	▼	▲	▲	▲
Air Traffic Patterns	LS	LS	—	—	—	—	—	—	—
Road Safety	LS	LS	—	—	—	—	▲	—	—
Emergency Access	LS	LS	—	—	—	—	▲	—	—
Alternative Transportation	LS	LS	—	—	—	—	▲	—	—

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Table 6-1 continued

Issue Areas	Proposed Project		Alternatives to the Proposed Project						
	Without Mitigation	With Mitigation	No Project	Reduced Employment	Reduced Residential	Blended Reduced Downtown /Focused Smart Growth and Employment	~~Circulation~~ Mobility and Infrastructure Element Downtown Couplet	Promenade Retail Center and Vicinity	Nutmeg Street
4.17 Utilities and Service Systems									
Wastewater Treatment Requirements	LS	LS	—	▼	▼	▼	—	—	—
New Water or Wastewater Treatment Facilities	LS	LS	—	▼	▼	▼	—	—	—
Sufficient Stormwater Drainage Facilities	LS	LS	—	▼	▼	▼	—	—	—
Adequate Water Supplies	S	SU	—	▼	▼	▼	—	—	—
Adequate Wastewater Facilities	LS	LS	—	▼	▼	▼	—	—	—
Sufficient Landfill Capacity	S	SU	—	▼	▼	▼	—	—	—
Solid Waste Regulations	LS	LS	—	▼	▼	▼	—	—	—
Energy	LS	LS	—	▼	▼	▼	—	—	—

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Table 6-2 Comparison of Alternatives - Proposed Project Objectives

Proposed Project Objectives	Ability of Alternatives to Meet Proposed Project Objectives						
	No Project	Reduced Employment	Reduced Residential	Blended Reduced Downtown/Focused Smart Growth and Employment	~~Circulation~~ Mobility and Infrastructure Element Downtown Couplet	Promenade Retail Center and Vicinity	Nutmeg Street
Objective 1: The establishment of General Plan boundaries that allow for the planning of quality, managed and sustainable growth, while meeting the housing needs of existing and future residents during the General Plan's planning horizon (year 2035).	Partial	Yes	Partial	Partial	Yes	Yes	Yes
Objective 2: Maintain residential densities in outlying areas to accommodate growth, preserve and enhance existing neighborhoods, guide additional growth towards downtown and along key transportation corridors and improve circulation and safety for vehicles and pedestrians.	Partial	Yes	Yes	Yes	Yes	Yes	Yes
Objective 3: Maintain areas for high quality, diversified and employee-intensive industrial, retail, technology, manufacturing and service-oriented businesses that create and sustain a strong economic base and provide opportunities for the full employment of a diverse set of skills.	Partial	No	Yes	No	Yes	Yes	Yes
Objective 4: Create an economically viable urban downtown and urban core with exciting activities and unique land uses that attract local residents and tourists, such as retail, office, residential, entertainment and cultural uses.	Partial	No	Partial	No	Yes	Yes	Yes
Objective 5: Achieve a sustainable and integrated system of land use and transportation in the City in a manner that will: a. Significantly decrease overall community consumption, specifically the consumption of non-local, non-renewable and non-recycled materials, water, and energy and fuels. b. Within renewable limits, encourage the use of local, non-polluting, renewable and recycled resources (water, wind, solar and geothermal energy and material resources). c. Create a multi-modal transportation system that minimizes and, where possible, eliminates pollution and motor vehicle congestion while ensuring safe mobility and access for all without compromising the ability to protect public health and safety. d. Facilitate a reduction in automobile dependency in favor of affordable alternative, sustainable modes of travel.	No	Yes	Partial	Partial	Yes	Yes	Yes

Table 6-2 continued

Proposed Project Objectives	Ability of Alternatives to Meet Proposed Project Objectives: No Project	Reduced Employment	Reduced Residential	Blended Reduced Downtown/Focused Smart Growth and Employment	~~Circulation~~ Mobility and Infrastructure Element Downtown Couplet	Promenade Retail Center and Vicinity	Nutmeg Street
e. Implement land use and transportation planning and policies to foster compact, mixed use projects, forming urban villages designed to maximize housing choices and encourage walking, bicycling and the use of existing and future public transit systems. f. Encourage residents to recognize that they share the local ecosystem with other living things that warrant respect and responsible stewardship.							
Objective 6: Provide a list of specific actions that will reduce Greenhouse Gas (GHG) emissions, with the highest priority given to actions that provide the greatest reduction in GHG emissions and benefits to the community at the least cost, while establishing a qualified reduction plan from which future development within the City can tier.	No	Yes	Yes	Yes	Yes	Yes	Yes

Impact Analysis

Aesthetics

The overall reduction in new development that would occur under the No Project Alternative as compared to the proposed project would reduce the potential for this alternative to result in aesthetics impacts. However, similar to the proposed project, the No Project Alternative (adopted General Plan) designates land uses throughout the planning area, the development of which would result in the obstruction, interruption, or detraction of a scenic vista, scenic resources, visual character or quality and result in additional light or glare. The No Project Alternative would not implement the goals and policies proposed in the General Plan Update or Downtown Specific Plan that protect aesthetic resources within the proposed project area. However, it would continue to implement the Community Goals and Objectives identified in the existing General Plan that pertain to aesthetic resources. The No Project Alternative would result in a reduction in employment land uses and residential units, which would reduce the visual impacts of future development, as compared to the proposed project. This alternative would not focus growth in the 15 General Plan Update study areas and may not adhere to smart growth concepts, which would result in development that is more dispersed throughout the community. However, the overall reduction in new development as compared to the proposed project would reduce the potential for this alternative to impact visual resources, such as scenic vistas, scenic resources and visual character, and light and glare. For this reason, the No Project Alternative would result in reduced aesthetic impacts as compared to the proposed project.

Agriculture and Forestry Resources

Implementation of the No Project Alternative would result in the development of land uses that would potentially result in the direct and indirect conversion of agricultural and forestry resources. Similar to the proposed project, the No Project Alternative would not result in any land use changes or zoning modifications that would result in agricultural land use conflicts. Unlike the proposed project, the No Project Alternative would not result in the implementation of the proposed General Plan Update policies or the E-CAP reduction measures, which encourage and promote agricultural operations within the project area. However, it would continue to implement the Agricultural Land policies identified in the Community Open Space and Conservation Element of the existing General Plan (1990), which would reduce potential impacts to the conversion of agricultural resources. Therefore, the No Project Alternative would result in less than significant impacts to agricultural resources. The overall reduction in new development that would occur under the No Project Alternative would reduce the potential for this alternative to convert agricultural resources to non-agricultural use, as compared to the proposed project. The No Project Alternative would not result in any impacts to forestry resources.

Air Quality

The No Project Alternative would be consistent with the State Implementation Plan (SIP) and Regional Air Quality Strategy (RAQS) because build-out of adopted General Plan (1990) was included in the population assumptions made by the San Diego Association of Governments (SANDAG) and utilized in these air quality plans. Compared to the proposed project, the No Project Alternative would result in reduced impacts in terms of violations of air quality standards because build-out of the proposed project area under this alternative would be less intensive than build-out under the proposed project. However, unlike the proposed project, the No Project Alternative does not propose transit-oriented development or implementation of the E-CAP, which would result in reduced vehicle miles traveled (VMT) and associated pollutant emissions. Therefore, although some construction and operational emissions would be reduced under this alternative as compared to the proposed project, vehicular emissions may be increased. Impacts to sensitive receptors and odors would be less likely to result in a significant impact under the No Project Alternative because this alternative does not propose to re-designate some residential areas to unemployment lands, which could result in air quality and odor impacts to existing non-conforming residential land uses. Although partially reduced as compared to the proposed project, air quality impacts would still be anticipated to be significant under the No Project Alternative and would require mitigation measures similar to those proposed in Section 4.3, Air Quality.

Biological Resources

Similar to implementation of the proposed project, future construction and operation of projects under the No Project Alternative would have the potential to require clearing, grading or grubbing activities that would directly and indirectly impact special status plant and wildlife species; riparian habitats and other sensitive communities; federally protected wetlands and wildlife movement corridors; and nursery sites, although at a lesser level than proposed by the project due to a reduction in overall development that would occur under this alternative. Impacts would be reduced to below a level of significance with compliance with existing regulations and policies identified in the existing General Plan (1990) Community Open Space and Conservation Element. The No Project Alternative would be required to comply with existing local policies and ordinances related to biological resources, Habitat Conservation Plans (HCPs) and Natural Community Conservation Plans (NCCPs), and existing federal and state regulations that protect plants, wildlife, wetlands and other biological resources. Compliance with these regulations would ensure that the No Project Alternative would result in less than significant

direct and indirect impacts to biological resources. Similar to the proposed project, the No Project Alternative would result in significant cumulative impacts to sensitive species, riparian habitats and other sensitive natural communities, and wildlife corridors until the City draft MHCP Subarea Plan is adopted. The mitigation measures identified in Section 4.4, Biological Resources, would be required for the No Project Alternative but this mitigation would not reduce impacts to below a level of significance.

Cultural Resources

Similar to the proposed project, the No Project Alternative would involve demolition, destruction, alteration, structural relocation, grading, trenching or excavation as a result of new private or public development or redevelopment allowable under the existing General Plan (1990). Activities associated with development of land uses proposed in the existing General Plan would have the potential to result in substantial adverse changes to historical resources and archaeological resources, although at a lesser level than proposed by the project due to the reduction in new development that would occur under this alternative. Therefore, implementation of the No Project Alternative would result in similar potentially significant impacts as those identified for the proposed project. The mitigation measures identified in Section 4.5, Cultural Resources, would be required for the No Project Alternative to reduce impacts to below a significant level. Similar to the proposed project, the No Project Alternative would result in less than significant impacts related to paleontological resources and human remains, due to compliance with existing regulations.

Geology and Soils

Similar to the proposed project, the No Project Alternative would result in less than significant impacts associated with seismic related hazards, soil erosion and topsoil loss, soil stability, expansive soils and wastewater disposal systems due to compliance with existing federal, state and local regulations, including the California Building Code (CBC).

Greenhouse Gas Emissions

Under the No Project Alternative, community-wide GHG emissions in the City would continue to increase as a result of new development allowed under the existing General Plan (1990) but the proposed E-CAP reduction measures would not be implemented. Without implementation of the E-CAP reduction measures or additional mitigation measures, future development under the No Project Alternative would conflict with the goals of AB 32. In addition, the associated potential effects of global climate change on the No Project Alternative would increase as compared to the proposed project because it would not implement the policies and measures included in the General Plan Update, E-CAP, and mitigation identified in the various other environmental analysis sections of this EIR which work to conserve resources affected by climate changes such as wildfires, ecosystems, public safety, water supply, public health, and energy. Therefore, the No Project Alternative would result in greater GHG impacts than the proposed project.

Hazards and Hazardous Materials

The overall reduction in new development that would occur under the No Project Alternative as compared to the proposed project would reduce the potential for this alternative to result in hazards and hazardous materials impacts. Similar to the proposed project, the No Project Alternative would be required to comply with the existing applicable federal, state and local regulations related to hazardous materials. Compliance with these regulations would ensure impacts related to the transportation, use and disposal of hazardous materials; accidental release of hazardous materials; hazards to schools; and

existing hazardous materials sites would be less than significant. Also similar to the proposed project, the No Project Alternative would accommodate low density land uses within the vicinity of public and private airports. Existing emergency response and evacuation plans would be continually updated under this alternative, as currently required, which would ensure impacts related to emergency response and evacuation plans would not occur. The proposed project area is in a high risk wildfire area. The No Project Alternative may result in greater impacts related to wildfires, when compared to the proposed project, because this alternative would not implement the policies proposed under the General Plan Update, which reduce impacts related to wildfires to a level below significant.

