

7. Alternatives to the Proposed Project

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]).
- “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])

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- “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.

1. Provide for comprehensive planning of the Project Site through preparation of a specific plan to allow for development of a variety of housing types with necessary infrastructure, consistent with the City’s adopted Housing Element.
2. Provide for the transition of the vacant industrial property to residential uses consistent with the existing residential neighborhoods to the north, east, and west.
3. Create a cohesive but diverse neighborhood through high-quality architectural and landscape design.
4. Incorporate sustainable approaches to development and design, including water quality and landscape design techniques.
5. Redevelop a blighted industrial site that has been the site of homeless encampments, illegal fires, and various illegal activities.

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

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

7.2.1 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]).

The Project Applicant does not own any other site of equal size within the City of San Juan Capistrano that could serve as an alternative site for the Proposed Project. Therefore, an alternative site was rejected from further consideration.

7.3 ALTERNATIVES SELECTED FOR FURTHER ANALYSIS

Based on the criteria listed above, the following four 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 Development Alternative
- No Project/Existing Use Alternative
- Neighborhood Retail Alternative
- Reduced Density Single-Family Only Alternative
- Reduced Density Alternative

Table 7-1 describes each alternative and the basis for selecting each alternative. A complete discussion of each alternative is provided below.

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Table 7-1 Alternative Summaries

Alternative	Description	Basis for Selection
No Project/No Development Alternative	<ul style="list-style-type: none"> Project Site and the industrial building onsite would remain vacant 	<ul style="list-style-type: none"> Required by CEQA Avoids need for a General Plan Amendment, Zone Change, and Tentative Tract Map
No Project/ Existing Use Alternative	<ul style="list-style-type: none"> Industrial building would be rehabilitated for another tenant 	<ul style="list-style-type: none"> Required by CEQA Avoids need for a General Plan Amendment, Zone Change, and Tentative Tract Map
Neighborhood Retail Alternative	<ul style="list-style-type: none"> Under this alternative, the Project Site would be developed with 254,433 square feet of neighborhood retail. The Project Site would be rezoned to Neighborhood Commercial with a corresponding General Plan Amendment to change the land use designation onsite to Neighborhood Commercial. 	<ul style="list-style-type: none"> May lessen some impacts Eliminates significant and unavoidable GHG emissions impact Eliminates significant and unavoidable transportation impact Reduces significant and unavoidable construction noise impact
Reduced Density Single-Family Only Alternative	<ul style="list-style-type: none"> This Alternative would develop the Project Site with 150 single-family homes with no multi-family residential units. This would result in an average density of 9.6 dwelling units per acre. The Project Site would still be rezoned to Specific Plan with a corresponding General Plan Amendment to change the land use designation onsite to Specific Plan / Precise Plan. This Alternative would allow additional guest parking spaces to meet the 0.8 guest parking requirement per the SJCMC Section 9-3.535. 	<ul style="list-style-type: none"> May lessen some impacts Reduces significant and unavoidable construction noise impact Reduces building area Reduces average daily trip Provides 0.8 guest parking per dwelling unit per SJCMC standard
Reduced Density Alternative	<ul style="list-style-type: none"> This Alternative would develop the Project Site with 106 single-family homes and 68 townhomes for a total of 174 units. This would result in an average density of 11.18 dwelling units per acre compared to the Proposed Project's average density of 12.1 units/acre. The Project Site would still be rezoned to Specific Plan with a corresponding General Plan Amendment to change the land use designation onsite to Specific Plan / Precise Plan. All other requested discretionary approvals will still be required. This Alternative would allow additional guest parking spaces to meet the 0.8 guest parking requirement per the SJCMC Section 9-3.535. 	<ul style="list-style-type: none"> May lessen some impacts Reduces significant and unavoidable construction noise impact Reduces building area Reduces average daily trip Provides 0.8 guest parking per dwelling unit per SJCMC standard

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An EIR must identify an “environmentally superior” alternative and where the No Project Alternative is identified as environmentally superior, the EIR is then required to identify as environmentally superior an alternative from among the others evaluated. Each alternative’s environmental impacts are compared to the Proposed Project and determined to be environmentally superior, neutral, or inferior. Section 7.9 identifies the Environmentally Superior Alternative.

7.3.1 Alternatives Comparison

The following statistical analysis provides a summary of general socioeconomic buildout projections determined by the four land use alternatives, including the Proposed Project. It is important to note that these are not growth projections. That is, they do not anticipate what is likely to occur by a certain time horizon, but provide a buildout scenario that would only occur if all the areas of the City were to develop to the probable capacities yielded by the land use alternatives. The following statistics were developed as a tool to understand better the difference between the alternatives analyzed in the DEIR. Table 7-2 identifies City-wide information regarding dwelling unit, population and employment projections, and also provides the jobs to housing ratio for each of the alternatives.

Table 7-2 Buildout Statistical Summary

	Proposed Project	No Project/No Development Alternative	No Project/Existing Use Alternative	Neighborhood Retail Alternative	Reduced Density Single-Family Only Alternative	Reduced Density Alternative
Dwelling Units	188	0	0	0	150	174
Population	581 ¹	0	0	0	464 ²	538
Non-Residential Square Footage	0	123,000	123,000	254,433 ³	0	0
Employment	0	0	246 ⁴	433 ⁵	0	0
Jobs-to-Housing Ratio ⁶	1.23	1.25	1.26	1.28	1.23	1.23

Notes:

¹ Based on Chapter 5-11, *Population and Housing*.

² Based on an average of 3.09 residents per unit. Refer to Chapter 5.11, *Population and Housing*.

³ Based on SJC Municipal Code section 9-3.303, floor area ratio for the first floor is 0.25 lot area and floor area ratio for the second floor is 50% of first floor. Therefore, this alternative would have a building footprint of 169,622 square feet.

⁴ Based on an average of 500 square feet per employee for Industrial Park. Source: U.S. Green Building Council 2008.

⁵ Based on an average of 588 square feet per employee for Neighborhood Retail. Source: Ibid.

⁶ Based on Existing + Alternative. Refer to Chapter 5.11, *Population and Housing*.

7.4 NO PROJECT/NO DEVELOPMENT ALTERNATIVE

The No Project Alternative is required to discuss the existing conditions at the time the notice of preparation is published and evaluate what would reasonably be expected to occur in the foreseeable future if the Proposed Project is not approved (CEQA Guidelines, Section 15126.6(e)). This alternative assumes no changes to the current state of the Project Site. The 123,000 square foot industrial building on the Project Site would remain vacant and vegetation onsite would remain overgrown. The roadway realignment for Rancho Viejo Road would not occur. This alternative would preclude the development of the 188 residential units and realignment of

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Rancho Viejo Road. The Project Site is currently zoned Industrial Park (IP) with a General Plan Land Use designation of Industrial Park. This alternative would not require any of the Proposed Project's identified discretionary approvals. Average daily trips under this alternative would be zero since the Project Site is vacant.

7.4.1 Aesthetics

Under this alternative, the Project Site would remain vacant. Compared to the Proposed Project, this alternative would have less of an impact on aesthetics, since the site would remain the unchanged. Aesthetics is not a significant and unavoidable impact of the Proposed Project.

7.4.2 Air Quality

This alternative would not generate construction nor operation-related air pollutants since the site would remain vacant and no new development would occur. This alternative would therefore eliminate the potentially significant impacts generated by the Proposed Project and would not require mitigation measures. Air quality is not a significant and unavoidable impact of the Proposed Project.

7.4.3 Cultural Resources

Under this alternative, the Project Site would remain vacant. No construction activities would occur that may unearth cultural resources. Therefore, this alternative would eliminate the potential of encountering cultural resources compared to the Proposed Project's impacts. Cultural resources is not a significant and unavoidable impact of the Proposed Project.

7.4.4 Energy

No construction activities would occur under this alternative. The Project Site would remain vacant and would not generate a new demand for energy. Therefore, this alternative would not generate a long-term increase in fuel use and energy. Therefore, energy impacts would be reduced under this alternative. Energy is not a significant and unavoidable impact of the Proposed Project.

7.4.5 Geology and Soils

No construction activities would occur under this alternative. Since no new buildings would be constructed, no building considerations regarding expansive soils would occur. And the likelihood of encountering paleontological resources would be eliminated compared to the Proposed Project. This alternative would reduce impacts related to geology and soils. Geology and soils are not a significant and unavoidable impact of the Proposed Project.

7.4.6 Greenhouse Gas Emissions

Under this alternative, no changes would occur to the Project Site. No construction activities would occur and the existing building would remain vacant. This alternative would not generate additional greenhouse gas

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(GHG) emissions from operational activities from existing conditions. Therefore, no impact to GHG emissions would occur under this alternative.

The Proposed Project would conflict with the Southern California Association of Governments' (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), since the Proposed Project's vehicle miles traveled (VMT) per capita is higher than areawide baseline, and would result in a significant and unavoidable impact. This alternative would not increase VMT and would therefore be consistent with SCAG's RTP/SCS. This alternative would reduce the significant and unavoidable impact to a less than significant level.

