



Chapter 9

Project Alternatives

9.1 Introduction

In order to fully evaluate the environmental effects of projects, the California Environmental Quality Act (CEQA) mandates that alternatives to the project be analyzed. Section 15126.6 of the CEQA Guidelines requires the discussion of “a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project” and the evaluation of the comparative merits of the alternatives. The alternatives discussion is intended to “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. Potential alternatives to the project generally may include: alternatives considered but rejected; a no project alternative, and an environmentally superior alternative. CEQA does not require an EIR to consider every conceivable alternative to a project; however, the Lead Agency must consider a reasonable range of potentially feasible alternatives.

As discussed in Chapter 4.0, buildout of the HEU could result in significant, direct, and/or cumulative environmental impacts related to, aesthetics, air quality, biological resources, cultural resources (historical, archeological and paleontological), greenhouse gas emissions, hazards (accidental release), hydrology and water quality (flooding/inundation), land use compatibility (noise, traffic), noise, and traffic capacity. A mitigation framework that would be implemented by future development in accordance with the HEU has been identified that would reduce all direct and cumulative impacts to below a level of significance, with the exception of aesthetics, air quality, cultural resources (historical and archeological), greenhouse gas emissions, land use compatibility (traffic) and traffic capacity impacts.

In developing the alternatives to be addressed in this section, consideration was given to their ability to meet the basic objectives of the project and eliminate or substantially reduce significant environmental impacts. As identified in Chapter 3.0, project objectives include the following:

Housing Element Update

1. **Housing Choice.** Accommodate a variety of housing types to meet the needs of all Encinitas residents, creating opportunities for attainably-priced housing for all income groups.
2. **Adequate Supply.** Provide adequate sites with corresponding density to meet the City's Regional Housing Needs Assessment allocation, inclusive of prior planning cycle carryover housing units.
3. **Effective Implementation.** Deliver State-mandated and locally desired programs to implement the City's Housing Element.

Housing Mapping Strategies

1. **Maintain Community Character.** Integrate future development using a blend of two- and three-story buildings or building elements into the City's seven community character contexts through appropriately located sites and project design, and embrace the unique cultural identities expressed in each of the five communities.
2. **Emphasize Mixed Use.** Accommodate mixed use, walkable places in key activity centers of every Encinitas community, while allowing for some standalone housing.
3. **Achieve a Variety of Neighborhood Types.** Provide a mix of building types and varied site designs that incorporate existing community character contexts to achieve a variety of neighborhood types in which to develop new housing and mixed use.
4. **Consider Infrastructure Conditions.** Ensure adequate infrastructure to support new housing by locating future development in areas that have existing or potential capacity for infrastructure and public services to accommodate it.
5. **Address Mobility Needs.** Maintain or enhance community access and mobility networks.
6. **Strive for a Sustainable Encinitas.** Coordinate planning for land use, transportation and housing to reduce environmental impacts and preserve a natural, healthy environment.
7. **Strengthen the Local Economy.** Locate housing in the right places to grow the economy organically by supporting local businesses and making the City more fiscally sustainable.
8. **Equitably Distribute Multi-family Housing.** Distribute attached and multi-family housing to the City's five communities.

A discussion of the Alternatives Considered but Rejected is presented in this section. In addition, Alternatives that would reduce or avoid significant environmental effects of the project are then discussed. These alternatives include the No Project (Development Under

the Adopted Plan) Alternative as required by CEQA. In addition, an alternative to the HEU housing strategies, the Sustainable Mixed Use Places (SMUP) Alternative, is addressed. As described in more detail in Section 9.3.2, the SMUP Alternative was designed to incorporate those housing sites that: (1) have fewer combined unmitigated impacts than the three project housing strategies; and (2) present the fewest constraints to future implementation of future housing at those location, while still meeting the required RHNA obligation.

