7.0 ALTERNATIVES TO THE PROPOSED PROJECT

Under CEQA, the identification and analysis of alternatives to a project is a fundamental part of the environmental review process. CEQA Public Resources Code Section 21002.l(a) establishes the need to address alternatives in an Environmental Impact Report (EIR) by stating that in addition to determining a project's significant environmental impacts and indicating potential means of mitigating or avoiding those impacts, "the purpose of an environmental impact report is ... to identify alternatives to the project."

Direction regarding the definition of project alternatives is provided in the *CEQA Guidelines* as follows:

> *An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.*[1]

The *CEQA Guidelines* emphasize that the selection of project alternatives be based primarily on the ability to reduce significant effects relative to the proposed project, "even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly."[2] The *CEQA Guidelines* further direct that the range of alternatives be guided by a "rule of reason," such that only those alternatives necessary to permit a reasoned choice are addressed.[3]

In selecting project alternatives for analysis, potential alternatives must pass a test of feasibility. *CEQA Guidelines* Section 15126.6(f)(1) states that:

> *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 (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site ...*

Beyond these factors, *CEQA Guidelines* require the analysis of a "no project" alternative and an evaluation of alternative location(s) for the project, if feasible. Based on the alternatives analysis, an environmentally superior alternative is to be designated. If the environmentally superior alternative is the "No Project" Alternative, then the EIR shall identify an environmentally superior alternative among the other alternatives.[4] In addition, *CEQA Guidelines* Section 15126.6(c) requires that an EIR identify any alternatives that were considered for analysis but rejected as infeasible and discuss the reasons for their rejection.

The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making. The range of potential alternatives to the proposed project shall also include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. Among the

1 *CEQA Guidelines Section 15126.6(a).*
2 *CEQA Guidelines Section 15126.6(b).*
3 *CEQA Guidelines Section 15126.6(f).*
4 *CEQA Guidelines Section 15126.6(e)(2).*

factors that may be considered 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). Only locations that would avoid or substantially lessen any of the project's significant effects need be considered for inclusion. An alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative need not be considered.

Potential environmental impacts associated with the following alternatives are compared to the project's impacts:

- Alternative 1 – "No Project" Alternative;
- Alternative 2 – "Reduced Density" Alternative; and
- Alternative 3 – "Increased Density" Alternative.

These alternatives were selected based on their potential to implement certain components of the project to accomplish some or most of the basic objectives of the project and avoid or substantially lessen one or more of the proposed project's significant effects. Specifically, the "No Project" Alternative is considered to enable the decision-makers to compare the impacts of approving the project with the impacts of not approving the project. The "Reduced Density" Alternative was selected for analysis to evaluate an alternative that provides fewer dwelling units and whether it would reduce any potentially significant impacts associated with the proposed project. The "Increased Density" Alternative was selected for analysis to evaluate an alternative that prioritizes transit ridership and reduced vehicle miles traveled (VMT) by increasing the amount of residential units on-site and whether it would reduce any of the project's potentially significant impacts.

Throughout the following analysis, the alternatives' impacts are analyzed for each environmental issue area, as examined in Section 5.1, *Land Use and Relevant Planning*, through Section 5.15, *Utilities and Service Systems*, of this EIR. In this manner, each alternative can be compared to the project on an issue-by-issue basis. A table is included at the end of this section that provides an overview of the alternatives analyzed and a comparison of each alternative's impact in relation to the project. This section also identifies alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process. Among the factors used to eliminate alternatives from detailed consideration include failure to meet most of the basic project objectives, infeasibility, or inability to avoid significant environmental impacts. Section 7.7, *"Environmentally Superior" Alternative*, identifies the "environmentally superior" alternative, as required by the *CEQA Guidelines*.

7.1 SUMMARY OF PROJECT OBJECTIVES

An EIR must only discuss in detail an alternative that is capable of feasibly attaining most of the basic objectives associated with the action, while at the same time avoiding or substantially lessening any of the significant effects associated with the proposed project. Below is a summary of the project objectives, as provided in Section 3.6, *Goals and Objectives*.

- Promote economic development of the coastal zone, while enhancing livability and walkability by accommodating a compatible mixture of uses that extends the activity of the downtown core into the planning area.

- Support public transit through transit-oriented development that integrates updated transit facilities and other mobility improvements that would increase ridership and enhance the user experience.
- Improve connectivity and in particular build stronger linkages between downtown and the residential neighborhoods to the south of the site.
- Deliver benefits to the public by increasing the available housing supply, including the provision of affordable units, while providing for amenities that create a destination and enrich the quality of life for on-site occupants and the community-at-large.
- Provide adequate infrastructure and public services to support the proposed development.
- Increase off-site storm drain capacity to serve the project site and immediately downstream area along Cleveland Street (to Wisconsin Avenue) to reduce localized flooding conditions in the public right-of-way.
- Ensure compatibility with surrounding land uses and improve the character of the surrounding community.
- Achieve a high standard of design through application of development standards and design guidelines that support mixed-use development typologies and promote effective placemaking.
- Accommodate phased development of the project with sufficient flexibility in the plan and accompanying development criteria to afford minor modifications in program and design due to a change in conditions.

7.2 SUMMARY OF SIGNIFICANT IMPACTS

Pursuant to *CEQA Guidelines* Section 15126.6(a), an EIR shall describe a range of reasonable alternatives to the project which would feasibly attain most of the basic objectives of the project and would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. Only those impacts found significant and unavoidable are relevant in making the final determination of whether an alternative is environmentally superior or inferior to the proposed project. As detailed in Section 5.1 through Section 5.15 of this EIR, upon compliance with existing regulations and mitigation measures, project implementation would not result in any significant and unavoidable impacts.

7.3 ALTERNATIVES CONSIDERED BUT REJECTED

In accordance with *CEQA Guidelines* Section 15126.6(c), an EIR should identify any alternatives that were considered for analysis but rejected as infeasible and briefly explain the reasons for their rejection. According to the *CEQA Guidelines*, among the factors that may be used to eliminate alternatives from detailed consideration are the alternative's failures to meet most of the basic project objectives, the alternative's infeasibility, or the alternative's inability to avoid significant environmental impacts. The following possible alternatives were considered but not carried forward for additional analysis, since they would not accomplish most of the basic project objectives of the project or are considered infeasible.

"ALTERNATIVE SITE" ALTERNATIVE

CEQA requires a discussion of 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 evaluating whether any of the significant effects of the project would be avoided or substantially lessened by developing 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* Section 15126[5][B][1]). In general, any development or redevelopment of the size and type proposed by the project would have similar impacts related to construction and operational air quality and greenhouse gas (GHG) emissions impacts. Further, project impacts related to energy, population and housing, public services, and utilities and service systems would be similar regardless of where it is developed within Oceanside. Without a site-specific analysis, impacts on aesthetics, biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology/water quality, land use and planning, noise, and transportation cannot be evaluated. The project site is already developed with an existing transit center; redevelopment on the project site would result in fewer impacts than development on an alternate undeveloped vacant property. Furthermore, the site is located in an urbanized and built out area of the City with existing infrastructure (including on-site transit services) for future development to connect.

