

# 7. Alternatives to the Proposed Project

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## 7.1 INTRODUCTION

### 7.1.1 Purpose and Scope

The California Environmental Quality Act (CEQA) requires that an environmental impact report (EIR) include a discussion of reasonable project alternatives that would “feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any significant effects of the project, and evaluate the comparative merits of the alternatives” (CEQA Guidelines § 15126.6[a]). As required by CEQA, this chapter identifies and evaluates potential alternatives to the proposed project.

Section 15126.6 of the CEQA Guidelines explains the foundation and legal requirements for the alternatives analysis in an EIR. Key provisions are:

- “[T]he discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.” (15126.6[b])
- “The specific alternative of ‘no project’ shall also be evaluated along with its impact.” (15126.6[e][1])
- “The no project analysis shall discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. If the environmentally superior alternative is the ‘no project’ alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.” (15126.6[e][2])
- “The range of alternatives required in an EIR is governed by a ‘rule of reason’ that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project.” (15126.6[f])
- “Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries..., and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent)” (15126.6[f][1]).

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- “Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR.” (15126.6[f][2][A])
- “An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative.” (15126.6[f][3])

For each development alternative, this analysis:

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

According to Section 15126.6(d) of the CEQA Guidelines, “[i]f an alternative would cause...significant effects in addition those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed.”

### 7.1.2 Project Objectives

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

- **Objective 1:** Revise the Los Rios Specific Plan to add a Commercial Core Planning Area to encourage the development of commercial opportunities that honor the rich history of the Los Rios neighborhood and surrounding uses.
- **Objective 2:** Redevelop the project site with a complementary mix of commercial and office uses.
- **Objective 3:** Provide retail and office opportunities for residents and visitors to San Juan Capistrano that are compatible with the surrounding land uses.
- **Objective 4:** Establish contemporary family-oriented uses that increase the City’s revenue-generating tax base through new sales tax and increased property tax revenues.
- **Objective 5:** Promote business activity in the Los Rios Specific Plan area through creation of facilities responsive to community needs.
- **Objective 6:** Implement employment-generating land uses that would create new jobs available to City residents.

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- **Objective 7:** Encourage alternative modes of travel through enhancement of bicycle and pedestrian connectivity, and increasing the number of employees within a transit priority area within a quarter mile of the San Juan Capistrano Metrolink Station.
- **Objective 8:** Incorporate sustainable development practices addressing energy efficiency, including compliance with green building standards, the state model water efficient landscape ordinance, and water and energy efficient design elements.
- **Objective 9:** Enhance the visual attributes of the project site and the greater Los Rios area through implementation of design guidelines, landscape design, and signage requirements.

### 7.2 SIGNIFICANT AND UNAVOIDABLE IMPACTS

Pursuant to CEQA Guidelines Section 15126.6[b], alternatives to the proposed project include those that are capable of avoiding or substantially lessen any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly. Therefore, based on the analysis contained in Chapter 5, *Environmental Analysis*, the proposed project would result in significant environmental effects prior to mitigation on the topics of air quality, biological resources, cultural resources, noise, transportation and traffic, tribal cultural resources, and utilities and service systems. Following mitigation, however, all impacts with the exception of construction-related noise would be reduced to less than significant levels. With mitigation, the proposed project would have one significant and unavoidable temporary construction-related noise impact.

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

The following is a discussion of the land use alternatives considered during the scoping and planning process and the reasons why they were not selected for detailed analysis in this EIR.

#### 7.3.1 Alternative Development Areas

CEQA requires that the discussion of alternatives focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project. The key question and first step in the analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR (CEQA Guidelines § 15126[5][B][1]).

Three alternative sites were considered—(1) the Camino Real Playhouse, (2) the Mission Grill, and (3) the Hotel Capistrano sites.

- **Camino Real Playhouse:** The Camino Real Playhouse site would require additional demolition activities resulting in increased significant construction-related impacts to air quality, noise, and traffic. Additionally,

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the City is currently under an exclusive negotiating agreement to develop the site for a mix of uses, including theater, commercial and office uses.

- **The Mission Grill:** The approximate one-third acre Mission Grill site at 31681 Camino Capistrano, lacks adequate acreage to accommodate the proposed project. Additionally, the project site is within close proximity to a sensitive receptor. The Mission Grill site is about 70 feet directly west and across Camino Capistrano from Mission San Juan Capistrano Historic Landmark and Museum. The church at the mission is the oldest building in California still in use. Visitors to the Mission and museum expect a quiet noise environment to experience enjoyment and contemplation of this religious and historical landmark. Due to the site's proximity to sensitive receptors, development of the proposed project at this location would not eliminate the one significant and unavoidable impact (construction-related noise) associated with the project.
- **Hotel Capistrano:** The 3.16-acre Hotel Capistrano site is at 31872, 31878, and 31882 Camino Capistrano. Although land use designations for this site would allow uses contemplated by the proposed project, the project is not under the ownership or control of the project applicant. Furthermore, substantial increases in noise levels due to construction noise would be similar to the proposed project, since the nearest receptors in the vicinity of the Hotel Capistrano site are the Egan House, within 25 feet of the project boundary, and the Esslinger Building, approximately 50 feet from the project boundary.