Hydrology and Water Quality

The overall reduction in new development that would occur under the No Project Alternative as compared to the proposed project would reduce the potential for this alternative to increase impervious surfaces, affecting hydrology, and discharge pollutants, affecting water quality. Implementation of the No Project Alternative would contribute to surface water and ground water quality contaminants, which would result in potentially significant impacts to water quality standards and requirements; erosion and siltation; onsite and offsite flooding; and exceeding the capacity of stormwater systems. Additionally, land uses allowable under the No Project Alternative would also result in dam inundation risks; mudflow risks; and the placement of housing within a 100-year flood hazard area. Similar to the proposed project, compliance with existing regulations, including the NPDES permit program and City Grading Ordinance, would reduce this impact to a level below significant. While the policies proposed under the General Plan Update to reduce hydrology and water quality impacts would not be implemented under this alternative, the existing policies in the adopted General Plan (1990) pertaining to Water Resource Quality and Management and Policies Regarding Stormwater Drainage would continue to be implemented. Therefore, the No Project Alternative would result in similar impacts when compared to the proposed project. Similar to the proposed project, the No Project Alternative would result in less than significant impacts to groundwater resources due to a lack of groundwater supplies within the proposed project area.

Land Use

Under the No Project Alternative, the adopted General Plan (1990) would be the relevant land use document for the proposed project area. Implementation of the No Project Alternative would not result in the physical division of an established community; would not conflict with land use plans, policies and regulations; and would not conflict with HCPs or NCCPs because this alternative represents the currently adopted land use plan for the proposed project area. Land use impacts under the No Project Alternative would be less than significant, similar to the proposed project.

Mineral Resources

The overall reduction in new development that would occur under the No Project Alternative as compared to the proposed project would reduce the potential for this alternative to impact mineral resources. The existing project area is developed with land uses that limit the availability of mineral resources and only a small portion of the project area has been designated as potentially containing mineral resources of value. Similar to the proposed project, implementation of the No Project Alternative would not substantially limit the future availability of known mineral resources or encroach on future resource recovery sites, primarily because the extraction of mineral resources is already precluded by existing development. Impacts would be less than significant, similar to the proposed project.

Noise

The overall reduction in new development that would occur under the No Project Alternative as compared to the proposed project would reduce the potential for this alternative to generate noise from traffic and land use development. However, similar to the proposed project, implementation of the No Project Alternative would still have the potential to expose land uses to noise levels in excess of noise compatibility guidelines during construction or operation associated with the development of future land uses. Also similar to the proposed project, under the No Project Alternative construction equipment could operate within vibration-sensitive land uses; development would permanently increase ambient noise; and ambient noise would temporarily increase from construction activity. Mitigation measures identified in Section 4.12, Noise, would be required to reduce noise impacts associated with the No Project Alternative. While the policies proposed under the General Plan Update that would reduce noise impacts would not be implemented, the existing noise policies in the Community Protection and Safety Element of the adopted General Plan (1990) would continue to be implemented. Therefore, noise impacts under the No Project Alternative would be slightly reduced as compared to the proposed project, due to the overall reduction in new development that would occur under this alternative.

Population and Housing

Implementation of the No Project Alternative would not directly or indirectly induce unplanned population growth because this alternative serves as the adopted land use plan for the project area from which population and growth forecasts prepared by SANDAG are based upon. Additionally, implementation of the No Project Alternative would not result in the re-designation of some existing residential areas to non-residential land uses which could result in the displacement of existing people or housing. When compared to the proposed project, the No Project Alternative would result in similar impacts associated with population growth and fewer impacts associated with the displacement of people and housing.

Public Services

Implementation of the No Project Alternative would accommodate an increase in population within the project area and would require the provision of new or physically altered fire protection, police protection, schools or other facilities which have the potential to result in a substantial adverse environmental physical impact. While the No Project Alternative would not implement the proposed General Plan Update policies that reduce public service related impacts, the existing fire and police policies in the Community Protection and Safety Element of the adopted General Plan (1990) would continue to be implemented. Therefore, the No Project Alternative would result in similar public service impacts as those identified for the proposed project.

Recreation

Implementation of the No Project Alternative would accommodate an increase in population within the project area, which would increase the use of existing parks, thereby resulting in accelerated deterioration of recreational facilities and potentially requiring the construction or expansion of new recreational facilities, which may have an adverse effect on the environment. When compared to the proposed project, the No Project Alternative would not implement the proposed General Plan Update policies, Downtown Specific Plan policies and E-CAP reduction measures related to recreational impacts. However, the existing parks and recreation policies in the Community Facilities and Services Element of

the adopted General Plan (1990) would continue to be implemented. Therefore, the No Project Alternative would result in similar recreation impacts as those identified for the proposed project.

Traffic

The Traffic Impact Analysis (LLG 2011a) prepared for the General Plan Update evaluated transportation and traffic impacts under the No Project Alternative. The complete Traffic Impact Analysis is contained in Appendix I1 of this EIR. Alternative 1 within the Traffic Impact Analysis evaluates transportation and traffic impacts in the year 2035 under implementation of the adopted City of Escondido General Plan (1990), which is the No Project Alternative. When compared to the proposed project, the No Project Alternative would result in fewer impacts to roadway segments within the following study areas: Transit Station Target Area; ERTC North SPA; South Escondido Boulevard/Centre City Parkway Target Area; and South Escondido Boulevard/Felicita Avenue Target Area. The No Project Alternative would result in fewer impacts to intersections within the following study areas: ERTC North SPA; Promenade Retail Center and Vicinity Target Area; South Escondido Boulevard/Felicita Avenue Target Area; and Northeast Quadrant. When compared to the proposed project, the No Project Alternative would result in greater roadway segment impacts within the following study areas: South Quince Street Target Area; Westfield Shoppingtown Target Area; Northeast Quadrant; and Southeast Quadrant. In total, implementation of the No Project Alternative would result in reduced traffic and LOS impacts when compared to the proposed project due to the overall reduction in development that would occur under this alternative.

Similar to the proposed project, implementation of the land uses allowable under the No Project Alternative would not result in a change to air traffic patterns that would result in a safety hazard. Also similar to the proposed project, significant impacts related to road safety and emergency access under the No Project Alternative would be reduced through compliance with applicable regulations and circulation/transportation policies identified in the Land Use Element of the existing General Plan (1990). When compared to the proposed project, the No Project Alternative would not implement the proposed General Plan Update policies and E-CAP measures that promote alternative transportation; however, the existing General Plan policies related to transportation system management and public transit would continue to be implemented. Therefore, impacts to road safety, emergency access, and alternative transportation under the No Project Alternative would be similar to those identified for the proposed project.

Utilities and Service Systems

The development of future land uses as designated in the No Project Alternative would increase population within the project area over existing conditions and could result in: 1) demand for wastewater treatment services increasing at a rate disproportionate to facility capabilities, which would result in a violation in wastewater treatment standards; 2) increase in demand for water and wastewater services, thereby requiring the construction of new facilities; 3) construction of new stormwater facilities to accommodate increased development; 4) additional demand on the existing wastewater system that would result in inadequate capacity to serve the projected demand; and 5) construction or expansion of energy facilities, which would result in significant environmental effects. When compared to the proposed project, the No Project Alternative would not implement the proposed General Plan Update policies that reduce utilities and service system impacts. However, existing policies related to the provision of utilities and service systems identified in the adopted General Plan (1990) would reduce impacts associated with the No Project Alternative to below a level of significance, with the exception of water supply and landfill capacity. Similar to the proposed project, the No Project

Alternative would result in inadequate water supplies, due to potential shortages during multiple dry water years and inadequate solid waste disposal facilities due to difficulties in siting and permitting such projects. Therefore, the No Project Alternative would result in similar utility and service system impacts as those identified for the proposed project.

Ability to Accomplish Project Objectives

The No Project Alternative would only partially meet four of the proposed project objectives (1, 2, 3 and 4) and would not meet the other two project objectives (5 and 6). The No Project Alternative would partially meet Objective 1 and Objective 2 because this alternative would preserve and enhance existing neighborhoods and improve circulation and safety but would not guide additional growth towards downtown or along key transportation corridors and would not adjust the existing General Plan boundaries to allow for the planning of quality, managed and sustainable growth or meet the housing needs of future residents. The No Project Alternative would partially meet Objectives 3 and 4 because it would provide employment uses (Objective 3) and promote a developed downtown and urban core (Objective 4), although not to the same extent as the proposed project. Objectives 5 and 6 would not be met by the No Project Alternative because the E-CAP measures to reduce energy usage and associated GHG emissions would not be implemented. In addition, SANDAG's smart growth strategies that promote multi-modal transportation and the alternative transportation concepts identified in the Complete Streets Assessment (LLG 2011c) would not be implemented. For these reasons, the No Project Alternative would only partially meet three of the proposed project objectives and would not meet the other two project objectives.

6.3.2 Reduced Employment Alternative

The Reduced Employment Alternative would implement the proposed General Plan Update goals and policies; the Downtown Specific Plan Update goals and policies; and the E-CAP. However, under the Reduced Employment Alternative, multiple areas identified for employment land uses under the proposed project would be reduced or eliminated entirely. The Reduced Employment Alternative would accommodate the same total number of dwelling units as the proposed project, which amounts to an increase of 9,924 dwelling units over existing conditions. When compared to the proposed project, the Reduced Employment Alternative would accommodate a total of 7,457,000 sf of employment land uses, or 6,193,000 sf less employment land uses than the proposed project would accommodate. Table 6-3, Reduced Employment Alternative Land Use Comparison, identifies study areas that would experience reduced or eliminated employment lands under the Reduced Employment Alternative as compared to the proposed project.

Table 6-3 Reduced Employment Alternative Land Use Comparison

Study Area	Proposed Project Employment Land Uses (square feet)	Reduced Employment Alternative Employment Land Uses (square feet)
Downtown SPA	1,888,000	1,000,000
East Valley Parkway Target Area	735,000	500,000
Transit Station Target Area	1,221,000	1,000,000
I-15 / Felicita Road Corporate Office Target Area	986,000	0
Imperial Oakes SPA	2,575,000	0
ERTC North SPA	550,000	0
ERTC South SPA	738,000	0
Total	**13,650,000**	**7,457,000**

Impact Analysis

Aesthetics

Similar to the proposed project, the Reduced Employment Alternative would designate land uses throughout the planning area, the development of which would result in the obstruction, interruption, or detraction of a scenic vista, scenic resources, visual character or quality and additional light or glare. The Reduced Employment Alternative would implement the goals and policies proposed within the General Plan Update and Downtown Specific Plan Update that protect aesthetic resources. Implementation of these policies would result in the Reduced Employment Alternative having less than significant impacts related to scenic vistas, scenic resources and visual character and light and glare, similar to the proposed project. Because the Reduced Employment Alternative would result in less employment land use development than the proposed project, it would potentially reduce aesthetic impacts as compared to the proposed project.

Agriculture and Forestry

Implementation of the Reduced Employment Alternative would result in the development of land uses, primarily low density residential, that would potentially result in the direct and indirect conversion of agricultural and forestry resources. Similar to the proposed project, the Reduced Employment Alternative would not result in any land use or zoning changes that would cause agricultural land use conflicts. Also similar to the proposed project, the Reduced Employment Alternative would implement the proposed General Plan Update policies and E-CAP reduction measures that encourage and promote agricultural operations within the project area. Implementation of these policies and reduction measures would result in the Reduced Employment Alternative having less than significant direct and indirect impacts to agricultural resources, similar to the proposed project. The Reduced Employment Alternative would result in less employment land use development than the proposed project, which would potentially reduce agricultural resource impacts when compared to the proposed project. The Reduced Employment Alternative would not result in any impacts to forestry resources.