Additionally, NCTD specifically operates a transit center at this property in Oceanside. NCTD does not own or control other comparably sized properties in the City of Oceanside that are situated along NCTD rail service in order to accommodate the proposed project design. While the project requires approval of several land use entitlements, including a General Plan Amendment, Zone Amendment, Specific Plan, Local Coastal Plan Amendment, Coastal Development Permit, and Vesting Tentative Tract Map, objectives for the project include providing market rate and affordable housing that helps the City address regional housing needs while supporting the NCTD through transit-oriented development that integrates updated transit facilities and other mobility improvements that would increase ridership and enhance the user experience. Several other project objectives are specific to enhancing walkability of the transit center, as well as in the coastal zone with economically beneficial development, providing linkages to downtown, and creating a new destination with an enriched quality of life.

Due to the lack of viable and comparable sites in the general area that would allow for development of the project in a manner that would avoid or substantially lessen the project's potentially significant impacts while achieving the majority of the project objectives, development of the project on an alternative site has been eliminated from consideration.

"NO BUS TRANSFER CENTER RELOCATION" ALTERNATIVE

Based on public comment received as part of the Notice of Preparation (NOP) for the project, the City has considered an alternative that would maintain the existing location of the bus transfer center at the northern end of the site along Cleveland Street. Under existing conditions, the bus transfer center has indirect access to and from the train terminals due to multiple intervening on-site structures, which limit visibility and accessibility between the existing train terminals and bus terminals.

In 2020, NCTD undertook a study to consider options to relocate the existing bus transfer center in order to increase ridership at the transit center (Final Project Study Report[5]). Based on the Final Project Study Report, the distance from the current bus transit station to the new Sprinter/Coaster platforms requires an approximate 6 to 10 minute walk to connect between rail and bus mode. NCTD has found that at this distance and with the current bus and train schedules, patrons walking at a normal or comfortable pace have been missing their train connections because of the long distance and lack of a line-of-sight between modes. Patrons who are mobility impaired and/or traveling with young children may be at an even greater disadvantage for connecting between modes. The Coaster train with its recently relocated train platform further south of the station has compounded this issue. A majority of bus commuters find themselves having to increase their walking speed or engage in running in order to make their train connection. An increased walking speed or running may increase the potential for tripping and increase both physical and emotional stress which decreases rider satisfaction. The primary purpose of the proposed bus transfer center relocation is to shorten the distance between the bus transit station and the Sprinter/Coaster platforms in order to help reduce walking times, so patrons can make their connections without having to increase their normal or comfortable walking speed or engage in running.

The (Final Project Study Report determined that best practices for encouraging ride sharing and increased transit ridership included relocating bus terminals and other transit services within immediate proximity to the train terminals. Not only would relocation of bus transfer center to the proposed location (i.e., at the southern end of the site) better facilitate the transfer between bus and rail service, but this location has been designed to efficiently transfer riders onto the commuter train platforms, improving the connection timing for rail commuters. Further, having bus and rail services adjacent to one another would be more accommodating to transit riders with disabilities and would provide added security (as employees from both services would have eyes on the area simultaneously). As such, this alternative would not meet the project objective to support public transit through transit-oriented development that integrates updated transit facilities and other mobility improvements that would increase ridership and enhance the user experience and has been eliminated from consideration.

"BUS TRANSFER CENTER RELOCATION TO PARKING STRUCTURE" ALTERNATIVE

An alternative that would relocate the bus transfer center to the proposed Block 3 residential parking structure was considered. This relocation would move the bus terminal closer to the train station (compared to the existing condition), but not within immediate proximity. However, operating a bus terminal within an enclosed residential parking structure would create safety design hazards and interfere with parking operations and residential uses. As described above, NCTD's goals and objectives include locating bus terminals and train terminals within immediate proximity to one another. As such, this alternative would increase safety design hazards and would not meet the project objectives to support public transit ridership best practices. As such, the City has eliminated in alternative from consideration.

[5] North County Transit District, *Final Project Study Report Oceanside Transit Center Bus Bay Relocation (311 Seagaze Drive And 302 Missouri Avenue)*, dated September 28, 2020.

"MAINTAIN EXISTING LAND USE DESIGNATION AND ZONING" ALTERNATIVE

An alternative in which the proposed project site's current General Plan land use designations and zoning remain was considered. Based on the City's General Plan, multiple land use designations apply to the property, including Downtown (DT), Coastal Transportation and Utility (C-TU), Coastal Residential High Density (C-RH), and Coastal General Commercial (C-GC); refer to Exhibit 3-3, *Existing and Proposed General Plan Designations*. Based on the City's Zoning Map, the project site is divided into several zones; that portion of the site generally west of Cleveland Street falls within the Downtown District: Public Transportation and Railroad (Subdistrict D-14) and High Density Residential (Subdistrict D-5); refer to Exhibit 3-4, *Existing and Proposed Zoning*. The remainder of the site is zoned Public Utility and Transportation (PUT), Office Professional, Coastal (OP), and Medium Density Residential, Coastal (R-3). Under existing conditions, the project site could be developed with a maximum density of 43 dwelling units per acre (du/ac), or up to 430 dwelling units; the existing land use and zoning would primarily allow for commercial development and transit services, but reduced residential uses limited to smaller portions of the project site, compared to the proposed project.

This alternative would not allow for an increased mix of land uses, particularly housing supply, at the train station. This alternative would not meet the basic project objectives of increasing the available housing supply, including the provision of affordable units, accommodating a compatible mixture of uses that extends the activity of the downtown core into the planning area, or supporting public transit through transit-oriented development. As such, this alternative has been eliminated from consideration.

"OPEN SPACE / NO RESIDENTIAL USE" ALTERNATIVE

Based on public comment received during the NOP public review period, the City considered an alternative in which redevelopment focused on a grander transit plaza with more open space and bicycle connectivity (i.e., paths, lanes, and trails), in leu of on-site residential uses. Under this alternative, the project site would continue to serve transit use, but would not include residential uses on-site. This alternative does not meet the basic project objectives of increasing the available housing supply, including the provision of affordable units or accommodating a compatible mixture of uses that extends the activity of the downtown core into the planning area. As such, this alternative has been eliminated from consideration.