The three alternative sites were eliminated from further consideration because they either do not have the ability to accommodate the project or would not eliminate significant and unavoidable adverse impacts.

### 7.3.2 Reduced Construction Noise Alternatives

The proposed project would result in one significant and unavoidable short-term construction noise impact. Noise levels during construction would reach a maximum of 79 dBA Leq at 115 feet from the source, increasing noise levels over ambient conditions by 20–27 dBA Leq during the loudest periods of construction. All feasible mitigation measures (see Mitigation Measure N-1) have been incorporated into the proposed project, which will substantially reduce temporary noise impacts at sensitive receptors during construction activities. A temporary noise barrier would reduce construction-related noise by approximately 10 dBA for ground-level receptors with no line-of-site to construction activity. Therefore, maximum noise levels with mitigation can be reduced to approximately 69 dBA at 115 feet.

Project alternatives were evaluated to determine if any development alternative at the project site could eliminate the significant and unavoidable construction noise impact. An alternative project design or layout would not substantially reduce this impact, because there is no commercial and office development of a size or distance from sensitive receptors that would eliminate the substantial periodic increase in ambient noise levels during construction. The existing ambient noise levels in the study area are relatively low for an urban community at 52-59 dBA Leq (see Table 5.10-5), therefore, the threshold to achieve a substantial increase in noise levels from construction is lower than most urbanized neighborhoods. Furthermore, single family residential development is adjacent to the project's eastern boundary, which is approximately 300–350 feet

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from the site's western boundary. At a distance of 325 feet, sensitive receptors would still experience substantial periodic noise levels of up to 70 dBA Leq, which is 11–18 dBA Leq above ambient conditions.

A phased or shortened construction schedule was also evaluated to potentially reduce substantial periodic noise levels. However, substantially shortening the project's 17-month construction schedule would result in a significant increase in construction-related air quality emissions due to the need for additional construction vehicles/equipment and conflicts with Mitigation Measures AQ-1 and AQ-2 (limiting the daily haul trips). There are no other project alternatives that would result in a substantial reduction in construction-related noise levels.

### 7.4 ALTERNATIVES SELECTED FOR FURTHER ANALYSIS

Based on the criteria listed above, and in addition to the alternatives considered and rejected, the following three alternatives have been determined to represent a reasonable range of alternatives which have the potential to feasibly attain most of the basic objectives of the project but which may avoid or substantially lessen any of the significant effects of the project. These alternatives are analyzed in detail in the following sections.

- No Project/No Build Alternative
- No Project/Existing Los Rios Specific Plan Alternative
- Reduced Intensity Alternative

An EIR must identify an “environmentally superior” alternative and where the No Project Alternative is identified as environmentally superior, the EIR is then required to identify as environmentally superior an alternative from among the others evaluated. Each alternative's environmental impacts are compared to the proposed project and determined to be environmentally greater, less than, or similar to the project's impacts. However, only those impacts found significant and unavoidable are used in making the final determination of whether an alternative is environmentally superior or inferior to the proposed project. Only one impact involving temporary construction noise was found to be significant and unavoidable. Section 7.7 identifies the Environmentally Superior Alternative.

### 7.5 NO PROJECT/NO BUILD ALTERNATIVE

CEQA requires an analysis of the No Project Alternative in accordance with CEQA Guidelines Section 15126.6(e). This alternative evaluates what would occur if the project is not approved, and is based upon existing conditions and available infrastructure. The No Project/No Build Alternative assumes that the proposed amendment to the Los Rios Specific Plan would not be adopted and no new development would occur. The current nursery uses would continue to operate and no demolition of the existing structures would occur.

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### 7.5.1 Aesthetics

Under the No Project/No Build Alternative, no new development would occur on the project site and the existing nursery would remain. Therefore, the existing visual character and resources would remain as is. However, the various visual improvements that would be introduced through development of the site and the amendment to the Los Rios Specific Plan (e.g., landscaping, building form, architectural design, materials and finishes, and lighting) would not occur under this alternative. The commercial core planning area, which is intended to be a comprehensively designed project that highlights the agrarian history of the area, would not occur. Additionally, the proposed project's aesthetic and visual resource impacts were determined to be less than significant. No favorable impact to aesthetics would occur under this alternative, and impacts under this alternative would be greater compared to the proposed project but remain less than significant.

### 7.5.2 Air Quality

Under this alternative, no new development would occur, and no new construction or demolition activities would occur. Therefore, the proposed project's potentially significant construction-related emissions impacts requiring mitigation would be eliminated under this alternative.