This section of the PEIR provides a tabular comparison of the project's three housing strategies, along with a detailed discussion and analysis of the No Project (Development Under the Adopted General Plan) Alternative and the SMUP Sustainable Mixed Use Places Alternative. Each major issue area included in the impact analysis for the project is given consideration in the alternatives analyses and is addressed below. Table 9-1 provides a summary of buildout statistics for each housing strategy along with the alternatives. Table 9-2 provides a summary of the significant project impacts compared to each alternative.

As required under Section 15126.6 (e) (2) of the CEQA Guidelines, an EIR must identify the environmentally superior alternative. Pursuant to the CEQA Guidelines, if the No Project Alternative is determined to be the most environmentally superior project, then another alternative among the alternatives evaluated must be identified as the environmentally superior project. Section 9.3 addresses the environmentally superior alternative.

**Table 9-1
Maximum Potential Residential and Commercial Buildout Comparison of HEU Housing Strategies and Alternatives**

Housing Site	HEU Strategy 1: Ready Made (RM)		HEU Strategy 2: Build Your Own (BYO)		HEU Strategy 3: Modified Mixed Use Places (MMUP)		No Project/Adopted General Plan Alternative		Sustainable Mixed Use Places (SMUP) Alternative	
	M.R. (du)	M.C. (sf)	M.R. (du)	M.C. (sf)	M.R. (du)	M.C. (sf)	M.R. (du)	M.C. (sf)	M.R. (du)	M.C. (sf)
Alt-2					309	281,255	237	281,255	309	281,255
Alt-3					291	209,207	0	191,800	291	209,207
Alt-4					186	0	13	0	186	0
Alt-5					338	0	54	0		
Alt-6					93	50,000	0	0		
Alt-7					416	450,900	342	450,900	416	450,900
C-1					187	126,300	0	450,900	187	126,300
C-2	317	0	317	0	317	0	89	0		
C-3	97	85,030					0	70,000	97	85,030
C-6					138	0	4	0	138	0
C-7	11	12,004					0	7,180		
L-1	126	90,967	126	90,967			65	90,967		
L-2	43	37,539					27	37,539		
L-4	57	0					6	0		
L-5	51	0					5	0		
L-6	164	0					16	0		
L-7			60	0	60	0	7	0		
NE-1			188	93,400	188	93,400	0	71,400	188	93,400
NE-3			300	0			0	0		
NE-4	378	175,000					0	175,000		
NE-7			181	77,400	181	77,400	0	67,400	181	77,400
O-2	96	83,808	96	83,808	96	83,808	10	0		
O-3					97	70,005	0	63,640		
O-4			80	57,618	80	57,618	9	0		
O-5	48	0	48	0			7	0		
O-6	38	0					4	30,100		
OE-1	46	40,333			46	40,333	43	30,100	46	40,333
OE-2			145	75,700			0	75,700		
OE-4	80	69,840			80	69,840	0	48,000	80	69,840
OE-5	243	186,300					183	159,030		
OE-7	135	0	90	64,820	135	0	0	78,400	135	0
OE-8			222	152,380			0	144,920		
CBHMG-1					23	0	0	10,060		
TOTAL	1,930	780,821	1,853	696,093	3,261	1,610,066	837	2,175,291	1,503,670	2,351

M.R. = Maximum Residential Buildout (DU = dwelling units); M.C. = Maximum Commercial Buildout (SF = square feet)