7.4 "NO PROJECT" ALTERNATIVE

In accordance with the *CEQA Guidelines*, "the no project analysis shall discuss the existing condition, 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."[6] The *CEQA Guidelines* continue to state that "in certain instances, the no project alternative means 'no build' wherein the existing environmental setting is maintained."[7]

[6] *CEQA Guidelines Section 15126.6(e)(2).*
[7] *CEQA Guidelines Section 15126.6(e)(3)(B).*

According to *CEQA Guidelines* Section 15126.6(e), the specific alternative of "no project" shall also be evaluated along with its impact. The purpose of describing and analyzing a no project alternative is to allow decision makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project. The "no project" analysis is required to discuss the existing conditions at the time the Notice of Preparation was published (on January 13, 2023) 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.

The "No Project" Alternative assumes the circumstance under which the proposed project does not proceed, and the project site's current built condition under the existing General Plan land use designations and zoning remain as is. The "No Project" Alternative is a 'no build' alternative wherein the existing environmental setting is maintained. Specifically, the site would continue to operate as the NCTD transit center, consisting of train terminals, bus terminals, NCTD satellite offices, and surface parking lots. The existing structures on-site would remain, and no new development would occur.

Unlike the proposed project, the "No Project" Alternative would not require a General Plan Amendment, Zone Amendment, Specific Plan, Local Coastal Plan Amendment, Coastal Development Permit, or Vesting Tentative Tract Map.

IMPACT COMPARISON TO THE PROPOSED PROJECT

Land Use and Relevant Planning

As stated in Section 3.0, *Project Description*, the proposed project would require a number of discretionary approvals, including a Zone Amendment, General Plan Amendment, and Local Coastal Program Amendment. Under the "No Project" Alternative, no development would occur and the project site would maintain its existing land use designations and zoning and thus, would be consistent with the General Plan, Local Coastal Program, and Municipal Code. However, in comparison to the proposed project, this alternative would not be able to achieve several General Plan policies compared to the proposed project. Specifically, given that no changes would occur to the existing transit station, this alternative would not be able to assure both the present and future social, economic, and physical enhancement of the community (General Plan Land Use Element Policy 1.1C), nor would it encourage land uses that contribute to the proper balance of land uses within the community or provide a significant benefit to the community (General Plan Land Use Element Policies 1.11B). Additionally, given that none of the proposed multimodal improvements, open space and recreational spaces, right-of-way enhancements, and transit rider and commuter amenities would be implemented, this alternative would not achieve several long range goals from the General Plan Circulation Element related to creating a multimodal transportation system that meets current and future demands, provides efficient and safe movement of people and goods, encourages alternative modes of transportation, integrates well with the regional transportation system, preserves community values, incorporates complete streets, and promotes intra- and inter-city travel (General Plan Circulation Element Long Range Policy Direction Goals 1 through 5, Policy 2.4 and 2.5).

In contrast, the proposed project would construct a 547-unit, mixed-use multi-family community (including market rate and affordable units) with a hotel, NCTD Headquarters building and transit improvements, commercial/ retail and food and beverage services, outdoor open space, parking facilities, and associated amenities, in accordance with the proposed Oceanside Transit Center Specific Plan. The Specific Plan would include development standards and design guidelines that support the

mixture of uses and density of residential living that are critical to achieving the vision of a model transit-oriented development that extends the activity of downtown and promotes ongoing revitalization of the coastal area. Additionally, as analyzed in Section 5.1, the proposed project would be consistent with relevant goals, policies, and/or standards from the General Plan, Municipal Code, California Coastal Act, Local Coastal Program, *Coast Highway Vision and Strategic Plan*, *Oceanside Climate Action Plan*, and the *2020-2045 Regional Transportation Plan/Sustainable Communities Strategy of the Sothern California Association of Governments – Connect SoCal* (2020-2045 RTP/SCS). Overall, this alternative would be neither environmentally superior nor inferior to the proposed project in this regard.

Aesthetics/Light and Glare

The "No Project" Alternative would not result in any new development compared to the proposed project. Therefore, existing development would remain and no aesthetic impacts related to new construction or operational activities would occur under this alternative.

In comparison, development under the proposed project would construct a mixed-use transit-oriented community with office, retail, hotel, transit, community facilities, and multi-family residential uses, with a maximum building height of 90 feet. The proposed Specific Plan includes development standards and design guidelines that would facilitate development that ensures visual compatibility with the character of the surrounding area. Specific Plan Chapter 6.3, *Development Standards*, establishes the development standards and regulations for the planned development on-site. Specific Plan Table 6.1, *Building Envelope Standards*, through Table 6.3, *Parking & Loading Standards*, provide development standards related to floor area ratio, residential density, height, setbacks, building encroachment, as well as open space, landscaping, and parking and loading space requirements. Specific Plan Chapter 6.4, *General Design Guidelines*, includes guidelines for site planning, building design, landscape design, signage and lighting, sustainability, street-level activation, and structured parking. Further, the proposed development would not obstruct existing scenic views of the City's coastal areas from public viewpoints, including views of the Pacific Ocean and Oceanside Pier. Thus, while the "No Project" Alternative would not result in any new aesthetic impacts, the proposed development would enhance the aesthetics of the site and complement the surrounding area. This alternative would be neither environmentally superior nor inferior to the proposed project in this regard.

Biological Resources

No development would occur under this alternative and therefore, no impacts would occur to biological resources in the project area. While no sensitive plants or wildlife species, sensitive habitats, or jurisdictional resources have been identified on-site, proposed project construction activities could impact nesting birds and generate fugitive dust that could affect wildlife. Therefore, the "No Project" Alternative would be environmentally superior compared to the proposed project.

Tribal and Cultural Resources

The "No Project" Alternative would not result in any new development compared to the proposed project. Thus, the potential to impact previously undiscovered cultural or tribal cultural resources during construction activities would not occur. As such, this alternative would be environmentally superior to the proposed project in this regard.

Geology and Soils

The "No Project" Alternative would not result in any new development. Thus, this alternative would not introduce structures or people to existing geologic and seismic hazards on-site. However, it is acknowledged that the existing structures on-site would still be subject to such seismic hazards. The "No Project" Alternative would not result in any construction activities that could impact previously undiscovered paleontological resources. As such, this alternative would be environmentally superior to the proposed project.

Hydrology and Water Quality

Compared to the proposed project, the "No Project" Alternative would not result in any new development. Thus, no new construction or operational activities would impact existing hydrologic and water quality conditions in the project area. The increase in residential and nonresidential density under the proposed project would indirectly result in increased water pollutants compared to the "No Project" Alternative. However, the project site has deficient municipal storm drain discharge facilities to receive drainage for the southern two-thirds of the site, and this alternative would not include the proposed project's new storm drain network, underground detention basins, or best management practices (BMPs) related to hydrology and water quality that would reduce stormwater runoff and improve water quality treatment on-site. As detailed in Table 5.6-1b, *Existing and Proposed Hydrology*, the proposed storm drain design results in a slight decrease in stormwater runoff, when compared to the existing condition, during the 25- and 100-year storm events. The project would also implement site design, source control, and low impact development BMPs that would not occur under the "No Project" Alternative. Last, no storm drain improvements along Cleveland Street would be implemented under the "No Project" Alternative. As such, localized flooding conditions along Cleveland Street would remain under the "No Project" Alternative. Overall, this alternative would be neither environmentally superior nor inferior to the proposed project.