Since the No Project/No Build Alternative would not increase traffic, associated air emissions would remain as is (that is, no impact would occur) and less than the proposed project. Although the proposed project would not result in any significant and unavoidable air quality impacts, air quality impacts under this alternative would be reduced compared to the proposed project and be less than significant.

### 7.5.3 Biological Impacts

The No Project/No Build Alternative would not result in any new development, and potential impacts to active bird nests due to tree removal would be eliminated. No impact would occur, and impacts would be reduced compared to the proposed project.

### 7.5.4 Cultural Resources

Under the No Project/No Build Alternative, no new development would occur within the project site; this alternative would not result in the potential to encounter paleontological and archaeological during grading activities. However, this alternative would not enhance River Street, a historic resource, by rehabilitating the pathway to its original historic condition as an unpaved road. On balance, since no development would occur, there would be no potential to damage cultural resources, and impacts would be reduced compared to the proposed project.

### 7.5.5 Geology and Soils

No new construction activities, including demolition and grading, would occur under the No Project/No Build Alternative. Therefore, there would be no potential for additional workers, buildings, and structures to experience seismic ground shaking, or other geologic hazard. However, the proposed project's impacts to geology and soils were determined to be less than significant provided that existing regulations and standard

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conditions are implemented prior to and during building construction. Impacts to geology and soils would be reduced compared to the proposed project.

### 7.5.6 Greenhouse Gas Emissions

The No Project/No Build Alternative assumes that no new development would occur. Although the proposed project would not result in any significant impacts, this alternative would reduce GHG emissions that would be generated from project construction and operation, which totaled 2,784 MTCO<sub>2</sub>e per year. Therefore, impacts under this alternative would be reduced compared to the proposed project and less than significant.

### 7.5.7 Hazards and Hazardous Materials

Under this alternative, no new development would occur and the existing nursery would continue to operate. No recognized environmental concerns were documented for the project site. Additionally, the proposed project's impacts to hazards and hazardous materials were determined to be less than significant provided that existing regulations and standard conditions are implemented during construction and operation. Furthermore, any existing hazardous materials use and transport associated with the nursery is minimal and would be required to continue complying with existing state and local regulations. Therefore, impacts of this alternative would be less than significant and would be the same compared to the proposed project.

### 7.5.8 Hydrology and Water Quality

Existing water quality conditions, groundwater supplies, drainage patterns, and runoff amounts would remain as is under this alternative since no new development would occur. This alternative would not introduce new sources of water pollutants to the project area (from either construction or operations phases of development projects). However, this alternative would not include the development of new low-impact development, source control, site design, and treatment control best management practices (BMPs) to minimize runoff and water pollution. These BMPs are required measures that would occur under the proposed project and have a beneficial impact on stormwater quality. Overall, hydrology and water quality impacts would be slightly greater under this alternative but would remain less than significant.

### 7.5.9 Land Use and Planning

Given that the proposed amendment to the Specific Plan would not be adopted, this alternative would not require a general plan amendment and code amendment. The existing general plan and zoning designations on the project site would remain (Specific Plan/Precise Plan and Low Density Commercial, respectively) and implementation of the commercial core planning area would not be allowed. However, this alternative would not allow the amendment to the Specific Plan's new development standards and design guidelines that enhance the character, mobility, and connectivity of the project site. Additionally, the proposed project's impacts to land use and planning were determined to be less than significant. Overall, land use impacts of the No Project Alternative would be less than significant and similar to those of the proposed project.

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### 7.5.10 Noise

Under this alternative, no new development would occur. Therefore, this alternative would eliminate the proposed project's temporary significant and unavoidable construction-related noise impacts. Additionally, no new trips would be generated by this alternative and no new operation-related noise impacts would occur. However, no significant operational noise impacts were identified with the proposed project. No impact would occur under this alternative and impacts would be reduced as compared to the proposed project.

### 7.5.11 Public Services

The Orange County Fire Authority (OCFA) currently provides fire protection services to the project site. Although no new construction would occur under this alternative, the new buildings would be constructed to meet the latest building and fire codes and would be fully equipped with fire sprinkler and hydrant systems. Additionally, the proposed project would not result in significant impacts to fire protection services. Impacts to fire services would not change significantly under this alternative compared to the proposed project. The onsite police protection services are provided by the Orange County Sheriff Department (OCSD). OCSD indicated that it has adequate stations, staff, and equipment to serve the proposed project; and impacts would be less than significant. Since no new construction or employees would occur onsite, impacts related to fire and police services would be less than the proposed project and less than significant.

### 7.5.12 Transportation and Traffic

The proposed project would generate 2,711 vehicle trips per day (152 in the AM peak hour and 176 in the PM peak hour); the proposed project would not cause an inadequate level of service for any study area intersection, segment, or CMP ramps under Existing Plus Project or cumulative conditions. Additionally, the addition of project traffic would not exceed the required stacking/storage lengths for Caltrans off-ramps at the I-5 at Ortega Highway. However, the project would exceed eastbound left-turn storage on Del Obispo at Paseo Adelanto at Paseo Adelanto at Del Obispo under General Plan Buildout conditions, and would result in a temporary construction-related traffic impact.