7.4.7 Hazards and Hazardous Materials

No changes to the existing Project Site would occur. The Project Site would remain vacant. No construction activities would occur and no tenant would occupy the Project Site; therefore, no hazardous materials would be handled on site that would be typical of construction activities or operation of an industrial use. This alternative would reduce impacts to hazards and hazardous materials compared to the Proposed Project. However, hazards and hazardous materials is not a significant and unavoidable impact of the Proposed Project.

7.4.8 Hydrology and Water Quality

Since no construction would occur under this alternative, the existing hydrology and drainage patterns of the Project Site would remain unchanged. The amount of pervious and impervious surfaces would remain the same. This alternative would therefore reduce impacts compared to the Proposed Project. Hydrology and water quality is not a significant and unavoidable impact of the Proposed Project.

7.4.9 Land Use and Planning

No changes to the existing Project Site would occur; therefore, this alternative would be consistent with the existing zoning and land use designation for the Project Site and no discretionary actions are required. This alternative would reduce impacts related to land use and planning compared to the Proposed Project. Land use and planning is not a significant and unavoidable impact of the Proposed Project.

7.4.10 Noise

This alternative would not generate construction noise nor any new operational noise, since the Project Site and building would remain vacant. Therefore, this alternative eliminates any noise impacts compared to the Proposed Project. Noise is a significant and unavoidable impact of the Proposed Project.

7.4.11 Population and Housing

As shown in Table 7-2 above, this alternative does not generate population growth, housing or jobs. This alternative would not contribute to the City's jobs-housing ratio since it does not generate jobs nor housing opportunities. As discussed in Chapter 5.11, Population and Housing, the City does not have an adequate supply of owner-occupied units. This alternative would not develop any owner-occupied units. Therefore, this alternative would not help meet the current demand for owner-occupied units. Since this alternative would not

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achieve some of the beneficial impacts of the Proposed Project related to housing, the impacts of this alternative are considered greater than the Proposed Project but would remain less than significant. Population and housing is not a significant and unavoidable impact of the Proposed Project.

7.4.12 Public Services

No changes would occur to the existing Project Site, and the industrial building would remain vacant. This alternative would not generate any increased demand on public services compared to existing conditions. Therefore, the demand for public services under this alternative would be less than the Proposed Project for fire protection, police protection, schools, and libraries. Public services is not a significant and unavoidable impact of the Proposed Project.

7.4.13 Transportation

This alternative would not implement the roadway realignment to Rancho Viejo Road, and site access would remain the same as existing conditions. This alternative does not generate any vehicle trips and therefore eliminates any traffic-related impacts to roadways, intersections, and roadway segments compared to the Proposed Project.

The Proposed Project results in a significant and unavoidable impact relating to VMT. Since this alternative would not generate any new trips, this alternative would eliminate the significant and unavoidable impact generated by the Proposed Project.

7.4.14 Tribal Cultural Resources

Similar to cultural resources, this alternative does not require any construction or earthwork activities. Therefore, this alternative likelihood of encountering tribal cultural resources onsite would be nil and lower than the Proposed Project. Tribal cultural resources is not a significant and unavoidable impact of the Proposed Project.

7.4.15 Utilities and Service Systems

Under this alternative, the Project Site would remain vacant. Therefore, this alternative would not generate an increased demand for water and telecommunication nor increase wastewater, stormwater, and solid waste generation compared to existing conditions. Compared to the Proposed Project, this alternative results in no impact. Utilities and service systems is not a significant and unavoidable impact of the Proposed Project.

7.4.16 Wildfire

The Project Site is not within a very high fire hazard zone nor within a wildland-urban interface area. However, the City's interactive map identifies the Project Site and its surrounding area as a high fire hazard zone. This alternative would not place any employees, residences, or residential units on site. This alternative would provide more opportunities for undeveloped areas, which could be prone to wildfire risks (especially overgrown vegetation), compared to the Proposed Project's development that has more impervious and nonflammable

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surfaces. Therefore, this alternative would have greater impacts related to wildfire. Wildfire is not a significant and unavoidable impact of the Proposed Project.

7.4.17 Conclusion

The No Project/No Development Alternative would lessen the Proposed Project's environmental impacts in all areas, except for population and housing and wildfire where impacts are expected to increase under this alternative. This alternative would avoid the Proposed Project's significant impacts in greenhouse gas emissions and transportation.

The No Project/No Development Alternative would retain the Project Site as a vacant industrial use. Therefore, none of the project objectives would be achieved under this alternative. This alternative would not allow for the development of a variety of housing types consistent with the City's Housing Element (Objective #1); it would not provide for the transition of a vacant industrial parcel to residential uses (Objective #2); it would not create a diverse neighborhood with high-quality architectural and landscape design (Objective #3); it would not incorporate a sustainable approach to development and design (Objective #4); and it would not redevelop a blighted industrial site (Objective #5).

7.5 NO PROJECT/EXISTING USE ALTERNATIVE

This alternative assumes that the 123,000 square foot industrial building (currently vacant) would be rehabilitated and occupied by a new industrial tenant. The roadway realignment for Rancho Viejo Road would not occur. This alternative would preclude the development of the 188 residential units and realignment of Rancho Viejo Road. The Project Site is currently zoned Industrial Park (IP) with a General Plan Land Use designation of Industrial Park. This alternative would not require any of the Proposed Project's identified discretionary approvals. Average daily trips under this alternative would be approximately 415 trips, which would account for 1,191 trips fewer trips compared to the Proposed Project's 1,606 trips.

7.5.1 Aesthetics

Under this alternative, the existing 123,000 square foot building would be rehabilitated and occupied by a new industrial tenant. Since the industrial building onsite currently sits vacant, the rehabilitation and occupation of building would be expected to increase light and glare impacts with new building materials (e.g. new windows and fresh paint) and lighting and increase of vehicles onsite. Compared to the Proposed Project, this alternative would have less of an impact on aesthetics, since the site would largely remain the same and number of persons, and therefore vehicles, onsite would be less than the Proposed Project. Aesthetics is not a significant and unavoidable impact of the Proposed Project.

7.5.2 Air Quality

This alternative would generate minimal construction-related air pollutants since the building onsite would be rehabilitated and no new development would occur. During operation, this alternative would slightly increase building energy use compared to existing conditions, but less than the Proposed Project. This alternative would result in 1,191 fewer daily trips compared to the Proposed Project. Therefore, operation of the 123,000 square

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foot industrial facility would reduce regional and localized air quality impacts compared to the Proposed Project. This alternative would therefore result in a decrease in short-term construction impacts and long-term operational air quality impacts compared to the Proposed Project. Air quality is not a significant and unavoidable impact of the Proposed Project.

7.5.3 Cultural Resources

Under this alternative, the existing building on site would remain and no new buildings would be added. Therefore, the likelihood of encountering cultural resources would be lower than the Proposed Project's impacts. Cultural resources is not a significant and unavoidable impact of the Proposed Project.

7.5.4 Energy

This alternative would not involve the demolition of the building on site nor the construction of new buildings. Construction activities would be limited to rehabilitation of the existing building, and therefore, energy consumption during construction would be reduced compared the Proposed Project.

Under this alternative the 123,000 square foot industrial building would be occupied by a new industrial tenant. This alternative would not generate a long-term increase in fuel use and energy during project operation. Therefore, energy impacts would be reduced under this alternative. Energy is not a significant and unavoidable impact of the Proposed Project.

7.5.5 Geology and Soils

This alternative would not construct new buildings onsite, and therefore no grading or earthwork activities would occur. Since no new buildings would be constructed, no building considerations regarding expansive soils would occur. And, since no earthwork activities would occur, the likelihood of encountering paleontological resources would be lower than the Proposed Project's impacts. This alternative would reduce impacts related to geology and soils. Geology and soils are not a significant and unavoidable impact of the Proposed Project.

7.5.6 Greenhouse Gas Emissions

This alternative would not involve the demolition of the building on site nor the construction of new buildings. Construction activities would be limited to rehabilitation of the existing building, and therefore, energy consumption during construction would be reduced compared the Proposed Project.

Under this alternative the 123,000 square foot industrial building would be occupied by a new industrial tenant. The estimated VMT per day would be approximately 6,100, compared to 16,413 for the Proposed Project.

The Proposed Project would conflict with SCAG's RTP/SCS, since the Proposed Project's VMT/capita is higher than areawide baseline, and would result in a significant and unavoidable impact. This alternative would generate less VMT than the Proposed Project and considered environmentally superior with respect to GHG emissions.

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7.5.7 Hazards and Hazardous Materials

Since the early 1970s, the Project Site has operated as an industrial/manufacturing facility that assembled and manufactured measurement instrumentation. Since 2013 the Project Site, including the industrial building onsite, has been vacant. Under this alternative, the soils onsite would still be remediated to meet non-residential standards, which is a lower threshold than residential standards.