Hazards and Hazardous Materials

No new development would occur under the "No Project" Alternative compared to the proposed project. Thus, the potential to expose workers and the public to hazards and hazardous materials, such as soil contamination, asbestos containing materials (ACMs) and lead based paints (LBPs), during demolition and construction activities would not occur. As such, no mitigation would be required to reduce such impacts. In addition, given that no development would occur, the "No Project" Alternative would not result in the increase in handling of hazardous materials, potential for accidental conditions, or an increase in the transport of hazardous materials. As such, this alternative would be environmentally superior to the proposed project.

Transportation

No new development would occur under the "No Project" Alternative compared to the proposed project. Thus, no transportation impacts related to a potential conflict with a program plan, ordinance or policy addressing the circulation system, VMT, hazard due to a geometric design feature or incompatible use, or inadequate emergency access would occur. In comparison, the proposed project and its mixed-use components are consistent with multiple VMT screening criteria, supports alternative modes of transportation, and reduces auto dependency by strengthening pedestrian, transit, and bicycle connectivity. Various mobility hub improvements are proposed to accommodate transit

users, pedestrians, and bicyclists, including enhanced transit waiting areas and passenger loading, pedestrian walkways and crossings, bikeways, bicycle parking and bike share facilities, dedicated transit ways, flexible curb space, and wayfinding signage. Therefore, while the "No Project" Alternative would result in no new transportation impacts, it would not develop a mixed-use transit-oriented community. Overall, this alternative would be environmentally inferior to the proposed project.

Air Quality

Under the "No Project" Alternative, no new development would occur and the project site would maintain its existing General Plan designations and zoning. Thus, no short-term construction or additional long-term operational air quality emissions would be generated. This alternative would be environmentally superior to the proposed project.

Greenhouse Gas Emissions

Given that no new development would occur on-site, no construction or additional operational GHG emissions would be generated and this alternative would be environmentally superior to the proposed project.

Energy

No new development would occur under the "No Project" Alternative compared to the proposed project. Thus, no new impacts would occur from additional energy usage related to electricity and natural gas consumption. The "No Project" Alternative would be environmentally superior to the proposed project.

Noise

As discussed, the "No Project" Alternative would result in no new development within the project area. Thus, no new construction or operational noise or vibration impacts would occur beyond existing noise conditions of the current NCTD transit center. Since the "No Project" Alternative would not result in additional noise impacts, the "No Project" Alternative would be environmentally superior to the proposed project in this regard.

Population and Housing

As discussed, no new development would occur under the "No Project" Alternative. Thus, no new residents or housing would be introduced into the project area and no population increase or housing impacts would occur. In comparison, the proposed project would introduce up to 1,466 additional residents and 547 market rate and affordable housing units. Therefore, the "No Project" Alternative would be environmentally superior to the proposed project.

However, it is acknowledged that the project would focus housing development in a smart growth opportunity area, particularly a transit-oriented site and major commercial corridor, and would "upzone" the site in coordination with the General Plan update. This would provide market and affordable housing in the City to help meet the Statewide housing demand and the City's Regional Housing Needs Assessment (RHNA) allocations as detailed in the *City of Oceanside General Plan 2021-2029 Housing Element*.

Public Services and Recreation

No new development would occur under this alternative compared to the proposed project. Thus, this alternative would not increase demands for public services or recreation compared to existing conditions. However, the "No Project" Alternative would not develop 1.88 acres of open space, improving the City's existing parkland acreage deficiency, or pay development impact and park fees that would enhance facilities such as, but not limited to, parks, public facilities, and schools. As such, the "No Project" Alternative would be environmentally inferior to the proposed project.

Utilities and Service Systems

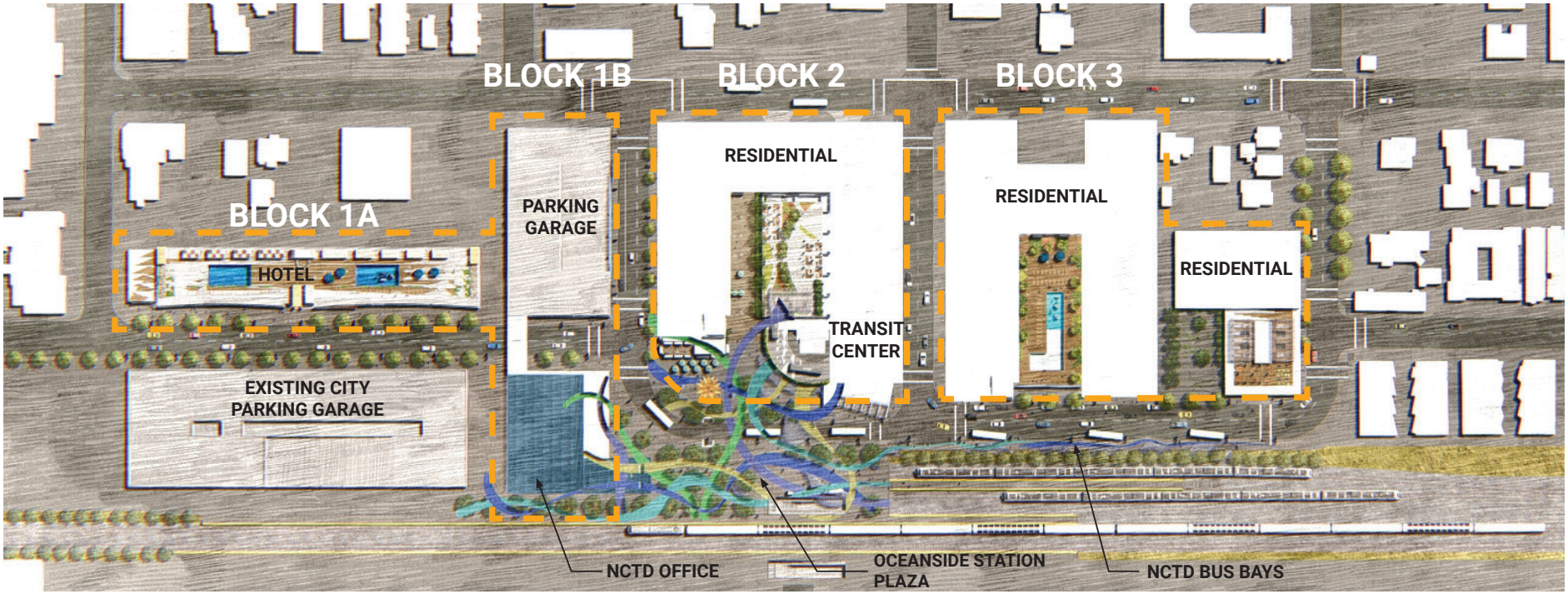
No new development would occur under this alternative compared to the proposed project. Thus, this alternative would not increase water demands, wastewater generation, solid waste generation, and dry utility demands compared to existing conditions. However, the "No Project" Alternative would not construct a new on-site storm drain network, underground detention basins, or stormwater BMPs at the project site. Overall, the "No Project" Alternative would be neither environmentally superior nor inferior to the proposed project.