Under this alternative, no development would occur on the project site and the minimal vehicle trips associated with the nursery would continue to occur. Since this alternative would not add any vehicle trips to the roadway system or involve construction activities, the significant impacts of the proposed project would be eliminated. Traffic impacts would be reduced and no impact would occur.

### 7.5.13 Tribal Cultural Resources

Under this alternative, no ground disturbances would occur. Therefore, there would be no potential for encountering tribal cultural resources during grading activities. Tribal cultural resources impacts of this alternative would be reduced compared to the proposed project and less than significant.



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### 7.5.14 Utilities, Service Systems, and Energy

The project site is served by existing infrastructure, and existing utilities and service systems are expected to continue to operate adequately. Due to the increase in land use intensity onsite under the proposed project, it would require improvements and upgrades to existing utilities and service systems (e.g. upsizing wastewater pipe segment D15704 along Los Rios Street; and upgrading/extending water, wastewater and storm drain pipes and fixtures to tie into off-site connections). Since no new development would occur, the No Project/No Build Alternative would reduce impacts to utility services, including water, wastewater, storm drains, solid waste compared to the proposed project.

Additionally, energy demand for electricity, natural gas, and fuel would remain as is and reduced compared to the project. Compared to the proposed project, impacts on energy would be reduced and remain less than significant.

### 7.5.15 Conclusion

#### Ability to Reduce Environmental Impacts

The No Project/No Build Alternative would lessen environmental impacts in the areas of air quality, biological resources, cultural resources, geology and soils, GHG emissions, noise, public services, transportation and traffic, tribal cultural resources, and utilities, service systems, and energy. This alternative would have greater environmental impacts related to aesthetics and hydrology and water quality and have similar impacts in the area of hazards and hazardous materials and land use and planning. Additionally, this alternative would eliminate the proposed project's significant and unavoidable impact to construction-related noise. Therefore, overall this alternative is considered environmentally superior when compared to the proposed project.

#### Ability to Achieve Project Objectives

Implementation of the No Project/No Build Alternative would ultimately stop any new development from occurring within in the project site beyond what is already on the ground. Therefore, none of the project objectives would be achieved under this alternative.

The No Project/No Build Alternative would not provide any of the project benefits that would occur with adoption of the amendment to the Specific Plan, including encouraging ridership within a transit priority area, enhancement of character and design, improved mobility and connectivity, water quality enhancement, sustainable development and design, and economic revitalization.

## 7.6 NO PROJECT/EXISTING LOS RIOS SPECIFIC PLAN ALTERNATIVE

Pursuant to CEQA Guidelines Section 15126.6(e)(3)(A), when a project is the revision of an existing regulatory plan, the “no project” alternative assumes continuation of the existing plan, policy, or operation into the future. Therefore, under the No Project/Existing Los Rios Specific Plan Alternative, the current general plan land uses and zoning would remain in effect. The current Specific Plan designates the site as Low

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Density Commercial (LDC) development, which allows land uses such as nurseries, open markets, and arts and crafts workshops, display and retail, and office uses fronting Del Obispo. The No Project/Existing Los Rios Specific Plan Alternative assumes that the project site would be developed with an approximate 36,000 square foot nursery/garden center with a building height of up to 30 feet. This alternative would generate 2,452 daily, 87 AM peak hour, and 250 PM peak hour trips.<sup>1</sup>

### 7.6.1 Aesthetics

Aesthetic impacts associated with the No Project/Existing Los Rios Specific Plan Alternative would be less than the proposed project because it would have a reduced building footprint and height (30-foot maximum compared to a 35-foot maximum proposed by the project). The provisions of the maximum heights, setbacks, building forms, and other development standards and design guidelines of the Los Rios Specific Plan would still apply. Therefore, impacts would be less than the proposed, but would remain less than significant.

### 7.6.2 Air Quality

Construction-related air quality impacts under the No Project/Existing Los Rios Specific Plan Alternative would be reduced compared to the proposed project because building square footage would be reduced. However, it was determined that mitigation would reduce construction-related impacts to less than significant.

The maximum daily operational phase regional emissions would also be reduced due to the reduction in total daily vehicle trips (a reduction of 259 daily trips) and associated vehicle miles traveled. However, project operational impacts would not exceed SCAQMD's threshold levels. This alternative would slightly reduce the air quality impacts which would be less than significant.

### 7.6.3 Biological Impacts

The No Project/Existing Los Rios Specific Plan Alternative would result in reduced impacts to biological resources as the proposed project (less than significant after mitigation) since the development area and number of trees to be removed would be reduced.