An industrial use has the potential to handle a larger quantity and more hazardous materials and chemicals than the Proposed Project. Since the Project Site is currently vacant, a new industrial tenant and vehicles onsite have the potential to cause the accidental release of pollutants into the environment; however, any new use on site under this alternative would be required to comply with all applicable federal, state and local regulations. Compliance with these regulations would ensure proper handling, storage, and use of potentially hazardous materials. However, hazards and hazardous materials is not a significant and unavoidable impact of the Proposed Project.

7.5.8 Hydrology and Water Quality

Since this alternative would not involve new construction, earthwork, nor expansion of the existing building, hydrology and drainage of the Project Site would remain unchanged. Additionally, the amount of pervious and impervious surfaces would remain the same. The industrial tenant would be required to comply with all applicable federal, state, and local laws and regulations governing water quality. The alternative would reduce impacts compared to the Proposed Project. Hydrology and water quality is not a significant and unavoidable impact of the Proposed Project.

7.5.9 Land Use and Planning

This alternative would not require a General Plan Amendment or a zone change. This alternative would be consistent with the existing zoning and land use designation for the Project Site. Therefore, the impacts to land use and planning would not occur. This alternative would reduce impacts related to land use and planning compared to the Proposed Project. Land use and planning is not a significant and unavoidable impact of the Proposed Project.

7.5.10 Noise

Since this alternative would not involve the construction of new buildings and rehabilitation activities would be limited to the existing building and paved areas, noise associated with construction would be minimal. This alternative would reduce impacts related to construction.

Operation-related noise under this alternative would be typical of industrial uses. Noise would include personal vehicles of employees and service/work trucks entering and leaving the site, loading and unloading activities. Industrial and manufacturing activities would be expected to occur within the existing building and would not be expected to generate a substantial amount of noise. Compared to the Proposed Project, operational noise would be reduced due to less people being onsite and less vehicle trips. Additionally, the highest level of activity

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on the Project Site would be expected to occur during standard business hours and would produce minimal noise during nighttime hours. Noise is a significant and unavoidable impact of the Proposed Project.

7.5.11 Population and Housing

As shown in Table 7-2 above, the buildout of this alternative would result in 246 employees and increase the jobs-housing ratio to 1.26 (under existing plus alternative condition). This alternative would not develop any housing units; therefore, population growth as a result of this alternative would be expected to be minimal. While this alternative is 0.03 points closer to the 1.3 to 1.7 recommended jobs-housing ratio range, this change would be minimal, and the current jobs-housing ratio would not be significantly impacted. As discussed in Chapter 5.11, Population and Housing, the City does not have an adequate supply of owner-occupied units. This alternative would not develop any owner-occupied units. Therefore, this alternative would not help meet the current demand for owner-occupied units. Since this alternative would not achieve some of the beneficial impacts of the Proposed Project related to housing, the impacts of this alternative are considered greater than the Proposed Project but would remain less than significant. Population and housing is not a significant and unavoidable impact of the Proposed Project.

7.5.12 Public Services

This alternative would result in 246 employees on site, who would generally be onsite during standard business hours. Additionally, this alternative would not directly contribute to population growth or student generation. Therefore, the demand for public services under this alternative would be less than the Proposed Project for fire protection, police protection, schools, and libraries. Public services is not a significant and unavoidable impact of the Proposed Project.

7.5.13 Transportation

Under this alternative, construction-related traffic would be reduced since construction would be limited to rehabilitation of the existing building. This alternative would not implement the roadway realignment to Rancho Viejo Road, and site access would remain the same as existing conditions. Average daily trips under this alternative would be approximately 415 trips, which would account for 1,191 fewer trips compared to the Proposed Project's 1,606 trips, which represents an approximately 74 percent reduction compared to the Proposed Project. Therefore, this alternative would add less traffic to the area roadway system, including intersections and roadway segments, compared to the Proposed Project.

The Proposed Project results in a significant and unavoidable impact relating to VMT. The estimated VMT per day would be approximately 6,100, compared to 16,413 for the Proposed Project. As a result, this alternative is considered environmentally superior with respect to transportation.

7.5.14 Tribal Cultural Resources

Under this alternative, the existing building on site would remain and no new buildings would be added. Therefore, the likelihood of encountering tribal cultural resources would be lower than the Proposed Project's impacts. Tribal cultural resources is not a significant and unavoidable impact of the Proposed Project.

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7.5.15 Utilities and Service Systems

No new development would occur on the Project Site under this Alternative. Additionally, this alternative would require approximately 246 employees compared to the Proposed Project's 581 residences. As such, this alternative would be expected to result in a reduced impact to water and telecommunication demand and wastewater and solid waste generation. Additionally, the Project Site would largely remain unchanged, and this alternative's impact on stormwater drainage would remain the same as existing conditions. Utilities and service systems is not a significant and unavoidable impact of the Proposed Project.

7.5.16 Wildfire

The Project Site is not within a very high fire hazard zone nor within a wildland-urban interface area. However, the City's interactive map identifies the Project Site and its surrounding area as a high fire hazard zone. This alternative would not place any residential units on site, and construction onsite would be limited to rehabilitating the existing building. As with the Proposed Project, this alternative would be required to comply with the California Fire Code and the City of San Juan Capistrano and Orange County Fire Authority's (OCFA) standards for fire protection, including the City's Municipal Code section 9-3.519 regarding fuel modification. This alternative would provide more opportunities for undeveloped areas, which could be prone to wildfire risks, compared to the Proposed Project's development that has more impervious and nonflammable surfaces. Therefore, this alternative would have greater impacts related to wildfire. Wildfire is not a significant and unavoidable impact of the Proposed Project.

7.5.17 Conclusion

The No Project/Existing Use Alternative would lessen the Proposed Project's insignificant environmental impacts in the areas of aesthetics, air quality, cultural resources, energy, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, public services, tribal cultural resources, and utilities and service systems. This alternative would increase impacts to population and housing and wildfire. This alternative would avoid the Proposed Project's significant impacts in greenhouse gas emissions and transportation.

The No Project/Existing Use Alternative would retain the Project Site as an industrial use. Therefore, only one of the project objectives would be achieved under this alternative. This alternative would not allow for the development of a variety of housing types consistent with the City's Housing Element (Objective #1); it would not provide for the transition of a vacant industrial parcel to residential uses (Objective #2); it would not create a diverse neighborhood with high-quality architectural and landscape design (Objective #3); and it would not incorporate a sustainable approach to development and design (Objective #4). Since this alternative would allow for a new industrial tenant, this alternative would meet Objective #5, redevelop a blighted industrial site that has been the site of homeless encampments, illegal fires, and various illegal activities.

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7.6 NEIGHBORHOOD RETAIL ALTERNATIVE

This alternative would construct a neighborhood commercial development of approximately 254,433 square feet on the Project Site, which would generate approximately 433 employees. The roadway realignment of Rancho Viejo Road would still occur. This alternative would require a zone change and General Plan amendment to Neighborhood Commercial District (NC) and Neighborhood Commercial (NC), respectively. Other discretionary actions such as approval of architectural control, grading plan modification, sign permit, and tree permit would be required, similar to the Proposed Project. However, a tentative tract map would not be required, as the Project Site would not be subdivided. In addition, a Specific Plan approval, Development Agreement, and Communities Facilities District would not be necessary. Average daily trips under this alternative would be approximately 9,605 trips, which would account for 7,999 trips more trips compared to the Proposed Project's 1,606 trips.

7.6.1 Aesthetics

This alternative would include a 254,433 square foot neighborhood commercial development, which is approximately 131,433 square feet larger than the existing building on site. Therefore, this alternative would more than double the square footage of the building on-site and provide two stories. Unlike the Proposed Project, this alternative would not include a wall nor gated entrance. Therefore, this alternative would have less of an aesthetic impact compared to the Proposed Project. Aesthetics is not a significant and unavoidable impact of the Proposed Project.

7.6.2 Air Quality

This alternative would result in a smaller building footprint compared to the Proposed Project. Therefore, construction-related air quality impacts would be slightly reduced compared to the Proposed Project.

During operation, the 254,433 square foot neighborhood commercial development would be expected to increase emission of criteria pollutants compared to the Proposed Project. Further, this alternative would be expected to generate approximately 9,505 daily trips, which represents an approximately 7,999 trip increase compared to the Proposed Project. This alternative would therefore result in a decrease in short-term construction impacts and increase in long-term operational air quality impacts compared to the Proposed Project. Air quality is not a significant and unavoidable impact of the Proposed Project.

7.6.3 Cultural Resources

Due to a decrease in building footprint compared to the Proposed Project, this alternative would be expected to reduce excavation, grading, and other earthwork activities compared to the Proposed Project. Therefore, the potential to encounter cultural resources would be lower than the Proposed Project. Similar to the Proposed Project, a mitigation measure that requires monitoring during certain grading and earthmoving activities would still be necessary. Compared to the Proposed Project, this alternative would reduce impacts to cultural resources due to having a smaller building footprint. Cultural resources are not a significant and unavoidable impact of the Proposed Project.