Air Quality

The Reduced Employment Alternative would accommodate less office, commercial and industrial development than the proposed project. Similar to the proposed project, all future development would be required to demonstrate compliance with the strategies and measures adopted as part of the RAQS

and SIP, as well as with the requirements of the City and/or San Diego Air Pollution Control District (SDAPCD). Compliance with these regulations would result in less than significant impacts associated with conflicts to applicable air quality plans, similar to the proposed project. Although less construction and operational emissions would be expected under this alternative due to the reduction in employment land uses, emissions associated with development of the land uses proposed under the Reduced Employment Alternative would still have the potential to result in significant impacts associated with criteria pollutants including VOCs, PM_{10}, and $PM_{2.5}$. Mitigation measures listed in Section 4.3, Air Quality, would be required for the Reduced Employment Alternative in order to lessen construction and operational emissions of criteria pollutants. Similar to the proposed project, mitigation would reduce impacts, but not to below a level of significance.

Also similar to the proposed project, the Reduced Employment Alternative would have the potential to result in the exposure of sensitive receptors to substantial amounts of toxic air contaminants (TACs) that could increase cancer risks due to construction and operational activities. Although less construction and operational emissions would be expected under this alternative due to a reduction in employment land uses, mitigation measures Air-3 and Air-4 identified for the proposed project would be implemented to reduce direct and cumulative impacts to sensitive receptors to below a significant level. Also similar to the proposed project, the Reduced Employment Alternative would comply with SDAPCD regulations that require odor sources to reduce impacts to nearby sensitive receptors, resulting in a less than significant impact.

Biological Resources

Similar to implementation of the proposed project, future development under the Reduced Employment Alternative would have the potential to directly impact special status plant and wildlife species; riparian habitats and other sensitive communities; federally protected wetlands and wildlife movement corridors; and nursery sites through construction activities including clearing, grading or grubbing. The Reduced Employment Alternative would result in less employment land use development than the proposed project, which would potentially reduce overall biological resource impacts when compared to the proposed project. All future development under the Reduced Employment Alternative would be required to comply with existing local policies and ordinances related to biological resources, adopted HCPs and NCCPs and existing federal and state regulations that protect plants, wildlife, wetlands and other biological resources. Compliance with these regulations would ensure that the Reduced Employment Alternative would result in less than significant direct and indirect impacts to biological resources. Also similar to the proposed project, until the City's MHCP Subarea Plan is adopted, the Reduced Employment Alternative would result in a cumulatively considerable significant and unavoidable contribution to impacts to sensitive species, riparian habitats and other sensitive natural communities; and wildlife corridors, even with implementation of the mitigation measures identified in Section 4.4, Biological Resources.

Cultural Resources

Similar to the proposed project, the Reduced Employment Alternative would involve demolition, destruction, alteration, structural relocation, grading, trenching or excavation as a result of new private or public development or redevelopment. Activities associated with development of the Reduced Employment Alternative would have the potential to result in substantial adverse changes to historical resources and archaeological resources, although at a lesser level than proposed by the project due to a reduction in employment land use development under this alternative. Implementation of the Reduced

Employment Alternative would result in significant cultural resources impacts and the mitigation measures identified in Section 4.5, Cultural Resources, would be required to reduce impacts to below a significant level, similar to the proposed project. Similar to the proposed project, the Reduced Employment Alternative would result in less than significant impacts related to paleontological resources and human remains, due to compliance with existing regulations.

Geology and Soils

Similar to the proposed project, the Reduced Employment Alternative would comply with existing federal, state and local regulations, such as the CBC, and would result in less than significant impacts associated with seismic related hazards, soil erosion and topsoil loss, soil stability, expansive soils, and wastewater disposal systems.

Greenhouse Gas Emissions

Under the Reduced Employment Alternative, the proposed E-CAP reduction measures and General Plan Update policies would be implemented, similar to the proposed project. Incorporation of the E-CAP reduction measures and the General Plan Update policies would result in less than significant impacts related to compliance with AB 32 and the effects of global climate change on the Reduced Employment Alternative.

Hazards and Hazardous Materials

Similar to the proposed project, the Reduced Employment Alternative would be required to comply with existing applicable federal, state and local regulations related to hazardous materials. Compliance with these regulations would ensure that this alternative would result in less than significant impacts related to the transportation, use and disposal of hazardous materials; accidental release of hazardous materials; hazards to schools; and existing hazardous materials sites. Also similar to the proposed project, the Reduced Employment Alternative would accommodate low density land uses within the vicinity of public and private airports. Existing emergency response and evacuation plans would be continually updated under this alternative, as currently required, and impacts related to emergency response and evacuation plans would be less than significant. The Reduced Employment Alternative would implement the General Plan Update policies related to wildfires and impacts related to wildfires under this alternative would be less than significant, similar to the proposed project.

Hydrology and Water Quality

Implementation of the Reduced Employment Alternative would increase impermeable surfaces within the project area from the development of future land uses, which would result in hydromodification and contribute to surface water and ground water quality contamination. Therefore, the Reduced Employment Alternative would result in potentially significant impacts to water quality standards and requirements; erosion and siltation; onsite and offsite flooding; and exceeding the capacity of stormwater systems. Similar to the proposed project, land uses allowable under the Reduced Employment Alternative would result in dam inundation risks; mudflow risks; and the placement of housing within a 100-year flood hazard area. Compliance with existing regulations would reduce these impacts to a level below significant, similar to the proposed project. Similar to the proposed project, the Reduced Employment Alternative would result in a less than significant impact to groundwater resources due to a lack of groundwater supplies within the project area. Additionally, the Reduced Employment Alternative would implement the policies proposed under the General Plan Update that

would further reduce hydrology and water quality impacts. The Reduced Employment Alternative would result in less than significant impacts to hydrology and water quality.

Land Use

Under the Reduced Employment Alternative, less employment land use development would occur, as shown in Table 6-3, Reduced Employment Alternative Land Use Comparison. Aside from the reductions in employment lands in certain study areas, as shown in the table, the land uses proposed under the General Plan Update would be the same under this alternative. Similar to the proposed project, implementation of the Reduced Employment Alternative would not result in the physical division of an established community; would not conflict with land use plans, policies and regulations; and would not conflict with HCPs or NCCPs. Land use impacts under the Reduced Employment Alternative would be less than significant.

Minerals

Similar to the proposed project, implementation of the Reduced Employment Alternative would not support growth that would substantially limit the future availability of known mineral resources and would not encroach on areas where future resource recovery sites may occur. This is because the project area is developed with existing land uses that limit the availability of mineral resources and only a small portion of the project area has been designated as containing mineral resources of value. Impacts to mineral resources would be less than significant under the Reduced Employment Alternative, similar to the proposed project.

Noise

During construction or operational activities, the Reduced Employment Alternative would have the potential to expose land uses to noise levels in excess of noise compatibility guidelines. Implementation of the Reduced Employment Alternative would also have the potential to affect groundborne vibration-sensitive land uses near the ~~Sprinter~~SPRINTER rail line and where vibration-causing construction equipment would operate within close proximity of vibration-sensitive land uses. Similar to the proposed project, development of land uses allowed under the Reduced Employment Alternative would permanently increase ambient noise along roadways and would have the potential to temporarily increase ambient noise from construction activity. The mitigation measures identified in Section 4.12, Noise, would be implemented to reduce impacts associated with the Reduced Employment Alternative, although not to a level below significant. When compared to the proposed project, noise impacts under the Reduced Employment Alternative would be less due to the reduction in employment land use development and the associated reduction in construction and operational noises. However, impacts would still be considered significant and unavoidable. Similar to the proposed project, impacts related to excessive noise from airports would not occur.

Population and Housing

The Reduced Employment Alternative would result in less employment land use development when compared to the proposed project but would accommodate the same number of dwelling units as the proposed project. Similar to the proposed project, implementation of the Reduced Employment Alternative would not directly or indirectly induce unplanned population growth. Also similar to the proposed project, implementation of the Reduced Employment Alternative would result in some areas currently designated for residential land uses being re-designated for non-residential land uses. Due to

the reduction in employment land uses under this alternative, impacts associated with the displacement of housing would be reduced when compared to the proposed project. However, some impacts associated with the displacement of housing would still occur under this alternative which would be considered significant and unavoidable, even with compliance with existing regulations, implementation of General Plan Update policies and mitigation measure Pop-1.

Public Services

Implementation of the Reduced Employment Alternative would accommodate an increased population within the project area over existing conditions which would require the provision of new or physically altered fire protection, police protection, schools and library facilities which may result in an adverse environmental impact. The Reduced Employment Alternative would accommodate the same population as the proposed project and would be expected to result in similar impacts to schools and library facilities, when compared to the proposed project. However, fire and police services would be reduced as compared to the proposed project, since this alternative would result in a substantial reduction in employment land uses that would require fire and police protection. Similar to the proposed project, the Reduced Employment Alternative would implement the proposed General Plan Update policies that reduce impacts to public services and would result in less than significant public services impacts.

Recreation

Similar to the proposed project, implementation of the Reduced Employment Alternative would accommodate an increase in population over existing conditions within the project area which would result in an increase in the use of existing parks and recreational facilities, resulting in accelerated deterioration of existing recreational facilities and requiring the construction or expansion of new facilities. The Reduced Employment Alternative would implement the proposed General Plan Update policies, Downtown Specific Plan policies and E-CAP reduction measures which would reduce recreational impacts to below a level of significance. Therefore, the Reduced Employment Alternative would result in less than significant impacts to recreational resources, similar to the proposed project.

Traffic

Although implementation of the Reduced Employment Alternative would reduce employment land uses and the vehicle trips associated with these land uses, it is anticipated that the majority of traffic and LOS impacts occurring under the proposed project would also occur under the Reduced Employment Alternative. Therefore, traffic and LOS impacts under this alternative would be significant and unavoidable, even with implementation of the mitigation measures listed in Section 4.16, Transportation and Traffic, similar to the proposed project. When compared to the proposed project, the Reduced Employment Alternative would result in a reduced level of traffic impacts, due to the reduction in employment lands and associated vehicular trips, but impacts would still be considered significant and unavoidable. Also similar to the proposed project, implementation of the Reduced Employment Alternative would not result in changes to air traffic patterns that would result in safety hazards. The Reduced Employment Alternative would comply with existing regulations and would implement the proposed General Plan Update policies, which would reduce impacts related to road safety, emergency access and alternative transportation to a less than significant level, similar to the proposed project.

Utilities and Service Systems

Similar to the proposed project, the Reduced Employment Alternative would accommodate an increased population over existing conditions, which could significantly impact utilities and service systems. The Reduced Employment Alternative would accommodate the same population as the proposed project; however, the development of fewer employment land uses would reduce the demand for utility and service systems as compared to the proposed project. Compliance with existing regulations and implementation of the proposed General Plan Update policies would reduce potentially significant impacts related to the following issues to a less than significant level: 1) demand for wastewater treatment services that may result in a violation in wastewater treatment standards; 2) demand for water and wastewater services, requiring the construction of new facilities; 3) construction of new stormwater facilities to accommodate increased development; 4) additional demand on the existing wastewater system that would result in inadequate capacity to serve the projected demand; and 5) construction or expansion of energy facilities. Similar to the proposed project, future growth under the Reduced Employment Alternative would result in inadequate water supplies, due to potential shortages during multiple dry water years and inadequate solid waste disposal facilities due to difficulties in siting and permitting such projects. Also similar to the proposed project, the Reduced Employment Alternative would comply with solid waste regulations and result in a less than significant solid waste regulation impact.

Ability to Accomplish Project Objectives

The Reduced Employment Alternative would meet Objectives 1, 2, 5 and 6. The Reduced Employment Alternative would be consistent with Objective 1 because it would establish the same General Plan boundary as the proposed project, meet the housing needs of future residents. The Reduced Employment Alternative would meet Objective 2 because it would maintain residential densities in outlying areas to accommodate growth, preserve existing neighborhoods, guide additional growth towards downtown and along key transportation corridors and improve circulation and safety. This alternative would achieve Objectives 5 and 6 by implementing the E-CAP measures to reduce energy usage and associated GHG emissions. In addition, this alternative would implement SANDAG's smart growth strategies that promote multi-modal transportation and the alternative transportation concepts identified in the Complete Streets Assessment (LLG 2011c). The Reduced Employment Alternative would not meet Objective 3 or Objective 4. A reduction in employment land uses under this alternative would result in the inability to create and sustain a strong economic base for the community (Objective 3) or create an economically viable urban downtown and urban core (Objective 4).