ABILITY TO MEET PROJECT OBJECTIVES

The "No Project" Alternative would not achieve any of the project's basic objectives. Specifically, given that no new development would occur under this alternative, the "No Project" Alternative would not promote economic development of the coastal zone; support public transit through transit-oriented development that integrates updated transit facilities and other mobility improvements; improve connectivity between downtown and the residential neighborhoods to the south of the site; introducing new housing, including affordable housing, within Oceanside; provide new infrastructure and public services; increase off-site storm drain capacity to reduce flooding; ensure compatibility and improve the character of the surrounding community; achieve a high standard of design through application of development standards and design guidelines that support mixed-use development typologies and promote effective placemaking; or accommodate a phased and flexible development of the project.

7.5 "REDUCED DENSITY" ALTERNATIVE

The "Reduced Density" Alternative aims to develop the project site in a way that prioritizes commercial/retail intensity and provides fewer residential units (including fewer affordable units), less commercial square footage associated with the NCTD office space, and fewer hotel rooms. As shown on Exhibit 7-1, *"Reduced Density" Alternative*, this alternative would result in a similar pattern of land uses as the proposed project. However, on-site residential uses would be constructed in three smaller buildings, instead of the project's two larger buildings. Further, the bus terminals would be situated along the western portion of the project site. Table 7-1, *Proposed Project and "Reduced Density" Alternative Comparison*, provides a general comparison of the proposed project to the "Reduced Density" Alternative. As detailed in Table 7-1, this alternative would develop 27 fewer dwelling units (a total of 520 units) than the proposed project (547 units). Of these, this alternative would only supply 52 affordable units (30 fewer affordable units, compared to the project's 82 affordable units). It should be noted that as fewer dwelling units would be provided, less overall open space area would be provided due to fewer private outdoor spaces. Further, the division of residential buildings on Block 4 would reduce the outdoor roof amenity area.



Source: Toll Brothers Developer Team

Michael Baker INTERNATIONAL

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OCEANSIDE TRANSIT CENTER REDEVELOPMENT
ENVIRONMENTAL IMPACT REPORT

"Reduced Density" Alternative

Exhibit 7-1

Similar to the proposed project, the "Reduced Density" Alternative would require a General Plan Amendment, Zone Amendment, Specific Plan, Local Coastal Plan Amendment, Coastal Development Permit, and Vesting Tentative Tract Map.

Table 7-1
Proposed Project and "Reduced Density" Alternative Comparison

	Proposed Project	"Reduced Density" Alternative
Dwelling Units	547 units	520 units
Affordable Housing	15 percent (82 units)	10 percent (52 units)
Hotel Use	170 rooms	141 rooms
NCTD Headquarters	64,085 gross square feet	50,000 gross square feet
Intermodal Transportation Center	7,427 square feet	4,000 square feet
Commercial/Retail Services	29,196 square feet	30,625 square feet
Parking Spaces	Up to 1,868	Up to 1,800 spaces

IMPACT COMPARISON TO THE PROPOSED PROJECT

Land Use and Relevant Planning

Similar to the proposed project, the "Reduced Density" Alternative would require the same discretionary approvals, including a General Plan Amendment, Zone Amendment, Specific Plan, Local Coastal Plan Amendment, Coastal Development Permit, and Vesting Tentative Tract Map. While the overall density of the proposed development would be reduced under this alternative, land use impacts would be similar to the proposed project. Therefore, this alternative would be neither environmentally superior nor inferior to the proposed project in this regard.

Aesthetics/Light and Glare

This alternative would reduce overall density of the proposed development. Specifically, this alternative would provide 27 fewer dwelling units in three smaller residential buildings (compared to two larger buildings), a hotel with 29 fewer rooms, and a NCTD Headquarters building approximately 14,085 square feet smaller than the proposed project. Development under this alternative would similarly comply with the proposed development standards and design guidelines of the Oceanside Transit Center Specific Plan. Therefore, while development intensity would be reduced, the aesthetic character of the development would remain similar. Additionally, light and glare impacts under this alternative would be similar to the project. Overall, the "Reduced Density" Alternative would be neither environmentally superior nor inferior to the proposed project.

Biological Resources

While this alternative would reduce the development density compared the proposed project, the project footprint disturbance would remain the same. Thus, potential construction-related impacts to biological resources on-site, including nesting and migratory birds, would be the same as the proposed project. As such, similar to the proposed project, potential biological resources impacts as a result of this alternative would be reduced to less than significant levels with implementation of mitigation measures. The "Reduced Density" Alternative would be neither environmentally superior nor inferior to the proposed project.

Tribal and Cultural Resources

This alternative would have the same potential to encounter unknown archaeological resources and tribal cultural resources during ground-disturbing activities as the proposed project. Similar to the proposed project, implementation of mitigation would ensure impacts in this regard are reduced to less than significant levels. Thus, this alternative would be neither environmentally superior nor inferior to the proposed project.

Geology and Soils

As analyzed in Section 5.5, *Geology and Soils*, project compliance with existing regulatory requirements related to geology and seismic hazards would reduce potential hazards in this regard to less than significant levels. Development under this alternative would result in similar less than significant geology and soils impacts regardless of overall proposed density. In addition, given the same development footprint under the proposed project and the "Reduced Density" Alternative, there is a similar potential for unknown paleontological resources to be located within the project area. Implementation of mitigation measures would ensure that impacts related to paleontological resources would be reduced to less than significant levels, similar to the proposed project. Thus, this alternative would be neither environmentally superior nor inferior to the proposed project.

Hydrology and Water Quality

Similar to the proposed project, construction activities under the "Reduced Density" Alternative could result in short-term water quality impacts associated with the handling, storage, and disposal of construction materials, maintenance and operation of construction equipment, and earthmoving activities. This alternative would similarly be subject to the National Pollutant Discharge Elimination System (NPDES) permit requirements and would be required to obtain and Construction General Permit and implement a Stormwater Pollution Prevention Plan (SWPPP).