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7.6.4 Energy

This alternative would result in a smaller building footprint than the Proposed Project. In addition, the construction of one building instead of 188 residential units and clubhouse would reduce the amount of construction, which reduces the need for grading and shortens the construction schedule. Therefore, this alternative would consume less energy during construction than the Proposed Project.

The operation of this alternative would be expected to increase the energy demand of the building compared to the Proposed Project. This alternative increases vehicle trips compared to the Proposed Project. Therefore, transportation energy associated with this alternative would also be greater than the Proposed Project. Energy is not a significant and unavoidable impact of the Proposed Project.

7.6.5 Geology and Soils

This alternative would reduce the building footprint and would be anticipated to require less earthwork activities compared to the Proposed Project. As with the Proposed Project, this alternative would be required to comply with the most recent building code. Similar to the Proposed Project, a mitigation measure that addresses the impacts of expansive soils and fill settlement would still be necessary. Because this alternative reduces the building footprint, this alternative would reduce impacts to geology and soils. Geology and soils are not a significant and unavoidable impact of the Proposed Project.

This alternative would be expected to reduce excavation, grading and other earthwork activities compared to the Proposed Project. Therefore, the potential to encounter paleontological resources would be lower than the Proposed Project. Similar to the Proposed Project, a mitigation measure that requires implementation of a paleontological resource impact mitigation program and monitoring by a qualified paleontologist when disturbing native deposits would still be necessary. Compared to the Proposed Project, this alternative would reduce impacts to paleontological resources. Paleontological resources are not a significant and unavoidable impact of the Proposed Project.

7.6.6 Greenhouse Gas Emissions

This alternative would demolish the existing building on site, similar to the Proposed Project, and would develop an approximately 254,433 square foot neighborhood commercial building. Given the decrease in building footprint and number of buildings constructed compared to the Proposed Project, energy consumption and GHG emissions during construction would be reduced compared the Proposed Project.

This alternative would be expected to generate more GHG emissions during operation due to the building size and estimated vehicle trips. This alternative would generate approximately 9,605 trips, which would be approximately 7,999 trips more trips than the Proposed Project.

The Proposed Project would conflict with SCAG's RTP/SCS, since the Proposed Project's VMT/capita is higher than areawide baseline and would result in a significant and unavoidable impact. As further discussed in Section 7.6.13, Transportation, below, neighborhood retail projects are generally considered to be less than

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significant from VMT analyses. Therefore, this project would be consistent with SCAG's RTP/SCS. Under this alternative the significant and unavoidable impact would be reduced to a less than significant level.

While this alternative would eliminate the significant and unavoidable impact related to consistency with SCAG's RTP/SCS, it would be expected to increase GHG emissions. Therefore, this alternative would increase the GHG impact under this alternative.

7.6.7 Hazards and Hazardous Materials

The soils onsite would be remediated to meet non-residential standards to allow for the development of a neighborhood retail development, which is a lower threshold than residential standards. Similar to the Proposed Project, construction activities such as fuels, paints, and solvents would be used in limited quantities and would not pose a significant safety hazard. This alternative would be expected to disturb less soil onsite compared to the Proposed Project due to the smaller building footprint. The operation of a neighborhood retail development would be expected to use, store, and transport potentially hazardous products typical of neighborhood retail development, such as cleaning supplies. All handling of such potentially hazardous materials would be required to comply with all applicable federal, state, and local regulations to ensure proper use, storage, and transport. This alternative would reduce impacts related to hazardous materials compared to the Proposed Project. Hazards and hazardous materials is not a significant and unavoidable impact of the Proposed Project.

7.6.8 Hydrology and Water Quality

Since this alternative would have a smaller building footprint than the Proposed Project and impervious surfaces would be reduced, earthwork activities would be less than the Proposed Project. Hydrology and water quality impacts during construction would be less than the Proposed Project. And as with the Proposed Project, this alternative would be required to be graded in accordance with the National Pollutant Discharge Elimination System (NPDES) Construction General Permit requirements and incorporate appropriate BMPs. Full build out of this alternative would result in an increase of pervious surfaces on-site. This would allow more rainwater to percolate into the ground. This alternative would reduce impacts related to hydrology and water quality compared to the Proposed Project. Hydrology and water quality is not a significant and unavoidable impact of the Proposed Project.

7.6.9 Land Use and Planning

This alternative would not include a residential component. However, this alternative would require discretionary requests similar to the Proposed Project, including approval of Architectural Control, General Plan Amendment, Zone Change, Grading Plan Modification, and Tree Permit. This alternative would require a zone change and General Plan amendment to neighborhood commercial (NC) and neighborhood commercial (NC), respectively. As with the Proposed Project, this alternative would not be considered a project of regional significance and would therefore be consistent with SCAG's 2016-2040 RTP/SCS. Since this alternative would require a General Plan Amendment and a Zone Change, impacts under this alternative would be similar to the Proposed Project. Land use and planning is not a significant and unavoidable impact of the Proposed Project.

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7.6.10 Noise

The reduction in building square footage and number of buildings compared to the Proposed Project would reduce the construction noise impacts. Nevertheless, similar to the Proposed Project, it is still anticipated that this alternative would implement the identified mitigation measure to reduce the construction-related noise levels. However, the construction duration would be shortened, and the related construction noise would be reduced.

The operation of this alternative would produce noise typical of commercial development. Average daily trips under this alternative would increase compared to the Proposed Project. Thus, the operation of this alternative would increase the operational noise impact compared to the Proposed Project. This alternative would reduce impacts related to construction but would increase operational noise impacts. Noise is a significant and unavoidable impact of the Proposed Project.

7.6.11 Population and Housing

This alternative would generate 433 employees and increase the jobs-housing ratio to 1.28 (under existing plus alternative condition). This alternative would not develop any housing units. As such, this alternative would result in minimal population growth. While this alternative is 0.05 points closer to the 1.3 to 1.7 recommended jobs-housing ratio range, this change would be minimal, and the current jobs-housing ratio would not be significantly impacted. As discussed in Chapter 5.11, Population and Housing, the City does not have an adequate supply of owner-occupied units. This alternative would not include any owner-occupied units. As this alternative would not include the residential component, impacts would be slightly greater compared to the Proposed Project, but impacts would be less than significant. Population and housing is not a significant and unavoidable impact of the Proposed Project.

7.6.12 Public Services

This alternative would result in 433 employees on site, who would generally be onsite during standard business hours. Additionally, this alternative would not directly contribute to population growth or student generation. Therefore, the demand for public services under this alternative would be less than the Proposed Project for fire protection, police protection, schools, and libraries. Public services is not a significant and unavoidable impact of the Proposed Project.

7.6.13 Transportation

Under this alternative, construction-related traffic would be reduced since the number of buildings would decrease and the construction schedule would be reduced. Nevertheless, this alternative would be required to comply with identified plans, programs, and policies (PPP) T-1 and PPP T-2 relating to the City's Circulation Fee program and construction worksite staging and traffic control plan, respectively. This alternative would increase operation-related trips compared to the Proposed Project, as it would generate 7,999 more daily trips. The increase in vehicle trips would increase the roadway intersection and segment impacts. This alternative would necessitate similar site access as the Proposed Project and would need a mitigation measure requiring

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the submittal of street improvement plans for approval. Therefore, impacts to roadway intersections and segments would increase.

The Proposed Project results in a significant and unavoidable impact relating to VMT. Based on the Office of Planning and Research's Technical Advisory on Evaluating Transportation Impacts in CEQA, local-serving retail development tends to shorten trips and reduce VMT and are generally presumed to create a less than significant transportation impact related to VMT (OPR 2018). As such, this alternative's neighborhood retail use would be expected to result in a less than significant impact related to VMT. As a result, this alternative would be expected to improve the significant and unavoidable impact to a less than significant level. While this alternative would eliminate the significant and unavoidable impact, it would be expected to increase traffic impacts to intersections and segments. Nevertheless, impacts under this alternative would be reduced compared to the Proposed Project.

7.6.14 Tribal Cultural Resources

Due to a decrease in building footprint compared to the Proposed Project, this alternative would be expected to reduce excavation, grading, and other earthwork activities compared to the Proposed Project. Therefore, the potential to encounter tribal cultural resources would be lower than the Proposed Project. Similar to the Proposed Project, this alternative would need a mitigation measure requiring the retention of a qualified Native American monitor during construction-related ground disturbance activities. This alternative would reduce impacts relating to tribal cultural resources as compared to the Proposed Project. Tribal cultural resources is not a significant and unavoidable impact of the Proposed Project. Tribal cultural resources are not a significant and unavoidable impact of the Proposed Project.