### 7.6.4 Cultural Resources

Implementation of the No Project/Existing Los Rios Specific Plan Alternative would have a reduced development footprint, which would result in a reduced potential to uncover cultural resources during grading activities. Thus, impacts would be less than the proposed project and be reduced to less than significant upon implementation of mitigation measures.

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<sup>1</sup> Based on ITE Trip Generation Manual 10th Edition, Nursery (Garden Center), ITE Code 817.

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### 7.6.5 Geology and Soils

Under this alternative, like the proposed project, existing buildings would be removed and graded and required to comply with the most recent building and seismic codes and regulations. Geology and soils impacts of this alternative would be less than significant, similar to the proposed project.

### 7.6.6 Greenhouse Gas Emissions

The No Project/Existing Los Rios Specific Plan Alternative would result in a reduction in square footage and would decrease daily vehicle trips and vehicle miles traveled compared to the proposed project. Therefore, this alternative would result in a reduction in construction and operational GHG emissions. As with the proposed project, impacts related to GHG emissions would be less than significant.

### 7.6.7 Hazards and Hazardous Materials

Similar to the proposed project, buildout of the No Project/Existing Los Rios Specific Plan Alternative would involve the use of hazardous materials during construction. However, construction materials such as fuels, paints, and solvents would be used in limited quantities and would not pose a significant safety hazard. Use and transport of hazardous materials would be required to comply with the appropriate state standards, guidelines, and responsible agencies.

Long-term operation of the project under this alternative would be similar to the proposed project, and involve small amounts of hazardous materials, such as cleansers, paints, fertilizers, and pesticides for cleaning and maintenance purposes. Although a garden center would involve the use and sale of pesticides and fertilizers, it would not generate, store, or transport large quantities of hazardous materials; such uses generally include manufacturing, industrial, medical (e.g., hospital), and other similar uses. Therefore, impacts would be similar and less than significant.

### 7.6.8 Hydrology and Water Quality

The project site is developed with nursery uses and runoff is conveyed by surface streets or local storm drains to regional storm drainage facilities. Like the proposed project, the No Project/Existing Los Rios Specific Plan Alternative would be required to reduce peak flow rates by implementing low-impact development features and providing a treatment/infiltration system that reduces runoff volumes conveyed to the drainage system. Therefore, it is anticipated that this alternative and the proposed project would have a beneficial impact on area hydrology and water quality at completion. Similar to the proposed project, implementation of this alternative would result in compliance with the National Pollutant Discharge Elimination System Construction General Permit requirements and implementation of various BMPs to reduce water quality impacts. Therefore, hydrology and water quality impacts of this alternative would be similar to the proposed project and would not be significant.

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### 7.6.9 Land Use and Planning

The No Project/Existing Los Rios Specific Plan Alternative would develop a garden center, which is current use allowed by the adopted Specific Plan. Similar to the project, this alternative would be consistent with the goals and policies of the cities' general plan and the Southern California Association of Governments' (SCAG's) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). However, this alternative would not require amendments to the general plan and zoning code. Overall, impacts would be similar and result in less than significant impacts.

### 7.6.10 Noise

Since this alternative would have a reduced building development footprint, construction-related noise impacts would be reduced. However, peak construction noise volumes and distance to sensitive receptors would be the similar to the proposed project, this alternative would result in temporary significant and unavoidable noise impacts.

The reduction in vehicle trips would slightly reduce the operational traffic-related noise impacts. However, no significant operational-related noise impacts were identified for the proposed project. Noise impacts of this alternative would be reduced compared to the proposed project and less than significant.

### 7.6.11 Public Services

Like the proposed project, this alternative would comply with the California Fire Code, and implementation of existing regulations and standard conditions would ensure that impacts related to fire service are not substantially different from that of the proposed project. As part of the proposed project, public service providers were contacted to determine whether development would adversely impact existing and future planned levels of service and resources; fire and police protection service providers determined the project would not result in any adverse impacts to their services and resources. As with the proposed project, public service impacts would be similar and less than significant.

### 7.6.12 Transportation and Traffic

Short-term traffic impacts would be slightly reduced compared to the proposed project, because the reduced development intensity would reduce the number of construction-related trips and length of construction activities. Similar to the proposed project, this alternative would require implementation of a construction traffic management plan to reduce construction traffic impacts to less than significant.

Although this alternative would result in a reduction of 259 daily trips compared to the proposed project, the garden center use would result in an increase of 74 PM peak hour trips. Therefore, this alternative would result in an increase in traffic impacts during the PM peak hour and would exacerbate the queuing impact at Paseo Adelanto and Del Obispo under General Plan Buildout conditions. Operational traffic impacts would be greater under this alternative compared to the proposed project.

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### 7.6.13 Tribal Cultural Resources

Similar to the proposed project, this alternative would result in ground disturbances due to grading. The potential to encounter buried tribal cultural resources would be slightly reduced under this alternative due to the reduced development footprint. Impact would remain less than significant after mitigation.