6.3.3 Reduced Residential Alternative

The Reduced Residential Alternative would implement the proposed General Plan Update goals and policies; the Downtown Specific Plan Update goals and policies; and the E-CAP. However, under the Reduced Residential Alternative, multiple areas identified for smart growth residential land uses under the proposed project would be reduced or eliminated entirely. When compared to the proposed project, the Reduced Residential Alternative would accommodate a total of 5,899 dwelling units, or 4,025 less dwelling units than would be accommodated by the proposed project. The Reduced Residential Alternative would accommodate the same square footage of employment land use as the proposed project, or 13,650,000 sf of employment lands. Table 6-4, Reduced Residential Alternative

Land Use Comparison, identifies study areas that would experience reduced or eliminated smart growth residential land uses under the Reduced Residential Alternative as compared to the proposed project.

Table 6-4 Reduced Residential Alternative Land Use Comparison

Study Area	Proposed Project Smart Growth Residential Land Uses (dwelling units)	Reduced Residential Alternative Smart Growth Residential Land Uses (dwelling units)
Downtown SPA	3,275	1,350
South Escondido Boulevard/Felicita Road Target Area	775	300
Transit Station Target Area	800	400
Centre City Parkway/ Brotherton Road Target Area	1,125	450
East Valley Parkway Target Area	1,125	450
Total	**9,924**	**5,899**

Impact Analysis

Aesthetics

Similar to the proposed project, the Reduced Residential Alternative would designate land use uses throughout the planning area, the development of which would result in the obstruction, interruption, or detraction of a scenic vista, scenic resources, visual character or quality and additional light or glare. The Reduced Residential Alternative would implement the goals and policies proposed in the General Plan Update and Downtown Specific Plan that protect aesthetic resources. Implementation of these policies would result in the Reduced Residential Alternative having less than significant impacts related to scenic vistas, scenic resources and visual character and light and glare, similar to the proposed project. Because the Reduced Residential Alternative would result in less residential land use development than the proposed project, it would potentially reduce aesthetic impacts as compared to the proposed project.

Agriculture and Forestry

Implementation of the Reduced Residential Alternative would result in the development of land uses, primarily low density residential, that would potentially result in the direct and indirect conversion of agricultural and forestry resources. Similar to the proposed project, the Reduced Residential Alternative would not result in any land use changes or zoning changes that would cause agricultural land use conflicts. Also similar to the proposed project, the Reduced Residential Alternative would implement the proposed General Plan Update policies and the E-CAP reduction measures that encourage and promote agricultural operations in the project area. Implementation of these policies and reduction measures would result in the Reduced Residential Alternative having less than significant direct or indirect impacts related to agricultural resources, similar to the proposed project. The Reduced Residential Alternative would result in less residential land use development than the proposed project, which would potentially reduce agricultural resource impacts when compared to the proposed project. The Reduced Residential Alternative would not result in any impacts to forestry resources.

Air Quality

The Reduced Residential Alternative would accommodate less residential and mixed use development than the proposed project. Similar to the proposed project, all future development would be required to

demonstrate compliance with the strategies and measures adopted as part of the RAQS and SIP, as well as with the requirements of the City and/or SDAPCD. Compliance with these regulations would result in less than significant impacts associated with conflicts to applicable air quality plans, similar to the proposed project. Although less construction and operational emissions would be expected under this alternative due to the reduction in residential land uses, emissions associated with development of the land uses proposed under the Reduced Residential Alternative would still have the potential to result in significant impacts associated with the construction and operational emissions of criteria pollutants including VOCs, PM_{10}, and $PM_{2.5}$. Mitigation measures listed in Section 4.3, Air Quality, would be required under the Reduced Residential Alternative to lessen construction and operational emissions of criteria pollutants. Similar to the proposed project, mitigation would reduce impacts, but not to below a level of significance.

Also similar to the proposed project, the Reduced Residential Alternative would have the potential to result in the exposure of sensitive receptors to substantial amounts of TACs that could increase cancer risks due to construction and operational activities. Although less construction and operational emissions would be expected under this alternative due to a reduction in residential land uses, mitigation measures Air-3 and Air-4 identified for the proposed project would be implemented to reduce direct and cumulative impacts to sensitive receptors to below a significant level. Also similar to the proposed project, the Reduced Residential Alternative would comply with SDAPCD regulations that require odor sources to reduce impacts to nearby sensitive receptors, resulting in a less than significant impact.

Biological Resources

Similar to implementation of the proposed project, future development under the Reduced Residential Alternative would have the potential to directly impact special status plant and wildlife species; riparian habitats and other sensitive communities; federally protected wetlands; and wildlife movement corridors and nursery sites through construction activities including clearing, grading or grubbing. The Reduced Residential Alternative would result in less residential land use development than the proposed project, which would potentially reduce overall biological resource impacts when compared to the proposed project. All future development under the Reduced Residential Alternative would be required to comply with existing local policies and ordinances related to biological resources, adopted HCPs and NCCPs and existing federal and state regulations that protect plants, wildlife, wetlands and other biological resources. Compliance with these regulations would ensure that the Reduced Residential Alternative would result in less than significant direct and indirect impacts to biological resources. Also similar to the proposed project, until the City's MHCP Subarea Plan is adopted, the Reduced Residential Alternative would result in a cumulatively considerable significant and unavoidable contribution to impacts to sensitive species, riparian habitats and other sensitive natural communities, and wildlife corridors, even with implementation of the mitigation measures identified in Section 4.4, Biological Resources.

Cultural Resources

Similar to the proposed project, the Reduced Residential Alternative would involve demolition, destruction, alteration, structural relocation, grading, trenching or excavation as a result of new private or public development or redevelopment. Activities associated with development of the Reduced Residential Alternative would have the potential to result in substantial adverse changes to historical resources and archaeological resources, although at a lesser level than proposed by the project due to a

reduction in residential land uses under this alternative. Implementation of the Reduced Residential Alternative would result in significant cultural resources impacts and the mitigation measures identified in Section 4.5, Cultural Resources, would be required to reduce impacts to below a significant level, similar to the proposed project. Similar to the proposed project, the Reduced Residential Alternative would result in less than significant impacts related to paleontological resources and human remains, due to compliance with existing regulations.

Geology and Soils

Similar to the proposed project, the Reduced Residential Alternative would comply with existing federal, state and local regulations, such as the CBC, and would result in less than significant impacts associated with seismic related hazards, soil erosion and topsoil loss, soil stability, expansive soils, and wastewater disposal systems.

Greenhouse Gas Emissions

Under the Reduced Residential Alternative, the proposed E-CAP reduction measures and General Plan Update policies would be implemented, similar to the proposed project. Incorporation of the E-CAP reduction measures and the General Plan Update policies would result in less than significant impacts related to compliance with AB 32 and the effects of global climate change on the Reduced Residential Alternative.

Hazards and Hazardous Materials

Similar to the proposed project, the Reduced Residential Alternative would be required to comply with existing applicable federal, state and local regulations related to hazardous materials. Compliance with these regulations would ensure that this alternative would result in less than significant impacts related to the transportation, use and disposal of hazardous materials; accidental release of hazardous materials; hazards to schools; and existing hazardous materials sites. Also similar to the proposed project, the Reduced Residential Alternative would accommodate low density land uses within the vicinity of public and private airports. Existing emergency response and evacuation plans would be continually updated under this alternative, as currently required, and impacts related to emergency response and evacuation plans would be less than significant. The Reduced Residential Alternative would implement the General Plan Update policies related to wildfires and impacts related to wildfires under this alternative would be less than significant, similar to the proposed project.

Hydrology and Water Quality

Implementation of the Reduced Residential Alternative would increase impermeable surfaces within the project area from the development of future land uses, which would result in hydromodification and contribute to surface water and ground water quality contamination. Therefore, the Reduced Residential Alternative would result in potentially significant impacts to water quality standards and requirements; erosion and siltation; onsite and offsite flooding; and exceeding the capacity of stormwater systems. The Reduced Residential Alternative would result in less residential land use development than the proposed project, which would potentially reduce hydrology and water quality impacts when compared to the proposed project. Similar to the proposed project, land uses allowable under the Reduced Residential Alternative would result in dam inundation risks; mudflow risks; and the placement of housing within a 100-year flood hazard area. Compliance with existing regulations would reduce these impacts to a level below significant, similar to the proposed project. Similar to the proposed project, the Reduced Residential Alternative would result in a less than significant impact to

groundwater resources due to a lack of groundwater supplies within the project area. Additionally, the Reduced Residential Alternative would implement the policies proposed under the General Plan Update that would further reduce hydrology and water quality impacts. The Reduced Residential Alternative would result in less than significant impacts to hydrology and water quality.

Land Use

Under the Reduced Residential Alternative, less residential land use development would occur, as shown in Table 6-4, Reduced Residential Alternative Land Use Comparison. Aside from the reductions in residential lands in certain study areas, as shown in the table, the land uses proposed under the General Plan Update would be the same under this alternative. Similar to the proposed project, implementation of the Reduced Residential Alternative would not result in the physical division of an established community; would not conflict with land use plans, policies and regulations; and would not conflict with HCPs or NCCPs. Land use impacts under the Reduced Residential Alternative would be less than significant.

Minerals

Similar to the proposed project, implementation of the Reduced Residential Alternative would not support growth that would substantially limit the future availability of known mineral resources and would not encroach on areas where future resource recovery sites may occur. This is because the project area is developed with existing land uses that limit the availability of mineral resources and only a small portion of the project area has been designated as containing mineral resources of value. Impacts to mineral resources would be less than significant under the Reduced Residential Alternative, similar to the proposed project.

Noise

During construction or operational activities, the Reduced Residential Alternative would have the potential to expose land uses to noise levels in excess of noise compatibility guidelines. Implementation of the Reduced Residential Alternative would also have the potential to affect groundborne vibration-sensitive land uses near the ~~Sprinter~~SPRINTER rail line and where vibration-causing construction equipment would operate within close proximity of vibration-sensitive land uses. Similar to the proposed project, development of land uses allowable under the Reduced Residential Alternative would permanently increase ambient noise along roadways and would have the potential to temporarily increase ambient noise from construction activity. The mitigation measures identified in Section 4.12, Noise, would be implemented to reduce impacts associated with the Reduced Residential Alternative, although not to a level below significant. When compared to the proposed project, noise impacts under the Reduced Residential Alternative would be less due to the reduction in residential land use development and the associated reduction in construction and operational noises. However, impacts would still be considered significant and unavoidable. Similar to the proposed project, impacts related to excessive noise from airports would not occur.

Population and Housing

The Reduced Residential Alternative would result in less residential land use development as compared to the proposed project. This alternative would still achieve the City's current Regional Housing Needs Assessment (RHNA) housing allocation that covers the period of January 1, 2013 through December 31, 2020. However, the Reduced Residential Alternative may not satisfy future RHNA allocations. Similar to the proposed project, implementation of the Reduced Residential Alternative would not directly or

indirectly induce unplanned population growth, although this alternative would not adequately plan for future growth projected by the City and SANDAG since it would not provide adequate housing for anticipated increases in population. Additionally, the Reduced Residential Alternative would not generate the housing needed to attract the desired mix of entertainment and activities that rely on a more dense, higher populated urban core. Also similar to the proposed project, implementation of the Reduced Residential Alternative would result in some areas currently designated for residential land uses to be re-designated for non-residential land uses. Impacts associated with the displacement of housing under this alternative would be considered significant and unavoidable, even with compliance with existing regulations, implementation of General Plan Update policies and mitigation measure Pop-1.