7.6.15 Utilities and Service Systems

This alternative would result in approximately 433 employees, who would be onsite during standard business hours, compared to the Proposed Project's 581 residences. As such, this alternative would generate less water, electricity, gas, and telecommunication demand and generate less wastewater and solid waste compared to the Proposed Project. Additionally, given this alternative's reduction in impervious surfaces, it would likely reduce stormwater volume entering adjacent stormwater facilities. This alternative would reduce overall utilities and service systems demands compared to the Proposed Project. Utilities and service systems are not a significant and unavoidable impact of the Proposed Project.

7.6.16 Wildfire

The Project Site is not located within a very high fire hazard zone not a wildland-urban interface; however, the City's interactive map identifies the Project Site and surrounding area to be within a high fire hazard. This alternative would develop 254,433 square feet of neighborhood retail instead of the Proposed Project's 188 dwelling units. As with the Proposed Project, development under this alternative would be required to comply with the California Fire Code and the City of San Juan Capistrano and OCFA's standards for fire protection, including the City's Municipal Code section 9-3.519 regarding fuel modification. This alternative would provide more opportunities for undeveloped, natural areas, which could be prone to wildfire risks, compared to the

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Proposed Project's development that has more impervious and nonflammable surfaces. Therefore, this alternative would have greater impacts related to wildfire. Wildfire is not a significant and unavoidable impact of the Proposed Project.

7.6.17 Conclusion

The Neighborhood Retail Alternative would lessen the Proposed Project's insignificant environmental impacts in the areas of aesthetics, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, public services, tribal cultural resources, and utilities and service systems. This alternative would produce roughly equivalent impacts related to land use and planning as the Proposed Project. This alternative would increase impacts to air quality, energy, greenhouse gas emissions, noise, population and housing and wildfire. This alternative would avoid the Proposed Project's significant impacts in greenhouse gas emissions and transportation.

The Neighborhood Retail Alternative would not provide residential units. Therefore, only two of the five project objectives would be achieved under this alternative. This alternative would not allow for the development of a variety of housing types consistent with the City's Housing Element (Objective #1); it would not provide for the transition of a vacant industrial parcel to residential uses (Objective #2); and it would not create a diverse neighborhood with high-quality architectural and landscape design (Objective #3). However, this alternative would meet the Objective #4, Incorporate sustainable approaches to development and design, including water quality and landscape design techniques and Objective #5, Redevelop a blighted industrial site that has been the site of homeless encampments, illegal fires, and various illegal activities.

7.7 REDUCED DENSITY SINGLE-FAMILY ONLY ALTERNATIVE

This alternative would provide 150 single-family dwelling units and community pool and recreational area on site. This alternative accounts for an approximately 20 percent reduction in dwelling units compared to the Proposed Project. This alternative would follow the same guidelines and development standards outlined in the Creekside Specific Plan for single-family units, including a minimum of 2,000 square feet lot area per single family unit. The roadway realignment of Rancho Viejo Road would still occur. Similar to the Proposed Project, this alternative would require a zone change and General Plan amendment to Specific Plan and Specific Plan/Precise Plan, respectively, and would require all identified discretionary approvals outlined for the Proposed Project. This alternative would result in an average density of approximately 9.6 units/acre compared to the Proposed Project's average density of 12.1 units/acre. Average daily trips under this alternative would be approximately 1,416 trips, which would account for 190 fewer trips compared to the Proposed Project's 1,606 trips. This alternative would allow additional guest parking spaces to meet the 0.8 guest parking space per dwelling unit requirement under the San Juan Capistrano Municipal Code (SJCMC) Section 9-3.535.

7.7.1 Aesthetics

This alternative results in the development of 150 single-family detached units, 38 dwelling units fewer than the proposed 188 units under the Proposed Project. Additionally, this alternative would provide only single-family homes in lieu of the Proposed Project's housing mix containing from single-family and multi-family

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units. This represents a 20 percent decrease in dwelling units compared to the Proposed Project. This alternative would allow for more space onsite to be dedicated to common space, which may include landscaped areas and recreational amenities. This alternative would comply with the development standards and guidelines outlined in the Creekside Specific Plan. Compared to the Proposed Project, this alternative would be less dense across the entire Project Site. Similar to the Proposed Project, this alternative would also incorporate a wall around the Project Site. Therefore, this alternative would only slightly improve visual relief of the Project Site compared to the Proposed Project. Additionally, the decrease in the number of dwelling units onsite would reduce the amount of lighting and glare on the Project Site from buildings and vehicles. This alternative would have less aesthetic impacts compared to the Proposed Project. Aesthetics is not a significant and unavoidable impact of the Proposed Project.

7.7.2 Air Quality

This alternative would result in a decrease of 38 dwelling units compared to the proposed 188 units under the Proposed Project for a total of 150 dwelling units. This alternative's dwelling units could be arranged in a manner that decrease the amount of grading required. In addition, the decrease in the amount of dwelling units would also reduce the amount of construction needed. Both the reduced grading and construction would reduce construction-related air quality impacts compared to the Proposed Project. During operation, this alternative would be expected to generate approximately 1,416 daily trips, which represents an approximately 190 trip reduction compared to the Proposed Project. This alternative would therefore result in a decrease in short-term construction impacts and long-term operational air quality impacts compared to the Proposed Project. Air quality is not a significant and unavoidable impact of the Proposed Project.

7.7.3 Cultural Resources

Due to less homes being constructed, this alternative would be expected to reduce excavation, grading, and other earthwork activities compared to the Proposed Project. Therefore, the potential to encounter cultural resources would be lower than the Proposed Project. Similar to the Proposed Project, a mitigation measure that requires monitoring during certain grading and earthmoving activities would still be necessary. Compared to the Proposed Project, this alternative would reduce impacts to cultural resources due to less building area. Cultural resources are not a significant and unavoidable impact of the Proposed Project.

7.7.4 Energy

Under this alternative, the number of residential units would be reduced to 150 dwelling units from the proposed 188 units. This alternative is anticipated to result in a reduction in energy impacts compared to the Proposed Project. Energy is not a significant and unavoidable impact of the Proposed Project.

7.7.5 Geology and Soils

This alternative would develop fewer units and would require less earthwork activities. As with the Proposed Project, this alternative would be required to comply with the most recent building code. Similar to the Proposed Project, a mitigation measure that addresses the impacts of expansive soils and fill settlement would still be

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necessary. Because this alternative reduces the number of units onsite, this alternative would reduce impacts to geology and soils. Geology and soils are not a significant and unavoidable impact of the Proposed Project.

This alternative would be expected to reduce excavation, grading and other earthwork activities compared to the Proposed Project. Therefore, the potential to encounter paleontological resources would be lower than the Proposed Project. Similar to the Proposed Project, a mitigation measure that requires implementation of a paleontological resource impact mitigation program and monitoring by a qualified paleontologist when disturbing native deposits would still be necessary. Compared to the Proposed Project, this alternative would reduce impacts to paleontological resources due to less building area. Paleontological resources are not a significant and unavoidable impact of the Proposed Project.

7.7.6 Greenhouse Gas Emissions

This alternative would contribute to global climate change through direct emissions of GHG from onsite area sources and vehicle trips generated. However, a decrease in the number of units and building area would result in reduced construction-related trips. During long-term operation, vehicle trips, and off-site energy production would be reduced when compared to the Proposed Project. GHG emissions impacts of this alternative would be less than the Proposed Project.

The Proposed Project would conflict with SCAG's RTP/SCS, since the Proposed Project's VMT/capita is higher than areawide baseline and would result in a significant and unavoidable impact. As discussed in Section 7.6.13, Transportation, below, this alternative would result in an increase in VMT/capita. Therefore, this alternative would worsen the significant and unavoidable impact.

7.7.7 Hazards and Hazardous Materials

The Project Site has operated as a manufacturing/industrial facility since the 1970 until 2013. All hazardous material concerns and remediation programs under this alternative would be identical to those encountered under the Proposed Project. The decrease in the number of units would decrease the amount of potentially hazardous materials during construction and operation. As a result, impacts related to hazards and hazardous materials would be reduced compared the Proposed Project. Hazards and hazardous materials is not a significant and unavoidable impact of the Proposed Project.

7.7.8 Hydrology and Water Quality

Since this alternative would develop a smaller number of homes, it would preserve more land as landscaped areas or recreational space. Therefore, excavation, grading and other earthwork activities would be less than the Proposed Project, and hydrology and water quality impacts during construction would be less than the Proposed Project. And as with the Proposed Project, this alternative would be required to be graded in accordance with the NPDES Construction General Permit requirements and incorporate appropriate BMPs. Full build out of this alternative would result in an increase of pervious surfaces on-site since more area would be dedicated to landscaping and recreation. This would allow more rainwater to percolate into the ground. This alternative would reduce impacts related to hydrology and water quality compared to the Proposed Project. Hydrology and water quality is not a significant and unavoidable impact of the Proposed Project.