Given the reduced density, this alternative would proportionally reduce open space areas, including landscaping (i.e., impervious areas) but would also result in proportionally reduced water pollutants. Nevertheless, a Water Quality Management Plan would similarly be required, which would require implementation of a variety of BMPs associated with water quality and stormwater treatment. Additionally, this alternative would similarly construct a new storm drain network, underground detention basins, and BMPs related to hydrology and water quality to reduce stormwater runoff and improve water quality treatment on-site. Last, this alternative would result in similar storm drain improvements, south of the project site, in order to alleviate existing localized flooding conditions. Therefore, hydrology and water quality impacts of this alternative would be similar to the proposed project and result in less than significant impacts. Overall, this alternative would be neither environmentally superior nor inferior to the proposed project.

Hazards and Hazardous Materials

Similar to the proposed project, this alternative would involve demolishing the on-site structures and buildings. Existing structures on the project site appear to have been constructed in the 1980s and thus, demolition could result in the release of asbestos-containing materials (ACMs), lead-based paint (LBP), and polychlorinated biphenyls (PCBs). As such, this alternative could also potentially expose workers and the public to hazards and hazardous materials during demolition and construction

activities. Additionally, this alternative would also develop a subterranean parking garage with potential vapor intrusion. However, impacts would similarly be reduced to less than significant levels with implementation of mitigation. Construction activities under both development scenarios would also temporarily impact surrounding roadways and may require temporary lane closures. However, similar to the project, this alternative would not interfere with emergency access in the site vicinity upon implementation of a Construction Management Plan (Mitigation Measure TRA-1). Overall, this alternative would be neither environmentally superior nor inferior to the proposed project with regards to hazards and hazardous materials.

Transportation

Compared to the proposed project, the "Reduced Density" Alternative would reduce residential and nonresidential development on-site, which would reduce the ability to contribute towards a transit oriented development, compared to that of the proposed project. Nevertheless, impacts would similarly be less than significant with regards to VMT as this alternative would meet several VMT screening criteria, including being located in a transit priority area (TPA) or smart growth opportunity area (SGOA), low-VMT generating area, providing locally serving retail uses, providing locally serving hotels, and being a transit project. This alternative would also include similar right-of-way improvements to adjacent roadways to accommodate the anticipated increase in bus, automobile, bicycle, and pedestrian demands. Similar to the proposed project, all proposed improvements would comply with City and Specific Plan design standards. Construction activities under both scenarios would potentially result in temporary lane closures on adjacent roadways and would require implementation of Mitigation Measure TRA-1 to prepare and implement a Construction Management Plan. Overall, this alternative would be neither environmentally superior nor inferior to the proposed project.

Air Quality

The "Reduced Density" Alternative would introduce 27 fewer dwelling units, a smaller hotel with 29 fewer rooms, and an NCTD headquarters approximately 14,085 square feet smaller in size compared to proposed project. Thus, this alternative would proportionally reduce the project's short-term construction and long-term operational air quality emissions. This alternative would be environmentally superior to the proposed project.

Greenhouse Gas Emissions

Compared to the proposed project, the reduced development intensity proposed under the "Reduced Density" Alternative would proportionally reduce the project's GHG emissions during construction and operational phases. As such, this alternative would be environmentally superior to the proposed project.

Energy

Compared to the proposed project, impacts from energy usage related to electricity and natural gas consumption during construction and operations would proportionally decrease, given the reduced development intensity, compared to the proposed project. Thus, this alternative would be environmentally superior to the proposed project.

Noise

Due to the reduced development intensity of the "Reduced Density" Alternative, construction-related noise impacts would proportionally decrease compared to the proposed project. Additionally, operational noise impacts from fewer stationary and mobile noise sources under this alternative would be reduced compared to the proposed project. This alternative would be environmentally superior to the proposed project.

Population and Housing

The "Reduced Density" Alternative would construct 27 fewer dwelling units. Based on the City's average household size of 2.68, this alternative would introduce approximately 73 fewer residents than the proposed project and, as such, would result in reduced impacts to population growth. Overall, this alternative would be environmentally superior to the proposed project.

However, it is acknowledged that this alternative would provide 30 fewer affordable units (52 affordable units compared to the project's 82 affordable units) and thus, contribute less towards meeting the Statewide housing demand and City's RHNA allocation compared to the proposed project.

Public Services and Recreation

The "Reduced Density" Alternative would provide 27 fewer units and introduce 73 fewer residents compared to the proposed project. Therefore, this alternative would result in a proportional reduction in demand for fire, police, school, library, and parks and recreation services. It is acknowledged that this alternative would provide fewer recreational amenities (e.g., open space, private outdoor spaces, rooftop amenities) than the proposed project. However, overall impacts related to public services and recreation would be reduced under this alternative. This alternative would be environmentally superior to the proposed project.

Utilities and Service Systems

Given the reduction in development intensity, this alternative would generate proportionally less wastewater, water demand, solid waste, and electricity and gas demands. Thus, this alternative would be environmentally superior to the proposed project.

ABILITY TO MEET PROJECT OBJECTIVES

The "Reduced Density" Alternative would achieve all of the project's basic objectives, however, not to the extent as the proposed project for some objectives. Specifically, this alternative would promote economic development and enhance livability and walkability by introducing a compatible mixture of uses in the coastal zone, but to a lesser extent than the proposed project given the reduction in development intensity. Similarly, this alternative would introduce fewer dwelling units than the proposed project and thus, would improve the connectivity and strengthen linkages between downtown and the residential neighborhood to the south to a lesser extent than the proposed project. Additionally, of the 520 units, this alternative would only supply 52 affordable units (30 fewer affordable units, compared to the project's 82 affordable units). Thus, this alternative would meet this project objective but to a lesser extent than the proposed project.

Similar to the proposed project, this alternative would introduce a transit-oriented development and support public transit at the NCTD. Proposed transit improvements under this alternative would update transit facilities and mobility improvements to encourage ridership and enhance user experience. Additionally, the "Reduced Density" Alternative would provide similar infrastructure and public service improvements to support the transit-oriented development, comply with development standards and design guidelines associated with the Oceanside Transit Center Specific Plan, and accommodate phased development of the site with flexibility to allow minor modifications in the program and design. Last, this alternative would increase off-site storm drain capacity to serve the project site and immediately downstream area along Cleveland Street (to Wisconsin Avenue) in order to reduce localized flooding conditions in the public right-of-way.

7.6 "INCREASED DENSITY" ALTERNATIVE

The "Increased Density" Alternative aims to develop the project site in a way that prioritizes transit ridership and reducing VMT by increasing the residential units on-site. This alternative would include one additional floor in each residential building, increasing the residential units an additional 116 units, compared to the proposed project, for a total of 663 dwelling units. Building R1 on Block 3 would include 53 additional residential units, for a total of 303 units, and Building R2 on Block 4 would include 63 additional residential units, for a total of 360 units. This alternative would proportionately increase the rate of affordable units provided; similar to the proposed project, 15 percent of units would be affordable for a total of 100 affordable units (an increase of 18 affordable units compared to the proposed project). Table 7-2, *Proposed Project and "Increased Density" Alternative Comparison*, provides a general comparison of the proposed project to the "Increased Density" Alternative. It should be noted that outdoor roof amenity areas under the proposed project would be elevated to the sixth floor under this alternative and would maintain the same layout and square footages as the proposed project.