### 7.6.14 Utilities, Service Systems, and Energy

Under this alternative, building square footage would be reduced compared to the proposed project. Therefore, this alternative would generate less wastewater and consume less water. The solid waste generation would also be reduced. Utilities and service systems impacts of this impact would be reduced compared to the proposed project and less than significant after mitigation.

Under this alternative, allowable building square footage would be reduced and the associated energy demand would also be reduced. Construction and operational activities associated with this alternative would have slightly reduced energy demand. Impacts would be similar to the proposed project and remain less than significant.

### 7.6.15 Conclusion

#### Ability to Reduce Environmental Impacts

The No Project/Existing Los Rios Specific Plan Alternative would lessen environmental impacts in the areas of aesthetics, air quality, biological resources, cultural resources, GHG emissions, noise, tribal cultural resources, and utilities and service systems. However, significant and unavoidable construction-related noise impacts would remain.

This alternative would result in an increase in traffic impacts during the PM peak hour and would exacerbate the queuing impact at Paseo Adelanto and Del Obispo under General Plan Buildout conditions. This alternative would have similar impacts in the area of geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, and public services.

Overall, this alternative is not considered environmentally superior when compared to the proposed project because it would not eliminate the temporary significant and unavoidable construction-related noise impact and it would increase the significant queuing at Paseo Adelanto and Del Obispo. Furthermore, although it would reduce impacts for other environmental areas, those impacts were determined to be less than significant or could be significantly reduced through mitigation measures.

#### Ability to Achieve Project Objectives

The No Project/Existing Los Rios Specific Plan Alternative would not meet many of the project objects. For example, the No Project/Existing Los Rios Specific Plan, would not: add a Commercial Core Planning Area to encourage the development of commercial opportunities that honor the rich history of the Los Rios neighborhood and surrounding uses (Objective 1); redevelop the site with a complementary mix of commercial and office uses for residents and visitors (Objectives 2, 3); enhance the visual attributes of the

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project site and the greater Los Rios area through implementation of design guidelines, landscape design, and signage requirements (Objective 9).

This alternate would achieve some of the proposed project's objectives but to a lesser extent as compared to the proposed project. For example, the No Project/Existing Los Rios Specific Plan Alternative would increase the City's revenue-generating tax base through new sales tax (Objective 4), create new jobs (Objective 6), and increase the number of employees within a transit priority area (Objective 7). However, these objectives would be achieved to a lesser extent given the reduced development intensity and lack of diverse retail uses (single tenant use).

### 7.7 REDUCED INTENSITY ALTERNATIVE

The Reduced Intensity Alternative was selected to lessen potentially significant impacts related to air quality, noise, and traffic. However, as described above and within the substantive chapters of this EIR, these potentially significant impacts can already be reduced through the implementation of mitigation measures. Regardless, in order to eliminate a potentially significant PM peak hour traffic impact at Paseo Adelanto and Del Obispo Street during General Plan Buildout conditions, a reduction in queue length by 2 cars would be required; the project's eastbound left-turns would need to be reduced by 18 cars. This equates to an overall project trip generation reduction of 40 cars (from 106 to 66) for the inbound trips during the PM peak hour.

This reduction in trips results in a proportional decrease in building square footage. Using a high-turnover restaurant rate of 9.77 PM peak hour trips (62 percent inbound and 38 percent outbound) per thousand square feet (ITE Code 932: High-Turnover Restaurant), this alternative would reduce high-turnover restaurant building square footage by approximately 6,605, allowing buildout of 58,295 square feet. Implementation of the amendment to the Specific Plan provisions would still apply to this alternative.

#### 7.7.1 Aesthetics

Aesthetic impacts associated with the Reduced Intensity Alternative would be similar to the proposed project because it would result in a similar development area and would require compliance with the provisions of the proposed amendment to the Los Rios Specific Plan. Although buildout intensity would be reduced, heights, setbacks, building forms, and other development standards and design guidelines would still apply. Therefore, impacts would be less than significant and similar to the proposed project.

#### 7.7.2 Air Quality

The Reduced Intensity Alternative would reduce regional air quality impacts by approximately 10 percent, with an approximate 6,605 square feet reduction of building area. However, it was determined that mitigation would reduce construction-related impacts to less than significant.

The maximum daily operational phase regional emissions would also be reduced due to the reduction in total daily vehicle trips and associated vehicle miles traveled. However, project operational impacts would not exceed SCAQMD's threshold levels. This alternative would slightly reduce the air quality impacts which would be less than significant.

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### 7.7.3 Biological Impacts

The Reduced Intensity Alternative would result in similar impacts to biological resources as the proposed project (less than significant after mitigation) since the development area and number of trees to be removed would be the same.

### 7.7.4 Cultural Resources

Similar to the proposed project, implementation of the Reduced Intensity Alternative would cover the same development area and could uncover cultural resources during grading activities. Thus, impacts would be the same as the proposed project and be reduced to less than significant upon implementation of mitigation measures.