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7.7.9 Land Use and Planning

This alternative would require the same discretionary requests as the Proposed Project, which includes approval of Architectural Control, General Plan Amendment, Zone Change, Grading Plan Modification, Tentative Tract Map, and Tree Permit. As with the Proposed Project, this alternative would not be considered a project of regional significance and would therefore be consistent with SCAG's 2016-2040 RTP/SCS. Additionally, this alternative's anticipated housing units and population (464 residents) would be within SCAG's growth projections for the City.

This alternative would provide less diversity in units compared to the Proposed Project, since it would only include single-family residential units. As such, this alternative would meet, but to a lesser degree, the City's Housing Element Goal 1 and Policy 1.1 of providing a broad range of housing opportunities that meet the special needs of communities and providing a range of different housing types and unit sizes for varying income ranges and lifestyles. The City's Circulation Element established LOS D as a goal during the morning and evening peak commute hours at all City intersections, and LOS E during the morning and evening peak commute hours at all City-designated "Hot Spot" intersections. The Proposed Project would result in cumulative LOS impact on two study intersections and require mitigation measure to maintain the Circulation Element's LOS goal. Because this alternative would result in approximately 11.8 percent less trips, it would also reduce traffic impact on area intersections. As with the Proposed Project, this alternative would also require implementation of MM LU-1 and compliance with PPP LU-2 and LU-3. This alternative would allow the Specific Plan to meet the 0.8 guest parking space per dwelling unit standard established under the SJCMC Section 9-3.535. This alternative's impact to land use and planning is less than significant and similar to the Proposed Project. Land use and planning is not a significant and unavoidable impact of the Proposed Project.

7.7.10 Noise

The reduction in the number of units would decrease the construction noise impacts. This alternative would still be anticipated to implement the identified mitigation measure to reduce construction-related noise levels. However, the construction duration would be shortened, and the related construction noise would be reduced.

The reduction in number of units would also reduce the number of residents onsite, which reduces residential noise and traffic noise. Thus, the operation of this alternative would reduce the operational noise impact compared to the Proposed Project. This alternative would reduce impacts related to both construction and operational noise. Noise is a significant and unavoidable impact of the Proposed Project.

7.7.11 Population and Housing

As shown in Table 7-2 above, the buildout of this alternative would result in 150 dwelling units and 464 new residents, which is 38 dwelling units and 117 fewer residents than the Proposed Project. Similar to the Proposed Project, this alternative would be within the anticipated population and housing growth in the City of San Juan Capistrano. The jobs-to-housing ratio for this alternative would be 1.23, same as the Proposed Project's 1.23. Under this alternative, no multifamily residential units would be provided. Changes to the jobs-housing ratio is negligible, and the current jobs-housing ratio would not be significantly impacted. As discussed in Chapter 5.11,

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Population and Housing, the City does not have an adequate supply of owner-occupied units. This alternative would reduce the range of unit types provided on site and provide less opportunity for owner-occupied units. Therefore, this alternative would meet less of the current demand for owner-occupied units compared to the Proposed Project. Population and housing is not a significant and unavoidable impact of the Proposed Project.

7.7.12 Public Services

This alternative would reduce the number of residential units at the Project Site and therefore the number of residents at the Project Site as compared to the Proposed Project. Therefore, this alternative's impact on fire, police, school, and libraries would be less than the Proposed Project. Similar to the Proposed Project, this alternative would be required to coordinate with the City, OCFA, and OCSD during construction of the project. With regards to fire services, this alternative would be anticipated to require secured fire protection agreement similar to the Proposed Project. Development of this alternative would comply with all applicable regulations of the California Building and Fire Codes and comply with the City's fuel modification program. With regards to schools, this alternative would comply with AB 2926 and SB 50 for the payment of development impact fees. This alternative would create less demands for public services, therefore, would have reduce impacts on public services compared to the Proposed Project. Public services are not a significant and unavoidable impact of the Proposed Project.

7.7.13 Transportation

Under this alternative, construction-related traffic would be reduced compared to the Proposed Project since there would be a reduction in residential units. Nevertheless, this alternative would be required to comply with identified PPP T-1 and PPP T-2 relating to the City's Circulation Fee program and construction worksite staging and traffic control plan, respectively. This alternative would also reduce operation-related trips compared to the Proposed Project, as it would generate 190 trips fewer daily trips (a reduction of approximately 11.8 percent). The reduction in vehicle trips would reduce the roadway intersection and segment impacts. This alternative would necessitate similar site access as the Proposed Project and would need a mitigation measure requiring the submittal of street improvement plans for approval.

This alternative would generate approximately 1,416 daily vehicle trips, which represents an approximately 11.8 percent decrease compared to the Proposed Project. As a result, an 11.8 percent decrease in vehicle trips equates to 14,471.24 VMT¹ and a VMT/capita of 31.22². As such, this alternative's VMT/capita is 2.97 points higher than the Proposed Project's VMT/capita of 28.25. For this reason, this alternative would worsen the significant and unavoidable impact.

7.7.14 Tribal Cultural Resources

Due to the lower unit count, grading and earthwork activities would also be reduced compared to the Proposed Project and the potential to encounter tribal cultural resources would be lowered. Due to the earthwork activities, potential impacts still exist to subsurface tribal cultural resources. Similar to the Proposed Project,

¹ 16,413 VMT for the Proposed Project /1,606 total trips = 10.22 VMT per trip. 10.22 VMT X 1,416 trips= 14,471.24 VMT

² 14,471.24 VMT/464 population = 31.22 VMT/capita

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this alternative would need a mitigation measure requiring the retention of a qualified Native American monitor during construction-related ground disturbance activities. This alternative would reduce impacts relating to tribal cultural resources as compared to the Proposed Project. Tribal cultural resources is not a significant and unavoidable impact of the Proposed Project.

7.7.15 Utilities and Service Systems

This alternative would result in 38 fewer dwelling units compared to the Proposed Project. The alternative would generate less water, electricity, gas, and telecommunication demand and generate less wastewater and solid waste compared to the Proposed Project. Additionally, given this alternative's reduction in impervious surfaces, it would likely reduce stormwater volume entering adjacent stormwater facilities. This alternative would reduce overall utilities and service systems demands compared to the Proposed Project. Utilities and service systems are not a significant and unavoidable impact of the Proposed Project.

7.7.16 Wildfire

The Project Site is not located within a very high fire hazard zone not a wildland-urban interface; however, the City's interactive map identifies the Project Site and surrounding area to be within a high fire hazard. This alternative would place 150 dwelling units instead of the Proposed Project's 188 dwelling units. As with the Proposed Project, development under this alternative would be required to comply with the California Fire Code and the City of San Juan Capistrano and OCFA's standards for fire protection, including the City's Municipal Code section 9-3.519 regarding fuel modification. This alternative would have a similar impact relating to wildfire as the Proposed Project. Wildfire is not a significant and unavoidable impact of the Proposed Project.

7.7.17 Conclusion

The Reduced Density Single-Family Only Alternative would lessen the Proposed Project's insignificant environmental impacts in the areas of aesthetics, air quality, cultural resources, energy, geology and soils, hazards and hazardous materials, hydrology and water quality, noise, public services, tribal cultural resources, and utilities and service systems. This alternative would produce roughly equivalent impacts related to land use and planning and wildfire as the Proposed Project. This alternative would increase impacts to population and housing. With regards to greenhouse gas emissions, this alternative would reduce greenhouse gas emissions during construction and operation due to the decrease in housing units. However, this alternative would worsen the significant and unavoidable impact relating to consistency with SCAG's RTP/SCS because VMT/capita increases. With regards to transportation, this alternative would reduce vehicles on the surrounding roadway system. However, this alternative increases VMT/capita and therefore worsens the significant and unavoidable impact. As such, this alternative would worsen the Proposed Project's significant impacts in greenhouse gas emissions and transportation.

This alternative would reduce the number of residential units onsite and would only provide single-family homes. Therefore, this alternative would only meet four of the five project objectives. This alternative would not meet Objective #1, as this alternative would not allow for the development of a variety of housing types

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consistent with the City's Housing Element. This alternative would meet Objective #2 as it would provide for the transition of a vacant industrial parcel to residential uses consistent with existing residential neighborhoods; Objective #3 as it would create a cohesive but diverse neighborhood through high quality architecture and landscape design; Objective #4 as it would incorporate sustainable approaches to development and design, including water quality and landscape design techniques; and Objective #5 as it would redevelop a blighted industrial site.