Public Services

Implementation of the Reduced Residential Alternative would accommodate an increased population within the project area, which would require the provision of new or physically altered fire protection, police protection, schools and library facilities which may result in an adverse environmental impact. The Reduced Residential Alternative would accommodate less residential development than the proposed project, which would reduce the demand for public services and the need to provide new or expanded facilities, the construction of which would have the potential to result in significant environmental impacts. Similar to the proposed project, the Reduced Residential Alternative would implement the proposed General Plan Update policies that reduce impacts to public services and would result in less than significant public services impacts.

Recreation

Similar to the proposed project, implementation of the Reduced Residential Alternative would accommodate an increase in population over existing conditions within the project area which would result in an increase in the use of existing parks and recreational facilities, resulting in accelerated deterioration of existing recreational facilities and requiring the construction or expansion of new facilities. The Reduced Residential Alternative would accommodate less residential development than the proposed project, which would reduce the demand for recreational facilities and the need to provide new or expanded facilities, the construction of which would have the potential to result in significant environmental impacts. The Reduced Residential Alternative would implement the proposed General Plan Update policies, Downtown Specific Plan policies and E-CAP reduction measures which would reduce recreational impacts to below a level of significance. Therefore, the Reduced Residential Alternative would result in less than significant impacts to recreational resources, similar to the proposed project.

Traffic

Although implementation of the Reduced Residential Alternative would reduce residential land uses and the vehicle trips associated with these land uses; it is anticipated that the majority of traffic and LOS impacts occurring under the proposed project would also occur under the Reduced Residential Alternative. Therefore, traffic and LOS impacts under this alternative would be significant and unavoidable, even with implementation of the mitigation measures listed in Section 4.16, Transportation and Traffic, similar to the proposed project. When compared to the proposed project, the Reduced Residential Alternative would result in a reduced level of traffic impacts, due to the reduction in residential lands and associated vehicular trips, but impacts would still be considered significant and unavoidable. Also similar to the proposed project, implementation of the Reduced

Residential Alternative would not result in changes to air traffic patterns that would result in safety hazards. The Reduced Residential Alternative would comply with existing regulations and would implement the proposed General Plan Update policies, which would reduce impacts related to road safety, emergency access, and alternative transportation to a less than significant level, similar to the proposed project.

Utilities and Service Systems

Similar to the proposed project, the Reduced Residential Alternative would accommodate an increased population over existing conditions, which could significantly impact utilities and service systems. The Reduced Residential Alternative would accommodate less residential development than the proposed project, which would reduce demand for utility and service systems when compared to the proposed project. Compliance with existing regulations and implementation of the proposed General Plan Update policies would reduce potentially significant impacts related to the following issues to a less than significant level: 1) demand for wastewater treatment services that may result in a violation in wastewater treatment standards; 2) demand for water and wastewater services, requiring the construction of new facilities; 3) construction of new stormwater facilities to accommodate increased development; 4) additional demand on the existing wastewater system that would result in inadequate capacity to serve the projected demand; and 5) construction or expansion of energy facilities. Similar to the proposed project, future growth under the Reduced Residential Alternative would result in inadequate water supplies due to potential shortages during multiple dry water years and inadequate solid waste disposal facilities due to difficulties in siting and permitting such projects. Also similar to the proposed project, the Reduced Residential Alternative would comply with solid waste regulations and result in a less than significant solid waste regulation impact.

Ability to Accomplish Project Objectives

The Reduced Residential Alternative would meet Objectives 2, 3 and 6 and partially meet Objectives 1, 4 and 5. The Reduced Residential Alternative would partially meet Objective 1 because it would establish the same General Plan boundary as the proposed project; however, it would not meet the long-term housing needs of future residents identified in Objective 1. The Reduced Residential Alternative would meet Objective 2 because it would preserve existing neighborhoods, guide additional growth towards downtown and along key transportation corridors, and improve circulation and safety for vehicles and pedestrians. Although this alternative would result in a reduction in residential land uses, it would still result in ability to create and sustain a strong economic base for the community by proposing the same amount of employment lands as the proposed project (Objective 3). This alternative would partially meet Objective 4, because it would create an economically viable urban downtown and core but would not provide the needed residential development in the downtown area as the proposed project to support those economic uses. This alternative would partially meet Objective 5, because it would achieve a sustainable and integrated system of land use and transportation. However, it would not create compact, mixed use projects, forming urban villages designed to maximize affordable housing to the same extent as the proposed project because multiple areas identified for smart growth residential land uses under the proposed project would be reduced or eliminated entirely under this alternative. The Reduced Residential Alternative would achieve Objective 6 by implementing the E-CAP measures to reduce energy usage and associated GHG emissions. In addition, this alternative would implement strategies that promote multi-modal transportation and the alternative transportation concepts identified in the Complete Streets Assessment (LLG 2011c).

6.3.4 Blended Reduced Downtown/Focused Smart Growth and Employment

The Blended Reduced Downtown/Focused Smart Growth and Employment Alternative would implement the proposed General Plan Update goals and policies; the Downtown Specific Plan Update goals and policies; and the E-CAP. However, under this alternative multiple areas identified for smart growth residential land uses and employment land uses under the proposed project would be reduced or eliminated entirely. The Blended Reduced Downtown/Focused Smart Growth and Employment Alternative would accommodate 2,625 less dwelling units than the proposed project, or a total of 7,299 dwelling units by 2035. The Blended Reduced Downtown/Focused Smart Growth and Employment Alternative would accommodate a total of 10,575,000 sf of employment land uses, which is 3,075,000 sf less than would be accommodated by the proposed project. Table 6-5, Blended Reduced Downtown/ Focused Smart Growth and Employment Alternative Land Use Comparison, identifies study areas that would experience reduced or eliminated smart growth residential and employment lands under the Blended Reduced Downtown/Focused Smart Growth and Employment Alternative. As identified in this table, the primary areas where residential and/or employment land uses would be reduced are the Downtown SPA, Felicita Avenue and Centre City Parkway, Transit Station Target Area, Centre City Parkway/ Brotherton Road Target Area, East Valley Parkway Target Area and Imperial Oaks SPA.

Table 6-5 Blended Reduced Downtown/Focused Smart Growth and Employment Alternative Land Use Comparison

Study Area	Proposed Project Land Uses	Blended Reduced Downtown/ Focused Smart Growth and Employment Alternative Land Uses
Downtown SPA	3,275 dwelling units & 1,888,000 sf	2,500 dwelling units & 1,388,000 sf
Felicita Avenue/ Centre City Parkway	775 dwelling units	500 units
Transit Station Target Area	800 dwelling units	400 units
Centre City Parkway/ Brotherton Road Target Area	1,125 dwelling units	450 dwelling units
East Valley Parkway Target Area	1,000 dwelling units	450 dwelling units
Imperial Oaks SPA	2,575,000 sf	0 sf

Impact Analysis

Aesthetics

Similar to the proposed project, the Blended Reduced Downtown/Focused Smart Growth and Employment Alternative would designate land use uses throughout the planning area, the development of which would result in the obstruction, interruption, or detraction of a scenic vista, scenic resources, visual character or quality and additional light or glare. The Blended Reduced Downtown/Focused Smart Growth and Employment Alternative would implement the goals and policies proposed in the General Plan Update and Downtown Specific Plan that protect aesthetic resources. Implementation of these policies would result in the Blended Reduced Downtown/Focused Smart Growth and Employment Alternative having less than significant impacts related to scenic vistas, scenic resources and visual character, similar to the proposed project. When compared to the proposed project, the Blended Reduced Downtown/Focused Smart Growth and Employment Alternative would result in less residential and employment land use development, which would potentially reduce aesthetics impacts.

Agriculture and Forestry

Implementation of the Blended Reduced Downtown/Focused Smart Growth and Employment Alternative would result in the development of land uses primarily low density residential, that would potentially result in the direct and indirect conversion of agricultural and forestry resources. Similar to the proposed project, this alternative would not result in any land use changes or zoning changes that would cause agricultural land use conflicts. Also similar to the proposed project, the Blended Reduced Downtown/Focused Smart Growth and Employment Alternative would implement the proposed General Plan Update policies and E-CAP reduction measures that encourage and promote agricultural operations in the project area. Implementation of these policies and reduction measures would result in the Blended Reduced Downtown/Focused Smart Growth and Employment Alternative having less than significant direct and indirect impacts related to agricultural resources, similar to the proposed project. When compared to the proposed project, this alternative would result in less residential and employment land use development, which would potentially reduce agricultural resource impacts. The Blended Reduced Downtown/Focused Smart Growth and Employment Alternative would not result in any impacts to forestry resources.

Air Quality

The Blended Reduced Downtown/Focused Smart Growth and Employment Alternative would accommodate less residential and employment land use development than the proposed project. Similar to the proposed project, all future development would be required to demonstrate compliance with the strategies and measures adopted as part of the RAQS and SIP, as well as with the requirements of the City and/or SDAPCD. Compliance with these regulations would result in less than significant impacts associated with conflicts to applicable air quality plans, similar to the proposed project. Although less construction and operational emissions would be expected under this alternative due to the reduction in residential and employment land uses, emissions associated with development of the land uses proposed under the Blended Reduced Downtown/Focused Smart Growth and Employment Alternative would still have the potential to result in significant impacts associated criteria pollutants including VOCs, PM_{10}, and $PM_{2.5}$. Mitigation measures listed in Section 4.3, Air Quality, would be required to lessen construction and operational emissions of criteria pollutants. Similar to the proposed project, mitigation would reduce impacts, but not to below a level of significance.

Also similar to the proposed project, the Blended Reduced Downtown/Focused Smart Growth and Employment Alternative would have the potential to result in the exposure of sensitive receptors to substantial amounts of TACs that could increase cancer risks due to construction and operational activities. Although less construction and operational emissions would be expected under this alternative due to a reduction in residential and employment land uses, mitigation measures Air-3 and Air-4 identified for the proposed project would be implemented to reduce direct and cumulative impacts to sensitive receptors to below a significant level. Also similar to the proposed project, the Blended Reduced Downtown/Focused Smart Growth and Employment Alternative would comply with SDAPCD regulations that require odor sources to reduce impacts to nearby sensitive receptors, resulting in a less than significant impact.

Biological Resources

Similar to implementation of the proposed project, future development under the Blended Reduced Downtown/Focused Smart Growth and Employment Alternative would have the potential to directly impact special status plant and wildlife species; riparian habitats and other sensitive communities;

federally protected wetlands; and wildlife movement corridors and nursery sites through construction activities including clearing, grading or grubbing. The Blended Reduced Downtown/Focused Smart Growth and Employment Alternative would result in less residential and employment land use development than the proposed project, which would potentially reduce overall biological resources impacts when compared to the proposed project. All future development under the Blended Reduced Downtown/Focused Smart Growth and Employment Alternative would be required to comply with existing local policies and ordinances related to biological resources, HCPs and NCCPs and existing federal and state regulations that protect plants, wildlife, wetlands and other biological resources. Compliance with these regulations would ensure that this alternative would result in less than significant direct and indirect impacts to biological resources. Also similar to the proposed project, until the City's MHCP Subarea Plan is adopted, the Blended Reduced Downtown/Focused Smart Growth and Employment Alternative would result in a cumulatively considerable significant and unavoidable contribution to impacts to sensitive species, riparian habitats and other sensitive natural communities, and wildlife corridors even with implementation of the mitigation measures identified in Section 4.4, Biological Resources.