### 7.7.5 Geology and Soils

Under this alternative, like the proposed project, existing buildings would be removed and graded and required to comply with the most recent building and seismic codes and regulations. Geology and soils impacts of this alternative would be less than significant, similar to the proposed project.

### 7.7.6 Greenhouse Gas Emissions

The Reduced Intensity Alternative would result in a reduction in restaurant square footage and would decrease vehicle trips compared to the proposed project. Therefore, this alternative would result in a reduction in construction and operational GHG emissions. As with the proposed project, impacts related to GHG emissions would be less than significant.

### 7.7.7 Hazards and Hazardous Materials

Similar to the proposed project, buildout of the Reduced Intensity Alternative would involve the use of hazardous materials during construction. However, construction materials such as fuels, paints, and solvents would be used in limited quantities and would not pose a significant safety hazard. Use and transport of hazardous materials would be required to comply with the appropriate state standards, guidelines, and responsible agencies.

Long-term operation of the project under this alternative would be similar to the proposed project, and involve small amounts of hazardous materials, such as cleansers, paints, fertilizers, and pesticides for cleaning and maintenance purposes. However, the proposed land uses are not associated with uses that use, generate, store, or transport large quantities of hazardous materials; such uses generally include manufacturing, industrial, medical (e.g., hospital), and other similar uses. Therefore, impacts would be similar and less than significant.

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### 7.7.8 Hydrology and Water Quality

The project site is developed with nursery uses and runoff is conveyed by surface streets or local storm drains to regional storm drainage facilities. Like the proposed project, this alternative is anticipated to reduce peak flow rates by implementing low-impact development features and providing a treatment/infiltration system that reduces runoff volumes conveyed to the drainage system. Therefore, it is anticipated that this alternative and the proposed project would have a beneficial impact on area hydrology and water quality at completion. Similar to the proposed project, implementation of this alternative would result in compliance with the National Pollutant Discharge Elimination System Construction General Permit requirements and implementation of various BMPs to reduce water quality impacts. Therefore, hydrology and water quality impacts of this alternative would be similar to the proposed project and would not be significant.

### 7.7.9 Land Use and Planning

The Reduced Intensity Alternative would allow for a similar mix of commercial and office uses with less development intensity than the proposed project. This alternative would also require amendments to the general plan and zoning code. Similar to the proposed project, this alternative would be consistent with the goals and policies of the cities' general plan and the Southern California Association of Governments' (SCAG's) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and result in less than significant impacts as the proposed project.

### 7.7.10 Noise

Reduction in building development intensity would incrementally reduce the length of project-related construction noise impacts, but not peak construction noise volumes. Due to the peak construction noise volumes and distance to sensitive activities this alternative would be slightly less than the proposed project, but remain significant and unavoidable.

The reduction in vehicle trips would slightly reduce the operational traffic-related noise impacts. However, no significant operational-related noise impacts were identified for the proposed project. Noise impacts of this alternative would be reduced compared to the proposed project and less than significant.

### 7.7.11 Public Services

Like the proposed project, this alternative would comply with the California Fire Code, and implementation of existing regulations and standard conditions would ensure that impacts related to fire service are not substantially different from that of the proposed project. As part of the proposed project, public service providers were contacted to determine whether development would adversely impact existing and future planned levels of service and resources. Fire and police protection service providers determined the project would not result in any adverse impacts to their services and resources. As with the proposed project, public service impacts would be similar and less than significant.



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### 7.7.12 Transportation and Traffic

Short-term traffic impacts would be similar to the proposed project under this alternative because of the similar number of construction-related trips and length of construction activities. Similar to the proposed project, this alternative would reduce implementation of a construction traffic management plan as required by Mitigation Measure TR-1.

This alternative was selected to reduce PM peak hour vehicle trips, which would eliminate the queuing impact at Paseo Adelanto and Del Obispo under General Plan Buildout conditions. This alternative would eliminate the need for Mitigation Measure TR-2. Therefore, operational traffic impacts would be less under this alternative compared to the proposed project.

### 7.7.13 Tribal Cultural Resources

Similar to the proposed project, this alternative would result in ground disturbances due to grading. Therefore, potential tribal cultural resources impacts would be similar to the proposed project, that is, less than significant after mitigation.

### 7.7.14 Utilities, Service Systems, and Energy

Under this alternative, building square footage would be reduced by 10 percent compared to the proposed project. Therefore, this alternative would generate less wastewater and consume less water. The solid waste generation would also be reduced. Utilities and service systems impacts of this impact would be reduced compared to the proposed project and less than significant after mitigation.

Under this alternative, allowable building square footage would be reduced and the associated energy demand would also be reduced. Construction and operational activities associated with this alternative would have slightly reduced energy demand. Impacts would be similar to the proposed project and remain less than significant.