Similar to the proposed project, the "Increased Density" Alternative would require a General Plan Amendment, Zone Amendment, Specific Plan, Local Coastal Plan Amendment, Coastal Development Permit, and Vesting Tentative Tract Map.

Table 7-2
Proposed Project and "Increased Density" Alternative Comparison

	Proposed Project	"Increased Density" Alternative
Dwelling Units	547 units	633 units
Affordable Housing	15 percent (82 units)	15 percent (100 units)
Hotel Use	170 rooms	170 rooms
NCTD Headquarters	64,085 gross square feet	64,085 gross square feet
Intermodal Transportation Center	7,324 square feet	7,324 square feet
Commercial/Retail Services	29,196 square feet	29,196 square feet
Parking Spaces	1,868	1,928

IMPACT COMPARISON TO THE PROPOSED PROJECT

Land Use and Relevant Planning

Under the "Increased Density" Alternative, the project would require the same discretionary approvals and adhere to the Oceanside Transit Center Specific Plan development standards and design guidelines. While the overall density of the proposed development would increase under this alternative, land use impacts would be similar to the proposed project. Therefore, this alternative would be neither environmentally superior nor inferior to the proposed project in this regard.

Aesthetics/Light and Glare

To accommodate the increased density on-site, this alternative would include one additional floor in each residential building, increasing the residential units an additional 116 units, compared to the proposed project, for a total of 663 dwelling units. Building R1 on Block 3 would include 53 additional residential units (303 total units) and Building R2 on Block 4 would include 63 additional residential units (360 total units). Additionally, the outdoor roof amenity areas under the proposed project would be elevated to the sixth floor under this alternative and would maintain the same layout and square footages as the proposed project. As such, this alternative would result in slightly higher residential buildings with the remainder of the structures (i.e., NCTD office building, parking garage, and hotel) the same. The Specific Plan would have to be modified to account for increased residential building heights. Given the increase in height and size of the residential buildings, the "Increased Density" Alternative would result in greater aesthetic impacts. Additionally, the additional dwelling units would result in more light sources from additional vehicular trips and stationary light sources. Overall, the "Increased Density" Alternative would be environmentally inferior to the proposed project.

Biological Resources

While this alternative would increase density on-site, the development footprint would remain the same as under the proposed project. Therefore, the potential to impact biological resources on-site during construction activities would be similar and, similar to the proposed project, impacts would be reduced to less than significant levels with implementation of recommended mitigation. This alternative would be neither environmentally superior nor inferior to the proposed project.

Tribal and Cultural Resources

Given the same development footprint, this alternative would have the same potential to encounter unknown archaeological resources and tribal cultural resources during ground-disturbing activities as the proposed project. Similar to the proposed project, implementation of mitigation would ensure impacts in this regard are reduced to less than significant levels. Thus, this alternative would be neither environmentally superior nor inferior to the proposed project.

Geology and Soils

Development under this alternative would result in similar less than significant geology and soils impacts regardless of overall proposed density. In addition, given the same development footprint under the proposed project and the "Increased Density" Alternative, there is a similar potential for unknown paleontological resources to be located within the project area. Implementation of mitigation measures would ensure that impacts related to paleontological resources would be reduced

to less than significant levels, similar to the proposed project. Thus, this alternative would be neither environmentally superior nor inferior to the proposed project.

Hydrology and Water Quality

Construction activities under the "Increased Density" Alternative could result in short-term water quality impacts associated with the handling, storage, and disposal of construction materials, maintenance and operation of construction equipment, and earthmoving activities. This alternative would similarly be subject to the National Pollutant Discharge Elimination System (NPDES) permit requirements and would be required to obtain and Construction General Permit and implement a Stormwater Pollution Prevention Plan (SWPPP).

While the project would result in increased density, this alternative would also proportionally increase open space areas, including landscaping (i.e., impervious areas) to meet open space requirements detailed in the Oceanside Transit Center Specific Plan. A Water Quality Management Plan would also be required, which would require implementation of a variety of BMPs associated with water quality and stormwater treatment to accommodate any additional runoff volumes or pollutants generated by the additional dwelling units. Additionally, this alternative would similarly construct a new storm drain network, underground detention basins, and BMPs related to hydrology and water quality to reduce stormwater runoff and improve water quality treatment on-site. Therefore, hydrology and water quality impacts of this alternative would be similar to the proposed project and result in less than significant impacts. Last, this alternative would result in similar storm drain improvements, south of the project site, in order to alleviate existing localized flooding conditions. Overall, this alternative would be neither environmentally superior nor inferior to the proposed project.

Hazards and Hazardous Materials

This alternative would involve demolishing the on-site structures and buildings, similar to the proposed project, which could result in the release of ACMs, LBP, and PCBs. As such, this alternative could also potentially expose workers and the public to hazards and hazardous materials during demolition and construction activities. Additionally, this alternative would also develop a subterranean parking garage with potential vapor intrusion. However, impacts would similarly be reduced to less than significant levels with implementation of mitigation. Construction activities under both development scenarios, regardless of an increase in density, would also temporarily impact surrounding roadways and may require temporary lane closures. Similar to the project, this alternative would be required to implement a Construction Management Plan (Mitigation Measure TRA-1) to ensure adequate emergency access is provided during the construction duration. Overall, this alternative would be neither environmentally superior nor inferior to the proposed project with regards to hazards and hazardous materials.

Transportation

As stated, the intent of the "Increased Density" Alternative is to prioritize transit ridership and reduce VMT by increasing the residential units on-site. Thus, this alternative would enhance the transit-oriented nature of the development by creating a more residentially dense community within a transit area. It is reasonable to assume the denser development would result in a reduction in VMT. Additionally, this alternative would continue to meet the same VMT screening criteria as the proposed project, including being located in a TPA or SGOA, low-VMT generating area, providing locally

serving retail uses, providing locally serving hotels, and being a transit project. Similar right-of-way improvements to adjacent roadways would be implemented under this alternative to accommodate the anticipated increase in bus, automobile, bicycle, and pedestrian demands, which would all comply with applicable City and Specific Plan design standards. Further, construction activities, under both this alternative and the proposed project, would potentially result in temporary lane closures on adjacent roadways and would require implementation of Mitigation Measure TRA-1 to prepare and implement a Construction Management Plan. Overall, this alternative would be environmentally superior to the proposed project given the reduction in VMT.

Air Quality

The "Increased Density" Alternative would introduce an additional 116 units, compared to the proposed project, for a total of 663 dwelling units. Thus, this alternative would proportionally increase the project's short-term construction and long-term operational air quality emissions. However, the reduced VMT associated with this alternative would also proportionally reduce mobile source air emissions. Thus, this alternative would be neither environmentally superior nor inferior to the proposed project.