Cultural Resources

Similar to the proposed project, the Blended Reduced Downtown/Focused Smart Growth and Employment Alternative would involve demolition, destruction, alteration, structural relocation, grading, trenching or excavation as a result of new private or public development or redevelopment. Activities associated with development of the Blended Reduced Downtown/Focused Smart Growth and Employment Alternative would have the potential to result in substantial adverse changes to historical resources and archaeological resources, although at a lesser level than the proposed project due to a reduction in residential and employment land uses under this alternative. Implementation of the Blended Reduced Downtown/Focused Smart Growth and Employment Alternative would result in significant cultural resources impacts and the mitigation measures identified in Section 4.5, Cultural Resources, would be required to reduce impacts to below a significant level, similar to the proposed project. Similar to the proposed project, the Blended Reduced Downtown/Focused Smart Growth Alternative would result in less than significant impacts related to paleontological resources and human remains, due to compliance with existing regulations.

Geology and Soils

Similar to the proposed project, the Blended Reduced Downtown/Focused Smart Growth and Employment Alternative would comply with existing federal, state and local regulations, such as the CBC, and would result in less than significant impacts associated with seismic related hazards, soil erosion and topsoil loss, soil stability, expansive soils, and wastewater disposal systems.

Greenhouse Gas Emissions

Under the Blended Reduced Downtown/Focused Smart Growth and Employment Alternative, the proposed E-CAP reduction measures and General Plan Update policies would be implemented. Similar to the proposed project, incorporation of the E-CAP reduction measures and the General Plan Update policies would result in less than significant impacts related to compliance with AB 32 and the effects of global climate change on the Blended Reduced Downtown/Focused Smart Growth and Employment Alternative.

Hazards and Hazardous Materials

Similar to the proposed project, the Blended Reduced Downtown/Focused Smart Growth and Employment Alternative would be required to comply with existing applicable federal, state and local regulations related to hazardous materials. Compliance with these regulations would ensure that this alternative would result in less than significant impacts related to the transportation, use and disposal of hazardous materials; accidental release of hazardous materials; hazards to schools; and existing hazardous materials sites. Also similar to the proposed project, the Blended Reduced Downtown/ Focused Smart Growth and Employment Alternative would accommodate low density land uses within the vicinity of public and private airports. Existing emergency response and evacuation plans would be continually updated under this alternative, as currently required, and impacts related to emergency response and evacuation plans would be less than significant. The Blended Reduced Downtown/Focused Smart Growth and Employment Alternative would implement the General Plan Update policies related to wildfires and impacts related to wildfires under this alternative would be less than significant, similar to the proposed project.

Hydrology and Water Quality

Implementation of the Blended Reduced Downtown/Focused Smart Growth and Employment Alternative would increase impermeable surfaces within the project area from the development of future land uses, which would result in hydromodification and contribute to surface water and ground water quality contamination. Therefore, the Blended Reduced Downtown/Focused Smart Growth and Employment Alternative would result in potentially significant impacts to water quality standards and requirements; erosion and siltation; onsite and offsite flooding; and exceeding the capacity of stormwater systems. The Blended Reduced Downtown/Focused Smart Growth and Employment Alternative would result in less residential and employment land use development than the proposed project, which would potentially reduce hydrology and water quality impacts when compared to the proposed project. Similar to the proposed project, land uses allowable under Blended Reduced Downtown/Focused Smart Growth and Employment Alternative would result in dam inundation risks; mudflow risks; and the placement of housing within a 100-year flood hazard area. Compliance with existing regulations would reduce these impacts to a level below significant, similar to the proposed project. Similar to the proposed project, this alternative would result in a less than significant impact to groundwater resources due to a lack of groundwater supplies within the project area. Additionally, the Blended Reduced Downtown/Focused Smart Growth and Employment Alternative would implement the policies proposed under the General Plan Update that would further reduce hydrology and water quality impacts. The Blended Reduced Downtown/Focused Smart Growth and Employment Alternative would result in less than significant impacts to hydrology and water quality.

Land Use

Under this alternative, less residential and employment land use development would occur, as shown in Table 6-6, Blended Reduced Downtown/Focused Smart Growth and Employment Alternative Land Use Comparison. Aside from the reductions in residential and employment lands in certain areas, as shown in the table, the land uses proposed under the General Plan Update would be the same under this alternative. Similar to the proposed project, implementation of the Blended Reduced Downtown/ Focused Smart Growth and Employment Alternative would not result in the physical division of an established community; would not conflict with land use plans, policies and regulations; and would not conflict with HCPs or NCCPs. Land use impacts under the Blended Reduced Downtown/Focused Smart Growth and Employment Alternative would be less than significant.

Minerals

Similar to the proposed project, implementation of the Blended Reduced Downtown/Focused Smart Growth and Employment Alternative would not support growth that would substantially limit the future availability of known mineral resources and would not encroach on areas where future resource recovery sites may occur. This is because the project area is developed with existing land uses that limit the availability of mineral resources and only a small portion of the project area has been designated as containing mineral resources of value. Impacts to mineral resources would be less than significant under the Blended Reduced Downtown/Focused Smart Growth and Employment Alternative, similar to the proposed project.

Noise

During construction or operational activities, the Blended Reduced Downtown/Focused Smart Growth and Employment Alternative would have the potential to expose land uses to noise levels in excess of noise compatibility guidelines. Implementation of the Blended Reduced Downtown/Focused Smart Growth and Employment Alternative would also have the potential to affect groundborne vibration sensitive land uses near the ~~Sprinter~~SPRINTER rail line and where vibration-causing construction equipment would operate within close proximity of vibration-sensitive land uses. Similar to the proposed project, development of land uses allowable under this alternative would permanently increase ambient noise along roadways and would have the potential to temporarily increase ambient noise from construction activity. The mitigation measures identified in Section 4.12, Noise, would be implemented to reduce noise impacts associated with this alternative, although not to a level below significant. When compared to the proposed project, noise impacts under the Blended Reduced Downtown/Focused Smart Growth and Employment Alternative would be reduced due to the reduction in residential and employment land use development and the associated reduction in construction and operational noises. However, impacts would still be considered significant and unavoidable. Similar to the proposed project, impacts related to excessive noise from airports would not occur.

Population and Housing

The Blended Reduced Downtown/Focused Smart Growth and Employment Alternative would result in less residential and employment land use development when compared to the proposed project. This alternative would still achieve the City's RHNA housing allocation that covers the period of January 1, 2013 through December 31, 2020. However, the Blended Reduced Downtown/Focused Smart Growth and Employment Alternative may not satisfy future RHNA allocations. Similar to the proposed project, implementation of the Blended Reduced Downtown/Focused Smart Growth and Employment Alternative would not directly or indirectly induce unplanned population growth, although this alternative would not adequately plan for future growth projected by the City and SANDAG since it would not provide adequate housing for anticipated increases in population. Additionally, the Blended Reduced Downtown/Focused Smart Growth and Employment Alternative would not generate the housing needed to attract the desired mix of entertainment and activities that rely on a denser, more populated urban core. Also similar to the proposed project, implementation of the Blended Reduced Downtown/Focused Smart Growth and Employment Alternative would result in some areas currently designated for residential land uses to be re-designated for non-residential land uses. Impacts associated with the displacement of housing under this alternative would be considered significant and unavoidable, even with compliance with existing regulations, implementation of General Plan Update policies and mitigation measure Pop-1.

Public Services

Implementation of the Blended Reduced Downtown/Focused Smart Growth and Employment Alternative would accommodate an increased population within the project area which would require the provision of new or physically altered fire protection, police protection, schools and library facilities which may result in an adverse environmental impact. The Blended Reduced Downtown/Focused Smart Growth and Employment Alternative would accommodate less residential and employment development than the proposed project, which would reduce the demand for public services and the need to provide new or expanded facilities, the construction of which would have the potential to result in significant environmental impacts. Similar to the proposed project, the Blended Reduced Downtown/Focused Smart Growth and Employment Alternative would implement the proposed General Plan Update policies that reduce impacts to public services and this alternative would result in less than significant public services impacts.

Recreation

Similar to the proposed project, implementation of the Blended Reduced Downtown/Focused Smart Growth and Employment Alternative would accommodate an increase in population over existing conditions within the project area which would result in an increase in the use of existing parks and recreational facilities, resulting in accelerated deterioration of recreational facilities and requiring the construction or expansion of new facilities. The Blended Reduced Downtown/Focused Smart Growth and Employment Alternative would accommodate less residential and employment land use development than the proposed project, which would reduce the demand for recreational facilities and the need to provide new or expanded facilities, the construction of which would have the potential to result in significant environmental impacts. The Blended Reduced Downtown/Focused Smart Growth and Employment Alternative would implement the proposed General Plan Update policies, Downtown Specific Plan policies and E-CAP reduction measures which would reduce recreational impacts to below a level of significance. Therefore, the Blended Reduced Downtown/Focused Smart Growth and Employment Alternative would result in less than significant impacts to recreational resources.

Traffic

Although implementation of the Blended Reduced Downtown/Focused Smart Growth and Employment Alternative would reduce residential and employment land uses and the vehicle trips associated with those land uses; it is anticipated that the majority of traffic and LOS impacts occurring under the proposed project would also occur under the Blended Reduced Downtown/Focused Smart Growth and Employment Alternative. Therefore, traffic and LOS impacts under this alternative would be significant and unavoidable, even with implementation of the mitigation listed in Section 4.16, Transportation and Traffic, similar to the proposed project. When compared to the proposed project, this alternative would result in a reduced level of traffic impacts, due to the reduction in residential and employment land use development and associated vehicular trips, but impacts would still be considered significant and unavoidable. Also similar to the proposed project, implementation of the Blended Reduced Downtown/Focused Smart Growth and Employment Alternative would not result in changes to air traffic patterns that would result in safety hazards. The Blended Reduced Downtown/Focused Smart Growth and Employment Alternative would comply with existing regulations and would implement the proposed General Plan Update policies, which would reduce impacts related to road safety, emergency access, and alternative transportation to a less than significant level, similar to the proposed project.

Utilities and Service Systems

Similar to the proposed project, the Blended Reduced Downtown/Focused Smart Growth and Employment Alternative would accommodate an increased population over existing conditions, which could significantly impact utilities and service systems. The Blended Reduced Downtown/Focused Smart Growth and Employment Alternative would accommodate less residential and employment development than the proposed project, which would reduce demand for utility and service systems when compared to the proposed project. Compliance with existing regulations and implementation of the proposed General Plan Update policies would reduce potentially significant impacts related to the following issues to a less than significant level: 1) demand for wastewater treatment services that may result in a violation in wastewater treatment standards; 2) demand for water and wastewater services, requiring the construction of new facilities; 3) construction of new stormwater facilities to accommodate increased development; 4) additional demand on the existing wastewater system that would result in inadequate capacity to serve the projected demand; and 5) construction or expansion of energy facilities. Similar to the proposed project, future growth under the Blended Reduced Downtown/Focused Smart Growth and Employment Alternative would result in inadequate water supplies due to potential shortages during multiple dry water years and inadequate solid waste disposal facilities due to difficulties in siting and permitting such projects. Also similar to the proposed project, the Blended Reduced Downtown/Focused Smart Growth and Employment Alternative would comply with solid waste regulations and result in a less than significant solid waste regulation impact.

Ability to Accomplish Project Objectives

The Blended Reduced Downtown/Focused Smart Growth and Employment Alternative would meet Objective 2 and 6, partially meet Objectives 1 and 5, and not meet Objectives 3 and 4. This alternative would partially meet Objective 1 because it would establish the same General Plan boundary as the proposed project; however, it would not meet the long-term housing needs of future residents identified in Objective 1. The Blended Reduced Downtown/Focused Smart Growth and Employment Alternative would meet Objective 2 because it would maintain residential densities in outlying areas, preserve and enhance existing neighborhoods, guide some growth towards downtown and along key transportation corridors, and improve circulation and safety for vehicles and pedestrians. The Blended Reduced Downtown/Focused Smart Growth and Employment Alternative would not meet Objective 3 or Objective 4. A reduction in employment land uses under this alternative would result in the inability to create and sustain a strong economic base for the community (Objective 3) or create an economically viable urban downtown and urban core because it would not provide as much residential, retail and office development in the downtown area as the proposed project (Objective 4). This alternative would partially meet Objective 5, because it would achieve a sustainable and integrated system of land use and transportation. However, it would not create compact, mixed use projects, forming urban villages designed to maximize affordable housing to the same extent as the proposed project because multiple areas identified for smart growth residential land uses under the proposed project would be reduced under this alternative. The Blended Reduced Downtown/Focused Smart Growth and Employment Alternative would achieve Objective 6 by implementing the E-CAP measures to reduce energy usage and associated GHG emissions. In addition, this alternative would implement strategies that promote multi-modal transportation and the alternative transportation concepts identified in the Complete Streets Assessment (LLG 2011c).