7.8 REDUCED DENSITY ALTERNATIVE

This alternative would provide 106 single-family detached dwelling units (37 traditional and 69 cottages) and 68 attached multi-family units for a combined total of 174 units. Therefore, it would reduce the number of single-family unit by one unit, and reduce the number of multi-family units by 13 units compared to the Proposed Project. This alternative would result in an average density of approximately 11.18 units/acre compared to the Proposed Project's average density of 12.1 units/acre. Figure 7-1, *Reduced Density Alternative Site Plan*, illustrates site layout for this alternative. As shown, the number of lots for multi-family units was reduced from two to one lot, and the multi-family unit layout has been modified to be clustered perpendicular to the north property line rather than the proposed parallel configuration. This alternative would provide more common open space and recreation areas with more amenities compared to the Proposed Project. This alternative would slightly modify the internal circulation pattern for the multi-family lot from the Proposed Project. Under this alternative, 348 garage spaces and 142 guest parking spaces would be provided, therefore, the required guest parking ratio of two spaces per dwelling unit and 0.8 space per dwelling unit in compliance with the SJCMC Section 9-3.535 would be met. This alternative would follow the same guidelines and development standards outlined in the Creekside Specific Plan for single-family and multi-family units. The roadway realignment of Rancho Viejo Road would still occur. As with the Proposed Project, this alternative would require a zone change and General Plan amendment to Specific Plan and Specific Plan/Precise Plan, respectively, and would require all identified discretionary approvals outlined for the Proposed Project. This alternative would reduce the overall units by approximately 7.4 percent compared to the Proposed Project. Average daily trips under this alternative would be approximately 1,518 trips, which would account for 88 fewer trips compared to the Proposed Project's 1,606 trips.

7.8.1 Aesthetics

This alternative results in the development of 174 dwelling units (106 single-family detached units and 68 multi-family attached units), 14 dwelling units fewer than the proposed 188 units under the Proposed Project. This represents a 7.4 percent decrease in dwelling units compared to the Proposed Project. This alternative would comply with the similar development standards and design guidelines outlined in the Creekside Specific Plan. Therefore, it would have the same maximum density, maximum height limit of 35 feet, and other standards such as setbacks, lot coverage ratio, and floor area ratios. as the Proposed Project. Therefore, it would provide similar visual quality and character as the Proposed Project. However, it would provide more common open space and creational amenities. No changes to the wall and fences guidelines would occur, and similar landscaped areas and recreational amenities as the Proposed Project would be provided. Compared to the Proposed Project, this alternative would be less dense across the entire Project Site and more uncovered parking spaces would be provided. The decrease in the number of dwelling units onsite would also reduce the amount

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of lighting and glare on the Project Site from buildings and vehicles. This alternative would have less aesthetic impacts compared to the Proposed Project. Aesthetics is not a significant and unavoidable impact of the Proposed Project.

7.8.2 Air Quality

This alternative would result in a decrease of 14 dwelling units compared to the proposed 188 units under the Proposed Project for a total of 174 dwelling units. The decrease in the number of dwelling units would also reduce the amount of construction needed, therefore construction-related air emission would be reduced. During operation, this alternative would be expected to generate approximately 1,498 daily trips, which represents an approximately 108 trip reduction compared to the Proposed Project. This alternative would therefore result in a decrease in short-term construction impacts and long-term operational air quality impacts compared to the Proposed Project. Air quality is not a significant and unavoidable impact of the Proposed Project.

7.8.3 Cultural Resources

Under this alternative, a total of 106 single-family lots and one multi-family lot would be created, instead of 107 single-family lots and two multi-family lots under the Proposed Project. And the number of units would be reduced from 188 units to 174 units, therefore, reducing excavation, grading, and other earthwork activities compared to the Proposed Project. Therefore, the potential to encounter cultural resources would be lower than the Proposed Project. Similar to the Proposed Project, a mitigation measure that requires monitoring during certain grading and earthmoving activities would still be necessary. Compared to the Proposed Project, this alternative would reduce impacts to cultural resources due to less building area. Cultural resources are not a significant and unavoidable impact of the Proposed Project.

7.8.4 Energy

Under this alternative, the number of residential units would be reduced to 174 dwelling units from the proposed 188 units, a reduction of approximately 7.4 percent. Therefore, this alternative would demand less gas, electricity, and transportation energy compared to the Proposed Project both during construction and operation. As with the Proposed Project, this alternative would ensure that construction equipment maintains and meets the appropriate tier ratings per CALGreen or EPA emissions standards, so that it would not result in wasteful, inefficient, or unnecessary use of energy during construction. The units would be constructed to meet the Building Energy Efficiency Standards and CALGreen so that wasteful or unnecessary use of gas or electricity does not occur. This alternative would reduce impacts to energy compared to the Proposed Project. Energy is not a significant and unavoidable impact of the Proposed Project.

Figure 7-1 - Reduced Density Alternative Site Plan
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Source: Land Concern, 2020

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7.8.5 Geology and Soils

This alternative would develop 14 fewer units and would require less earthwork activities. As with the Proposed Project, this alternative would be required to comply with the most recent building code. Similar to the Proposed Project, a mitigation measure that addresses the impacts of expansive soils and fill settlement would still be necessary. Because this alternative reduces the number of units onsite, this alternative would reduce impacts to geology and soils. Geology and soils are not a significant and unavoidable impact of the Proposed Project.

This alternative would be expected to reduce excavation, grading and other earthwork activities compared to the Proposed Project. Therefore, the potential to encounter paleontological resources would be lower than the Proposed Project. Similar to the Proposed Project, a mitigation measure that requires implementation of a paleontological resource impact mitigation program and monitoring by a qualified paleontologist when disturbing native deposits would still be necessary. Compared to the Proposed Project, this alternative would reduce impacts to paleontological resources due to less building area. Paleontological resources are not a significant and unavoidable impact of the Proposed Project.

7.8.6 Greenhouse Gas Emissions

This alternative would contribute to global climate change through direct emissions of GHG from onsite area sources and vehicle trips generated. However, a decrease in the number of units and building area would result in reduced construction and operation-related trips. The Proposed Project is anticipated to result in 2,881 MTCO₂e of GHG emissions per year, which does not exceed the proposed SCAQMD Bright-Line threshold of 3,000 MTCO₂e. During long-term operation, vehicle trips, and off-site energy production would be reduced when compared to the Proposed Project. GHG emissions impacts of this alternative would be less than the Proposed Project. Approximately 65 percent (1,831 MTCO₂e) of the total GHG emissions from the Proposed Project is from mobile sources and approximately 23 percent (659 MTCO₂e) is from the energy sources. Therefore, since the trips related to this alternative is approximately 6.7 percent less than the Proposed Project, from 1,606 trips to 1,498, and there will be 14 units fewer than the Proposed Project, the GHG emissions associated with this alternative would also be less than the Proposed Project.

The Proposed Project is projected to result in 28.25 VMT/capita, which exceeds the City's baseline VMT per capita of 21.37. VMT impact is considered significant if a residential project exceeds the recommended threshold of 15 percent below the baseline, therefore, if exceeds 18.17 VMT/capita. Under this alternative, the projected VMT is 28.47 (see calculation in Section 7.8.13, Transportation). Therefore, this alternative would result in greater VMT than the Proposed Project, and as with the Proposed Project, this alternative would be inconsistent with the SCAG's RTP/SCS goal of reducing VMT. VMT impact is a significant and unavoidable impact of the Proposed Project and this alternative would worsen the significant and unavoidable impact.

7.8.7 Hazards and Hazardous Materials

The Project Site has operated as a manufacturing/industrial facility since the 1970 until 2013. All hazardous material concerns and remediation programs under this alternative would be identical to those encountered under the Proposed Project. The same PPPs and mitigation measure would be required to be implemented to

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reduce potential impacts to residential occupants. The decrease in the number of units would decrease the amount of potentially hazardous construction materials during construction. Hazardous materials impact is not anticipated during residential operation. As a result, impacts related to hazards and hazardous materials would be similar to the Proposed Project. Hazards and hazardous materials impact is not a significant and unavoidable impact of the Proposed Project.

7.8.8 Hydrology and Water Quality

This alternative would develop a smaller number of homes. However, the area of impervious surfaces would be similar to the Proposed Project as more guest parking spaces would be provided. This alternative would provide similar landscaped areas or recreational space areas as the Proposed Project. However, with fewer units, excavation, grading and other earthwork activities would be less than the Proposed Project, and the construction duration would also be shortened. Therefore, hydrology and water quality impacts during construction would be less than the Proposed Project. And as with the Proposed Project, this alternative would be required to be graded in accordance with the NPDES Construction General Permit requirements and incorporate appropriate BMPs. This alternative would reduce impacts related to hydrology and water quality compared to the Proposed Project. Hydrology and water quality is not a significant and unavoidable impact of the Proposed Project.

7.8.9 Land Use and Planning

This alternative would require the same discretionary requests as the Proposed Project, which includes approval of Architectural Control, General Plan Amendment, Zone Change, Grading Plan Modification, Tentative Tract Map, and Tree Permit. As with the Proposed Project, this alternative would not be considered a project of regional significance and would therefore be consistent with SCAG's 2016-2040 RTP/SCS. Additionally, this alternative's anticipated housing units and population (538 residents) would be within SCAG's growth projections for the City.