Greenhouse Gas Emissions

Compared to the proposed project, the increased development intensity proposed under this alternative would proportionally increase the project's GHG emissions during construction and operational phases. However, the reduced VMT associated with this alternative would also proportionally reduce mobile GHG emissions. As such, this alternative would be neither environmentally superior nor inferior to the proposed project.

Energy

Compared to the proposed project, impacts from energy usage related to electricity and natural gas consumption during construction and operations would proportionally increase given that the development intensity under the "Increased Density" Alternative would be proportionally increased, compared to the proposed project. Thus, this alternative would be environmentally inferior to the proposed project.

Noise

Due to the increased development intensity of this alternative, construction-related noise impacts would proportionally increase compared to the proposed project. Additionally, operational noise impacts from more stationary and mobile noise sources under this alternative would be increased compared to the proposed project. This alternative would be environmentally inferior to the proposed project.

Population and Housing

The "Increased Density" Alternative would construct an additional 116 units compared to the proposed project. Based on the City's average household size of 2.68, this alternative could introduce up to 311 additional residents. Therefore, this alternative would increase impacts to population and housing growth but would still be within SANDAG's population and dwelling unit forecasts for 2050

for Oceanside and San Diego County. Overall, this alternative would be environmentally inferior to the proposed project.

However, it is acknowledged that this alternative would construct more housing units, including affordable units and thus, contribute more towards meeting the Statewide housing demand and City's RHNA allocation compared to the proposed project.

Public Services and Recreation

The "Increased Density" Alternative would provide 116 additional units and introduce 311 additional residents compared to the proposed project. Therefore, this alternative would result in a proportional increase in demand for fire, police, school, library, and parks and recreation services. It is acknowledged that this alternative would provide more recreational amenities than the proposed project to accommodate the added residents and dwelling units. Overall impacts related to public services and recreation would be increased under this alternative. This alternative would be environmentally inferior to the proposed project.

Utilities and Service Systems

Given the increase in density, this alternative would demand proportionally more water, electricity, and natural gas services, and generate more wastewater and solid waste. This alternative would be environmentally inferior to the proposed project.

ABILITY TO MEET PROJECT OBJECTIVES

The "Increased Density" Alternative would achieve all of the project's basic objectives. This alternative would promote economic development and enhance the livability and walkability of the project area with the increase in residential density. Transit facility and mobility improvements would be similar to the proposed project under the "Increased Density" Alternative with the goal to increase ridership and enhance user experience. Additionally, the increase in residential development on-site would improve connectivity and strengthen linkages between the downtown and residential neighborhoods to the south, and proportionately increase the number of affordable units provided. Similar to the proposed project, residential amenities, including open space and recreational amenities would be provided. Further, this alternative would either provide or pay development impact fees to ensure adequate infrastructure and public services are available to support the proposed development. This alternative would also introduce the same land uses as the proposed project and develop residential and nonresidential uses on-site based on the Oceanside Transit Center Specific Plan development standards and design guidelines. This alternative would accommodate phased development with flexibility in the plan to allow for minor modifications in program and design. Last, similar to the project, this alternative would increase off-site storm drain capacity to serve the project site and immediately downstream area along Cleveland Street (to Wisconsin Avenue) in order to reduce localized flooding conditions in the public right-of-way.

7.7 "ENVIRONMENTALLY SUPERIOR" ALTERNATIVE

Table 7-3, *Comparison of Alternatives*, summarizes the comparative analysis presented above (i.e., the alternatives compared to the proposed project). Review of Table 7-3 indicates the "No Project" Alternative is the environmentally superior alternative, as it would avoid or lessen most of the project's environmental impacts. According to *CEQA Guidelines* Section 15126.6(e), "if the environmentally superior alternative is the "no project" alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives." Accordingly, the "Reduced Density" Alternative is considered the environmentally superior alternative to the proposed project.

Table 7-3
Comparison of Alternatives

Sections	"No Project" Alternative	"Reduced Density" Alternative	"Increased Density" Alternative
Land Use and Relevant Planning	=	=	=
Aesthetics/Light and Glare	=	=	▲
Biological Resources	▼	=	=
Tribal and Cultural Resources	▼	=	=
Geology and Soils	▼	=	=
Hydrology and Water Quality	=	=	=
Hazards and Hazardous Materials	▼	=	=
Transportation	▲	=	▼
Air Quality	▼	▼	=
Greenhouse Gas Emissions	▼	▼	=
Energy	▼	▼	▲
Noise	▼	▼	▲
Population and Housing	▼	▼	▲
Public Services and Recreation	=	▼	▲
Utilities and Service Systems	▼	▼	▲

▲ Indicates an impact that is greater than the proposed project (environmentally inferior).
▼ Indicates an impact that is less than the proposed project (environmentally superior).
= Indicates an impact that is equal to the proposed project (neither environmentally superior nor inferior).

It is acknowledged that the "No Project" Alternative would not meet any of the project's basic objectives. This alternative would not promote economic development in the coastal zone; support public transit through transit-oriented development; improve connectivity and linkages between downtown and residential neighborhoods; increase available housing supply; provide new infrastructure and public services; increase off-site storm drain capacity to reduce flooding; provide compatible and improved community character; establish development standards and design guidelines that support mixed-use development; or accommodate phased development of the site.

The "Reduced Density" Alternative is considered environmentally superior to the proposed project. The "Reduced Density" Alternative would result in reduced environmental impacts regarding air quality; greenhouse gas emissions; energy; noise; population and housing; public services and recreation; and utilities and service systems; refer to Table 7-3. The remaining environmental topical areas, including land use and relevant planning, aesthetics/light and glare, biological resources, tribal and cultural resources, geology and soils, hydrology and water quality, hazards and hazardous

materials; and transportation, would have similar impacts as the proposed project. This alternative would achieve all of the project's basic objectives, however, not to the extent as the proposed project for some objectives. Specifically, this alternative would promote economic development and enhance livability and walkability by introducing a compatible mixture of uses in the coastal zone, but to a lesser extent than the proposed project given the reduction in development intensity. Additionally, given the reduction in dwelling units, this alternative would improve the connectivity and strengthen linkages between downtown and the residential neighborhood to the south to a lesser extent than the proposed project. Further, since this alternative would only supply 52 affordable units (30 fewer affordable units compared to the project's 82 affordable units, it would meet the project objective of increasing the City's housing supply (and affordable housing supply) to a lesser extent than the proposed project. Last, similar to the proposed project, this alternative would increase off-site storm drain capacity to serve the project site and immediately downstream area along Cleveland Street (to Wisconsin Avenue) in order to reduce localized flooding conditions in the public right-of-way.

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