6.4 Other Planning Alternatives

The following section presents an evaluation of three planning alternatives to the proposed project: 1) ~~Circulation~~Mobility and Infrastructure Element Downtown Couplet Alternative; 2) Promenade Retail Center and Vicinity Study Area Alternative; and 3) Nutmeg Street Alternative. The following alternatives do not meet the purpose of an alternative as identified in CEQA Guidelines Section 15126.6, which states that the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effect of the project. However, these alternatives are considered and evaluated in this section due to interest identified by members of the public, City staff and/or the City Council. For each of the following alternatives, a brief description is provided, followed by a summary impact analysis relative to the proposed project, and an assessment of the degree to which the alternative would meet the proposed project's goals. This alternatives discussion only addresses the environmental issues that would result in different impacts than those identified for the proposed project. The issues that would result in similar impacts under these alternatives as the proposed project are summarized in the alternative description and not discussed in detail. See Sections 4.1 through 4.17 of this EIR for a detailed discussion of the impacts associated with the proposed project which are the same for these alternatives. Table 6-1, Comparison of Alternatives – Environmental Issues, provides a comparison of the significant direct impacts for the proposed project and alternatives. Table 6-2, Comparison of Alternatives – Proposed Project Objectives, provides a summary of the selected alternatives' abilities to meet the proposed project goals.

6.4.1 ~~Circulation~~Mobility and Infrastructure Element Downtown Couplet Alternative

The ~~Circulation~~Mobility and Infrastructure Element Downtown Couplet Alternative would implement the proposed General Plan Update land use plan, goals and policies, the Downtown Specific Plan Update land use plan, goals and policies, and the E-CAP. However, under this alternative the Mobility and Infrastructure Element of the proposed General Plan Update would be realigned so that the existing Valley Parkway and 2nd Avenue one-way couplet would accommodate two-way traffic. Proposed two-way circulation would require the reduction in lanes along each roadway. The roadways would be reduced to one-lane in either direction (two-lane roadways) with on-street parking and bike lanes. Four-lane roadways could not be accommodated because of the limited curb-curb width of approximately 52 feet along most of the couplet. While four-lanes could physically fit, left-turn pockets could not be provided, nor could parking or bike lanes.

Impact Analysis

Impacts Similar to the Proposed Project

The ~~Circulation~~Mobility and Infrastructure Element Downtown Couplet Alternative would result in similar less than significant impacts associated with Aesthetics, Agricultural Resources, Cultural Resources, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use, Mineral Resources, Noise, Population and Housing, Public Services, and Recreation as the proposed project because it would implement the same General Plan Update policies, Downtown Specific Plan Update policies, E-CAP measures and mitigation measures that would reduce

impacts to a less than significant level. Similar to the proposed project, impacts to Biological Resources and Utilities and Service Systems would be significant and unavoidable under this alternative, even with implementation of General Plan Update policies, Downtown Specific Plan Update policies, E-CAP measures, because no feasible mitigation is available to reduce impacts associated with these environmental topics. Increased impacts associated with Air Quality and Traffic are discussed further below.

Air Quality

The ~~Circulation~~Mobility and Infrastructure Element Downtown Couplet Alternative would accommodate the same amount of development as the proposed project and would result in similar air quality impacts when compared to the proposed project. Similar to the proposed project, all future development would be required to demonstrate compliance with the strategies and measures adopted as part of the RAQS and SIP, as well as with the requirements of the City and/or SDAPCD. Compliance with these regulations would result in less than significant impacts associated with conflicts to applicable air quality plans, similar to the proposed project. The same amount of construction emissions would be expected under this alternative because it proposes the same land use plan as the proposed project. However, operational vehicular emissions would be increased because the ~~Circulation~~Mobility and Infrastructure Element Downtown Couplet Alternative would increase traffic impacts and vehicle idling in the vicinity Valley Parkway and 2nd Avenue due to a reduction in travel lanes and associated capacity on these roadways. Construction and operational emissions associated with development of the land uses proposed under the ~~Circulation~~Mobility and Infrastructure Element Downtown Couplet Alternative would result in significant impacts associated criteria pollutants including VOCs, PM_{10}, and $PM_{2.5}$. Mitigation measures listed in Section 4.3, Air Quality, would be required under the ~~Circulation~~Mobility and Infrastructure Element Downtown Couplet Alternative to lessen construction and operational emissions of criteria pollutants. Similar to the proposed project, mitigation would reduce impacts, but not to below a level of significance.

Also similar to the proposed project, the ~~Circulation~~Mobility and Infrastructure Element Downtown Couplet Alternative would have the potential to result in the exposure of sensitive receptors to substantial amounts of TACs that could increase cancer risks due to construction and operational activities. Although the same construction emissions would be expected to occur under this alternative as the proposed project, due to the same land use plan, operational vehicular emissions would be increased because the ~~Circulation~~Mobility and Infrastructure Element Downtown Couplet Alternative would increase traffic impacts and vehicle idling in the vicinity Valley Parkway and 2nd Avenue due to a reduction in travel lanes and associated capacity on these roadways. Mitigation measures Air-3 and Air-4 would be implemented to reduce direct and cumulative impacts to sensitive receptors to below a significant level. Also similar to the proposed project, the ~~Circulation~~Mobility and Infrastructure Element Downtown Couplet Alternative would comply with SDAPCD regulations that require odor sources to reduce impacts to nearby sensitive receptors, resulting in a less than significant impact.

Traffic

A Valley Parkway/2nd Avenue Couplet Evaluation – Potential Two-Way Circulation Memo was prepared by LLG Engineers (2011d). This memo evaluated the transportation and traffic impacts for the ~~Circulation~~Mobility and Infrastructure Element Downtown Couplet Alternative. The memo is included as Appendix I4, Downtown Couplet Analysis, to this EIR. Implementation of the ~~Circulation~~Mobility and Infrastructure Element Downtown Couplet Alternative would require revision of the existing street

system from one-way to two-way circulation which would involve major geometric modifications to existing intersections, including changing curb/gutter alignments, and installing extensive traffic signal equipment/modifications. The Valley Parkway/2nd Avenue Couplet Evaluation determined that implementation of the ~~Circulation~~Mobility and Infrastructure Element Downtown Couplet Alternative would require a reduction in lanes along Valley Parkway and 2nd Avenue in either direction and would result in severe deficiencies in daily level of service (LOS) along both roadways.

To evaluate the volumes along the one-way couplet, assuming a change to two-way circulation, LLG evaluated the existing average daily traffic (ADT), and the peak hour volumes at the following six key intersections:

1. Valley Parkway/Escondido Boulevard
2. Valley Parkway/Broadway
3. Valley Parkway/Juniper Street
4. 2nd Avenue/Escondido Boulevard
5. 2nd Avenue/Broadway
6. 2nd Avenue/Juniper Street

Acceptable LOS D or better operations were calculated at all of the key intersections under existing conditions, except for the Valley Parkway/Escondido Boulevard intersection, which was calculated to operate at LOS E during the PM peak hour.

In summary, implementation of the ~~Circulation~~Mobility and Infrastructure Element Downtown Couplet Alternative would result in roadway segments and intersections in the downtown area operating at unacceptable LOS levels. When compared to the proposed project, the ~~Circulation~~Mobility and Infrastructure Element Downtown Couplet Alternative would result in additional traffic and LOS impacts.

For areas outside of the City's downtown core, the ~~Circulation~~Mobility and Infrastructure Element Downtown Couplet Alternative would be expected to result in similar traffic and LOS impacts as the proposed project. Similar to the proposed project, traffic and LOS impacts under this alternative would be expected to be significant and unavoidable. Also similar to the proposed project, implementation of the ~~Circulation~~Mobility and Infrastructure Element Downtown Couplet Alternative would not result in changes to air traffic patterns that would result in safety hazards.

Due to the major geometric modifications that would be required to implement this alternative, it would not be consistent with the concepts identified in the Complete Streets Assessment (LLG 2011c) because it would reduce the availability of roadway rights-of-way to be used for intersection bulb outs, bicycle lanes, bus turnouts, sidewalks and other pedestrian, bicycle and transit facilities. Therefore, under the ~~Circulation~~Mobility and Infrastructure Element Downtown Couplet Alternative, impacts associated with road safety, emergency access, and alternative transportation would be greater than those identified for the proposed project. The Complete Streets Assessment (LLG 2011c) is provided as Appendix I3 of this EIR.

Ability to Accomplish Project Objectives

The Downtown Couplet Alternative would meet all of the proposed project's objectives because under this alternative, the land use plan, goals and policies proposed in the General Plan Update would remain the same and only the Valley Parkway/2nd Avenue Couplet would be realigned to accommodate two-

way traffic. Due to the fact that this alternative implements the same land use plan as the proposed project, without reductions in residential or employment land uses, the ~~Circulation~~Mobility and Infrastructure Element Downtown Couplet Alternative would meet all of the objectives identified for the proposed project.

6.4.2 Promenade Retail Center and Vicinity Alternative

The Promenade Retail Center and Vicinity Alternative would implement the proposed General Plan Update goals and policies, the Downtown Specific Plan Update goals and policies, and the E-CAP reduction measures. However, under this alternative, mixed use office land uses south of 9th Avenue within the Promenade Retail Center and Vicinity Target Area would be increased by 100,000 sf. Total employment land uses throughout the proposed project planning area would be increased to 13,750,000 sf under this alternative. The same number of dwelling units would be accommodated in the Promenade Retail Center and Vicinity Target Area (628 dwelling units) and throughout the entire proposed project planning area (9,924 dwelling units) as the proposed project.

Impact Analysis

Impacts Similar to the Proposed Project

The Promenade Retail Center and Vicinity Alternative would result in similar less than significant impacts associated with Aesthetics, Agricultural Resources, Cultural Resources, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use, Mineral Resources, Population and Housing, and Recreation as the proposed project because it would implement the same General Plan Update policies, Downtown Specific Plan Update policies, E-CAP measures and mitigation measures that would reduce impacts to a less than significant level. Similar to the proposed project, impacts to Biological Resources and Utilities and Service Systems would be significant and unavoidable under this alternative, even with implementation of General Plan Update policies, Downtown Specific Plan Update policies, E-CAP measures, because no feasible mitigation is available to reduce impacts associated with these environmental topics. Increased impacts associated with Air Quality, Noise, Public Services, and Traffic are discussed further below.

Air Quality

The Promenade Retail Center and Vicinity Alternative would accommodate more mixed use office development than the proposed project. Similar to the proposed project, all future development would be required to demonstrate compliance with the strategies and measures adopted as part of the RAQS and SIP, as well as with the requirements of the City and/or SDAPCD. Compliance with these regulations would result in less than significant impacts associated with conflicts to applicable air quality plans, similar to the proposed project. More construction and operational emissions would be expected under this alternative due to the increase in mixed office land uses. Construction and operational emissions associated with development of the land uses proposed under the Promenade Retail Center and Vicinity Alternative would result in significant impacts associated with criteria pollutants including VOCs, PM_{10}, and $PM_{2.5}$. Mitigation measures listed in Section 4.3, Air Quality, would be required to lessen construction and operational emissions of criteria pollutants. Similar to the proposed project, mitigation would reduce impacts, but not to below a level of significance.