This alternative would provide 68 multi-family units and 106 single-family units. As such, similar to the Proposed Project, this alternative would be consistent with various goals and policies of the General Plan by providing a broad range of housing opportunities that meet the special needs of communities and providing a range of different housing types and unit sizes for varying income ranges and lifestyles. This alternative would reduce the project trips by approximately 6.7 percent and also be required to implement MM LU-1, PPP LU-2 and PPP LU-3 to ensure that the City's established goal of LOS D is met. This alternative would provide guest parking ratio that meets the City's 0.8 space per dwelling unit standard, whereas the Proposed Project would provide a parking ratio of 0.5 space per dwelling unit. Therefore, this alternative is consistent with the SJCMC Section 9-3.535. This alternative would result in land use impact that is less than the Proposed Project. Land use impact is not a significant and unavoidable impact of the Proposed Project.

7.8.10 Noise

The reduction in the number of units would decrease the construction noise impacts. This alternative would still be anticipated to implement the identified mitigation measure to reduce the construction-related noise

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levels. However, the construction duration would be shortened, and the related construction noise would be reduced.

The reduction in number of units would also reduce the number of residents onsite, which reduces residential noise and traffic noise. Thus, the operation of this alternative would reduce the operational noise impact compared to the Proposed Project. This alternative would reduce impacts related to both construction and operational noise. Noise is a significant and unavoidable impact of the Proposed Project.

7.8.11 Population and Housing

This alternative would result in 174 dwelling units and 538 new residents, which is 14 dwelling units and 43 fewer residents than the Proposed Project. Similar to the Proposed Project, this alternative would be within the anticipated population and housing growth in the City of San Juan Capistrano. The jobs-to-housing ratio for this alternative would be 1.23, same as the Proposed Project's 1.23. Therefore, the Proposed Project would have similar population and housing impacts as the Proposed Project. Population and housing is not a significant and unavoidable impact of the Proposed Project.

7.8.12 Public Services

This alternative would reduce the number of residential units at the Project Site and therefore the number of residents at the Project Site as compared to the Proposed Project. Therefore, this alternative's impact on fire, police, school, and libraries would be less than the Proposed Project. Similar to the Proposed Project, this alternative would be required to coordinate with the City, OCFA, and OCSD during construction of the project. With regards to fire services, this alternative would be anticipated to require secured fire protection agreement similar to the Proposed Project. Development of this alternative would comply with all applicable regulations of the California Building and Fire Codes and comply with the City's fuel modification program. With regards to schools, this alternative would comply with AB 2926 and SB 50 for the payment of development impact fees. This alternative would create less demands for public services, therefore, would have reduce impacts on public services compared to the Proposed Project. Public services are not a significant and unavoidable impact of the Proposed Project.

7.8.13 Transportation

Under this alternative, construction-related traffic would be reduced compared to the Proposed Project since there would be a reduction in residential units. Nevertheless, this alternative would be required to comply with identified plans, programs, and policies (PPP) T-1 and T-2 relating to the City's Circulation Fee program and construction worksite staging and traffic control plan, respectively. This alternative would also reduce operation-related trips compared to the Proposed Project, as it would generate 108 trips fewer daily trips (a reduction of approximately 6.7 percent). The reduction in vehicle trips would reduce the roadway intersection and segment impacts. This alternative would necessitate similar site access as the Proposed Project and would need a mitigation measure requiring the submittal of street improvement plans for Rancho Viejo Road, Malaspina Road, and the project driveway for approval. This alternative would modify the internal circulation pattern for Lot 1 for townhomes compared to the Proposed Project. However, as with the Proposed Project, adequate

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private street width would be provided to ensure that emergency vehicle access is provided. In addition, as shown in Figure 7-1, access from the existing southern access way would not change from the Proposed Project.

This alternative would generate approximately 1,498 daily vehicle trips, resulting in approximately 15,309.26 VMT³ and a VMT per capita of 28.47⁴. Therefore, this alternative's VMT/capita is 0.22 points higher than the Proposed Project's VMT/capita of 28.25. For this reason, this alternative would worsen the significant and unavoidable impact.

7.8.14 Tribal Cultural Resources

Due to the lower unit count, grading and earthwork activities would also be reduced compared to the Proposed Project and the potential to encounter tribal cultural resources would be lowered. Due to the earthwork activities, potential impacts still exist to subsurface tribal cultural resources. Similar to the Proposed Project, this alternative would need a mitigation measure requiring the retention of a qualified Native American monitor during construction-related ground disturbance activities. This alternative would reduce impacts relating to tribal cultural resources as compared to the Proposed Project. Tribal cultural resources is not a significant and unavoidable impact of the Proposed Project.

7.8.15 Utilities and Service Systems

This alternative would result in 14 fewer dwelling units compared to the Proposed Project. The alternative would generate less water, electricity, gas, and telecommunication demand and generate less wastewater and solid waste compared to the Proposed Project. Additionally, given this alternative's reduction in impervious surfaces, it would likely reduce stormwater volume entering adjacent stormwater facilities. This alternative would reduce overall utilities and service systems demands compared to the Proposed Project. Utilities and service systems are not a significant and unavoidable impact of the Proposed Project.

7.8.16 Wildfire

The Project Site is not located within a very high fire hazard zone not a wildland-urban interface; however, the City's interactive map identifies the Project Site and surrounding area to be within a high fire hazard. This alternative would place 174 dwelling units instead of the Proposed Project's 188 dwelling units. As with the Proposed Project, development under this alternative would be required to comply with the California Fire Code and the City of San Juan Capistrano and OCFA's standards for fire protection, including the City's Municipal Code section 9-3.519 regarding fuel modification. This alternative would have a similar impact relating to wildfire as the Proposed Project. Wildfire is not a significant and unavoidable impact of the Proposed Project.

³ 16,413 VMT for the Proposed Project /1,606 total trips = 10.22 VMT per trip. 10.22 VMT X 1,498 trips= 15,309.26 VMT

⁴ 15,309.26 VMT/538 population = 28.47 VMT/capita

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7.8.17 Conclusion

The Reduced Density Alternative would lessen the Proposed Project's insignificant environmental impacts in the areas of aesthetics, air quality, cultural resources, energy, geology and soils, hydrology and water quality, land use and planning, noise, public services, tribal cultural resources, and utilities and service systems. This alternative would produce roughly equivalent impacts related to hazards and hazardous materials, population and housing, and wildfire as the Proposed Project. It would also provide adequate parking spaces for visitors in compliance with the SJCMC. With regards to greenhouse gas emissions, this alternative would reduce greenhouse gas emissions during construction and operation due to the decrease in housing units. However, this alternative would worsen the significant and unavoidable impact relating to consistency with SCAG's RTP/SCS because VMT/capita increases. With regards to transportation, this alternative would reduce vehicles on the surrounding roadway system. However, this alternative increases VMT/capita and therefore worsens the significant and unavoidable impact. As such, this alternative would worsen the Proposed Project's significant impacts in greenhouse gas emissions and transportation.

The Reduced Density Alternative would reduce the number of residential units onsite while meeting all of the five project objectives. This alternative would meet Objective #1, as this alternative would allow for the development of a variety of housing types consistent with the City's Housing Element; Objective #2 as it would provide for the transition of a vacant industrial parcel to residential uses consistent with existing residential neighborhoods; Objective #3 as it would create a cohesive but diverse neighborhood through high quality architecture and landscape design; Objective #4 as it would incorporate sustainable approaches to development and design, including water quality and landscape design techniques; and Objective #5 as it would redevelop a blighted industrial site.

7.9 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. Three alternatives have been identified as "environmentally superior" to the Proposed Project:

- No Project/No Development Alternative
- No Project/Existing Use Alternative
- Neighborhood Retail Alternative

The No Project/No Development Alternative and No Project/Existing Use Alternatives have the least impact to the environment because both would maintain the existing industrial use on site. The No Project/No Development Alternative would keep the Project Site vacant. The No Project/Existing Use Alternative would rehabilitate the existing building, and it would not involve the construction of new buildings or alteration of landforms. Both No Project alternatives would reduce all impacts compared to the Proposed Project, except for population and housing and wildfire. However, the No Project Alternatives would not achieve any of the objectives established for the project. In addition, the potential for development of the site at some future date

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would not be precluded, since the applicant could submit alternative development plans if the Proposed Project were not approved.

The Neighborhood Retail Alternative lessens the significant and unavoidable impacts in greenhouse gas emissions and transportation to a less than significant level. However, this alternative would only meet two project objectives and would not contribute to the diversity of housing in the City consistent to the Housing Element.

“Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts” (CEQA Guidelines § 15126.6[c]). These factors will be considered by the City of San Juan Capistrano decision-makers in determining whether to approve the Proposed Project or one of the alternative identified above.

7.10 REFERENCES

California Governor’s Office of Planning and Research (OPR). 2018, December. Technical Advisory on Evaluating Transportation Impacts in CEQA. http://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf.

United States Green Building Council. 2008. Building Area per Employee Business Type.