### 7.7.15 Conclusion

#### Ability to Reduce Environmental Impacts

The Reduced Intensity Alternative would lessen environmental impacts in the areas of air quality, GHG emissions, noise, transportation and traffic, and utilities and service systems. This alternative would eliminate the need for one traffic Mitigation Measure TR-2. However, in accordance with CEQA, significant environmental effects may be avoided or substantially lessened through implementation of feasible alternatives or feasible mitigation measures. Mitigation Measure TR-2 is a feasible mitigation measure that would reduce project traffic impacts to less than significant.

This alternative would have similar impacts in the area of aesthetics, biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, public services, and tribal cultural resources. However, significant and unavoidable construction-related noise

## 7. Alternatives to the Proposed Project

impacts would remain. Overall, this alternative is considered environmentally superior when compared to the proposed project.

### Ability to Achieve Project Objectives

Under the Reduced Intensity Alternative, most of the proposed project's objectives would be achieved but to a lesser extent as compared to the proposed project. For example, the Reduced Intensity Alternative would encourage development of commercial opportunities in the Los Rios neighborhood (Objective 1), redevelop the site with a complementary mix of commercial and office uses for residents and visitors compatible with surrounding land uses (Objectives 2, 3). However, these objectives would be achieved to a lesser extent given the 10 percent reduction in development intensity. Additionally, this alternative would not increase the City's revenue-generating tax base through new sales tax (Objective 4), provide business activity in the specific plan area through creation of facilities responsive to community needs (Objective 5), or create new jobs (Objective 6) to the same extent as the proposed project.

## 7.8 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires a lead agency to identify the "environmentally superior alternative" and, in cases where the "No Project" Alternative is environmentally superior to the proposed project, the environmentally superior development alternative must be identified. One alternative has been identified as "environmentally superior" to the proposed project:

- Reduced Intensity Alternative

The Reduced Intensity Alternative has been identified as the environmentally superior alternative. As shown on Table 7-1, this alternative would lessen environmental impacts in the areas of air quality, GHG emissions, noise, transportation and traffic, and utilities and service systems. This alternative would eliminate the need for Mitigation Measure TR-2. However, in accordance with CEQA, significant environmental effects may be avoided or substantially lessened through implementation of feasible alternatives or feasible mitigation measures. Mitigation Measure TR-2 is a feasible mitigation measure that would reduce project traffic impacts to less than significant.

This alternative would have similar impacts in the area of aesthetics, biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, public services, and tribal cultural resources. However, significant and unavoidable construction-related noise impacts would remain.

Due to the 10 percent reduction in development intensity, this alternative would reduce the extent to which project objectives are attained. Furthermore, this alternative would not increase the City's revenue-generating tax base through new sales tax (Objective 4), provide business activity in the specific plan area through creation of facilities responsive to community needs (Objective 5), or create new jobs (Objective 6) to the same extent as the proposed project.

## 7. Alternatives to the Proposed Project

**Table 7-1 Summary of Impacts of Alternatives Compared to the Proposed Project**

Topic	Proposed Project	No Project/No Build Alternative	No Project/ Existing Los Rios Specific Plan Alternative	Reduced Intensity Alternative
Aesthetics	LTS	Greater than project LTS	Less than project LTS	Similar to the project LTS
Air Quality	LTS/M	Less than project LTS	Less than project LTS	Less than project LTS/M
Biological Resources	LTS/M	Less than project LTS	Less than project LTS	Similar to the project LTS/M
Cultural Resources	LTS/M	Less than project LTS	Less than project LTS	Similar to the project LTS/M
Geology and Soils	LTS	Less than project LTS	Similar to the project LTS	Similar to the project LTS
Greenhouse Gas Emissions	LTS	Less than project LTS	Less than project LTS	Less than project LTS
Hazards and Hazardous Materials	LTS	Similar to project LTS	Similar to project LTS	Similar to the project LTS
Hydrology and Water Quality	LTS	Greater than project LTS	Similar to project LTS	Similar to the project LTS
Land Use and Planning	LTS	Similar to project LTS	Similar to project LTS	Similar to the project LTS
Noise	<b>SU</b>	Less than project* LTS	Less than project <b>SU</b>	Less than project <b>SU</b>
Public Services	LTS	Less than project LTS	Similar to the project LTS	Similar to the project LTS
Transportation and Traffic	LTS/M	Less than project LTS	Greater than project LTS/M	Less than project** LTS/M
Tribal Cultural Resources	LTS/M	Less than project LTS	Less than project LTS/M	Similar to the project LTS/M
Utilities, Service Systems, and Energy	LTS/M	Less than project LTS	Less than project LTS/M	Less than project LTS/M

Notes: LTS: Less than Significant; LTS/M: Less than Significant with Mitigation Incorporated; SU: Significant and Unavoidable

\* Indicates elimination of a significant and unavoidable impact.

\*\* Indicates elimination of a significant impact and associated Mitigation Measure TR-2.

## 7. Alternatives to the Proposed Project

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