Also similar to the proposed project, the Promenade Retail Center and Vicinity Alternative would have the potential to result in the exposure of sensitive receptors to substantial amounts of TACs that could increase cancer risks due to construction and operational activities. More construction and operational emissions would be expected under this alternative, when compared to the proposed project, due to the increase in mixed office land uses. Mitigation measures Air-3 and Air-4 would be implemented to reduce direct and cumulative impacts to sensitive receptors to below a significant level. Also similar to the proposed project, the Promenade Retail Center and Vicinity Alternative would comply with SDAPCD regulations that require odor sources to reduce impacts to nearby sensitive receptors, resulting in a less than significant impact.

Noise

During construction or operational activities, the Promenade Retail Center and Vicinity Alternative would have the potential to expose land uses to noise levels in excess of noise compatibility guidelines. Similar to the proposed project, development of land uses allowable under the Promenade Retail Center and Vicinity Alternative would permanently increase ambient noise along roadways and would have the potential to temporarily increase ambient noise from construction activity. The mitigation measures identified in Section 4.12, Noise, would be implemented to reduce impacts associated with the Promenade Retail Center and Vicinity Alternative, although not to a level below significant. Therefore, impacts would be considered significant and unavoidable. When compared to the proposed project, noise impacts under the Promenade Retail Center and Vicinity Alternative would be greater due to the increase in mixed use office land uses and the associated increase in construction and operational noises, with the exception of impacts related to excessive noise from airports, which would result in similar less than significant impacts as the proposed project.

Public Services

The Promenade Retail Center and Vicinity Alternative would accommodate the same population as the proposed project and would be expected to result in similar impacts to schools and library facilities, when compared to the proposed project. However, demand for fire and police services would be increased as compared to the proposed project, since this alternative would result in an increase in mixed use office land uses that would require fire and police protection. Similar to the proposed project, the Promenade Retail Center and Vicinity Alternative would implement the proposed General Plan Update policies that reduce impacts to public services and would result in less than significant public services impacts.

Traffic

Implementation of the Promenade Retail Center and Vicinity Alternative would increase mixed use office land uses and the vehicle trips associated with these land uses. Under the Promenade Retail Center and Vicinity Alternative, it is anticipated that the traffic and LOS impacts occurring under the proposed project would be increased due to the increase in vehicle trips associated with this alternative. Similar to the proposed project, traffic and LOS impacts under this alternative would be significant and unavoidable, even with implementation of the mitigation listed in Section 4.16, Transportation and Traffic. Also similar to the proposed project, implementation of the Promenade Retail Center and Vicinity Alternative would not result in changes to air traffic patterns that would result in safety hazards. The Promenade Retail Center and Vicinity Alternative would comply with existing regulations and would implement the proposed General Plan Update policies, which would reduce impacts related to road

safety, emergency access, and alternative transportation to a less than significant level, similar to the proposed project.

Ability to Accomplish Project Objectives

The Promenade Retail Center and Vicinity Alternative would meet all of the objectives identified for the proposed project. An increase in office employment uses under this alternative would result in the increased ability of this alternative to create and sustain a strong economic base for the community (Objective 3) and create an economically viable urban downtown and core (Objective 4). The Promenade Retail Center and Vicinity Alternative would also result in the establishment of a General Plan boundary that accommodates the goals of Objective 1 and would guide additional growth towards downtown and along key transportation corridors, as stated in Objective 2. Further, under this alternative, smart growth strategies and the E-CAP would be implemented, which would result in the accomplishment of Objectives 5 and 6.

6.4.3 Nutmeg Street Alternative

The Nutmeg Street Alternative would implement the proposed General Plan Update goals and policies, the Downtown Specific Plan Update goals and policies, and the E-CAP reduction measures. Under this alternative, new office employment land uses would replace proposed residential land uses within the Nutmeg Street Study Area. The proposed project identifies the development of 40 residential dwelling units within this study area. The Nutmeg Street Alternative would accommodate 100,000 sf of new office employment land uses in this study area, which be developed instead of the 40 dwelling units. Therefore, this alternative would result in a total of 13,750,000 SF of employment land uses and 9,884 dwelling units throughout the entire proposed project planning area.

Impact Analysis

Impacts Similar to the Proposed Project

The Nutmeg Street Alternative would result in similar less than significant impacts associated with Aesthetics, Agricultural Resources, Cultural Resources, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use, Mineral Resources, Population and Housing, and Recreation as the proposed project because it would implement the same General Plan Update policies, Downtown Specific Plan Update policies, E-CAP measures and mitigation measures that would reduce impacts to a less than significant level. Similar to the proposed project, impacts to Biological Resources and Utilities and Service Systems would be significant and unavoidable under this alternative, even with implementation of General Plan Update policies, Downtown Specific Plan Update policies, E-CAP measures, because no feasible mitigation is available to reduce impacts associated with these environmental topics. Increased impacts associated with Air Quality, Noise, Public Services, and Traffic are discussed further below.

Air Quality

The Nutmeg Street Alternative would accommodate more office development and slightly less residential development than the proposed project and would result in similar air quality impacts, when compared to the proposed project. Similar to the proposed project, all future development would be required to demonstrate compliance with the strategies and measures adopted as part of the RAQS and

SIP, as well as with the requirements of the City and/or SDAPCD. Compliance with these regulations would result in less than significant impacts associated with conflicts to applicable air quality plans, similar to the proposed project. Increased construction and operational emissions would be expected under this alternative due to the construction of an additional 100,000 sf of office employment land uses. However, this increase would be partially offset by the reduction in development of 40 residential dwelling units. Similar to the proposed project, emissions associated with development of the land uses proposed under the Nutmeg Street Alternative would result in significant impacts associated with criteria pollutants including VOCs, PM_{10}, and $PM_{2.5}$. Mitigation measures listed in Section 4.3, Air Quality, would be required to lessen construction and operational emissions of criteria pollutants. Similar to the proposed project, mitigation would reduce impacts, although not to a less than significant level. Therefore, impacts would remain significant and unavoidable.

Also similar to the proposed project, the Nutmeg Street Alternative would have the potential to result in the exposure of sensitive receptors to substantial amounts of TACs that could increase cancer risks due to construction and operational activities. Increased construction and operational emissions would be expected under this alternative due to the increase in employment land use development, which would only be partially offset by the reduction in development of 40 residential units. Mitigation measures Air-3 and Air-4 would be implemented to reduce direct and cumulative impacts to sensitive receptors to below a significant level, similar to the proposed project. Also similar to the proposed project, the Nutmeg Street Alternative would comply with SDAPCD regulations that require odor sources to reduce impacts to nearby sensitive receptors, resulting in a less than significant impact.

Noise

During construction or operational activities, the Nutmeg Street Alternative would have the potential to expose land uses to noise levels in excess of noise compatibility guidelines. Similar to the proposed project, development of land uses allowable under the Nutmeg Street Alternative would permanently increase ambient noise along roadways and would have the potential to temporarily increase ambient noise from construction activity. The mitigation measures identified in Section 4.12, Noise, would be implemented to reduce impacts associated with the Nutmeg Street Alternative. Similar to the proposed project, compliance with existing regulations and implementation of the proposed General Plan Update policies would reduce noise impacts, although not to a level below significant. When compared to the proposed project, noise impacts under the Nutmeg Street Alternative would be slightly increased due to the increase in 100,000 sf of office employment land uses, which would only be partially offset by the reduction of 40 residential land uses. Even with implementation of feasible mitigation measures, impacts would be significant and unavoidable. Similar to the proposed project, impacts related to excessive noise from airports would not occur.

Public Services

Implementation of the Nutmeg Street Alternative would accommodate a slightly reduced population (40 fewer dwelling units) as compared to the proposed project and would be expected to result in similar impacts to schools and library facilities as the proposed project. However, demand for fire and police services would be increased as compared to the proposed project, since this alternative would increase office employment land uses by 100,000 sf, which would require additional fire and police protection. Similar to the proposed project, the Nutmeg Street Alternative would implement the proposed General Plan Update policies that reduce impacts to public services and would result in less than significant public services impacts.

Traffic

Implementation of the Nutmeg Street Alternative would add 100,000 sf of office employment land uses and reduce residential development by 40 dwelling units in the Nutmeg Street Study Area. When compared to the proposed project, the Nutmeg Street Alternative would result in a slight increase in traffic impacts, due to the increase in employment lands and associated vehicular trips, which would only be partially offset by the proposed reduction of 40 dwelling units and associated vehicular trips. Therefore, similar to the proposed project, traffic and LOS impacts under this alternative would be significant and unavoidable, even with implementation of the mitigation measures listed in Section 4.16, Traffic. Also similar to the proposed project, implementation of the Nutmeg Street Alternative would not result in changes to air traffic patterns that would result in safety hazards. The Nutmeg Street Alternative would comply with existing regulations and would implement the proposed General Plan Update policies, which would reduce impacts related to road safety, emergency access, and alternative transportation, similar to the proposed project.

Ability to Accomplish Project Objectives

The Nutmeg Street Alternative would meet all six of the objectives identified for the proposed project. An increase in employment land uses under this alternative would result in the increased ability to create and sustain a strong economic base for the community (Objective 3) and create an economically viable urban downtown and core (Objective 4). The Nutmeg Street Alternative would result in the establishment of a General Plan boundary that accommodates the goals of Objective 1 and would guide additional growth towards downtown and along key transportation corridors as outlined in Objective 2. Further, under this alternative, smart growth strategies and the E-CAP reduction measures would be implemented, which would result in the accomplishment of Objectives 5 and 6.

6.5 Environmentally Superior Alternative

According to Section 15126.6(e)(2) of the CEQA Guidelines, an EIR is required to identify the environmentally superior alternative, which is the alternative having the potential for the fewest significant environmental impacts, from among the range of reasonable alternatives that are evaluated in the EIR. Table 6-1, Comparison of Alternatives – Environmental Issues, provides a summary comparison of the alternatives evaluated in this EIR with the purpose of highlighting whether the alternative would result in a similar, greater, or lesser impact compared to the proposed project. As shown in this table, the Reduced Employment Alternative is the Environmentally Superior Alternative. The Reduced Employment Alternative would accommodate a total of 7,457,000 sf of employment land uses or 6,193,000 sf less employment land uses than the proposed project. Because the overall employment land use development in the project area would be decreased compared to the proposed project, impacts associated with scenic vistas; scenic resources; visual character and quality; lighting and glare; direct conversion of agricultural resources; indirect conversion of agricultural and forestry resources; air quality violations; sensitive receptors; special status plant and wildlife species; riparian habitat and other sensitive natural communities; wildlife movement corridors and nursery sites; historical resources; archeological resources; excessive noise levels; excessive groundborne vibration; permanent and temporary ambient noise levels; displacement of housing and people; fire and police protection; traffic and level of service standards; wastewater treatment requirements; new water and wastewater treatment facilities; sufficient stormwater drainage facilities; adequate water supplies;

adequate wastewater facilities; sufficient landfill capacity; solid waste regulations; and energy would be less than those identified for the proposed project.

The Reduced Employment Alternative would meet Objectives 1, 2, 5 and 6. The Reduced Employment Alternative would be consistent with Objective 1 because it would establish the same General Plan boundary as the proposed project, meet the housing needs of future residents. The Reduced Employment Alternative would meet Objective 2 because it would maintain residential densities in outlying areas to accommodate growth, preserve existing neighborhoods, guide additional growth towards downtown and along key transportation corridors and improve circulation and safety. This alternative would achieve Objectives 5 and 6 by implementing the E-CAP measures to reduce energy usage and associated GHG emissions. In addition, this alternative would implement SANDAG's smart growth strategies that promote multi-modal transportation and the alternative transportation concepts identified in the Complete Streets Assessment (LLG 2011c). The Reduced Employment Alternative would not meet Objective 3 or Objective 4. A reduction in employment land uses under this alternative would result in the inability to create and sustain a strong economic base for the community (Objective 3) or create an economically viable urban downtown and urban core (Objective 4).