**Table 9-2
Matrix Comparison of the HEU Housing Strategies and Alternatives**

Environmental Issue Area	HEU Strategy 1: Ready Made	HEU Strategy 2: Build Your Own	HEU Strategy 3: Modified Mixed Use Places	No Project/Adopted General Plan Alternative	Sustainable Mixed Use Places Alternative
Aesthetics/Visual Resources					
VIS-1: Plan Consistency	LTS	LTS	LTS	SAME	SAME
VIS-2: Public Views	LTS	SU	SU	LESS	LESS
VIS-3: Community Character	SU	SU	SU	LESS	LESS
VIS-4: Scenic Resources	LTS	SU	SU	LESS	LESS
Air Quality					
AQ-1: Consistency with RAQS	SU	SU	SU	LESS	SAME
AQ-2: Criteria Pollutants	SM	SM	SM	LESS	LESS
AQ-3: Sensitive Receptors	LTS/SM	LTS/SM	LTS/SM	GREATER	LESS
Biological Resources					
BIO-1: Sensitive Wildlife Species	SM	SM	SM	SAME	LESS
BIO-2: Sensitive Vegetation Species	SM	SM	SM	SAME	LESS
BIO-3: Wetlands	SM	SM	SM	SAME	LESS
BIO-4: Wildlife Corridors	LTS	LTS	LTS	SAME	SAME
BIO-5: Habitat Conservation Planning	LTS	LTS	LTS	SAME	SAME
BIO-6: Policies and Ordinances Protecting Biological Resources	LTS	LTS	LTS	SAME	SAME
Cultural and Paleontological Resources					
CR-1: Historical Resources	SU	SU	SU	SAME	LESS
CR-2: Archaeological Resources	SM	SM	SM	SAME	LESS
CR-3: Paleontological Resources	SM	SM	SM	GREATER	LESS
CR-4: Human Remains	LTS	LTS	LTS	SAME	SAME
Geology and Soils					
GEO-1: Seismic Hazards	LTS	LTS	LTS	SAME	SAME
GEO-2: Soil Erosion	LTS	LTS	LTS	SAME	SAME
GEO-3 and GEO-4: Unstable and Expansive Soils	LTS	LTS	LTS	SAME	SAME
Greenhouse Gas Emissions					
GHG-1: GHG Emissions	SU	SU	SU	SAME	SAME
GHG-2: Consistency with GHG Plans, Policies, and Regulations	LTS	LTS	LTS	GREATER	SAME

**Table 9-2
Matrix Comparison of the HEU Housing Strategies and Alternatives**

Environmental Issue Area	HEU Strategy 1: Ready Made	HEU Strategy 2: Build Your Own	HEU Strategy 3: Modified Mixed Use Places	No Project/Adopted General Plan Alternative	Sustainable Mixed Use Places Alternative
Hazards and Hazardous Materials					
HAZ-1, HAZ-2, and HAZ-3 Hazardous Materials – Use, Transport, Disposal; Accidental Release; and Emissions near a School	LTS/SM	LTS/SM	LTS/SM	SAME	LESS
HAZ-4: Hazardous Materials - Sites	SM	SM	SM	SAME	SAME
HAZ-5: Emergency Response and Evacuation Plans	LTS	LTS	LTS	SAME	SAME
HAZ-6: Wildland Fires	LTS	LTS	LTS	SAME	SAME
Hydrology and Water Quality					
WQ-1 and WQ-6 Water Quality	LTS	LTS	LTS	SAME	SAME
WQ-2 Groundwater	LTS	LTS	LTS	SAME	SAME
WQ-3, WQ-4, and WQ-5 Drainage Patterns/Runoff	LTS	LTS	LTS	SAME	LESS
WQ-7, WQ-8, WQ-9, and WQ-10: Flooding/Inundation	LTS/SM	LTS/SM	LTS/SM	SAME	LESS
Land Use					
LU-1: Land Use Plans or Policies	LTS	LTS	LTS	GREATER	SAME
LU-2: State Planning Initiatives	LTS	LTS	LTS	GREATER	SAME
LU-3: Neighborhood Compatibility	LTS/SU	LTS/SU	LTS/SU	LESS	LESS
LU-4: Proximity to Agricultural Sites	LTS	LTS	LTS	SAME	LESS
LU-5: Exposure to Noise Levels	SM	SM	SM	SAME	SAME
Noise					
NO-1: Ambient Noise Levels	LTS	LTS	LTS	LESS	SAME
NO-2: On-Site Generated Noise	SM	SM	SM	SAME	SAME
NO-3: Temporary Noise	SM	LTS	SM	SAME	SAME
NO-4: Groundborne Noise and Vibration	SM	SM	SM	SAME	SAME
Population & Housing					
PH-1: Population Growth	LTS	LTS	LTS	SAME	SAME
PH-2: Displacement of People	LTS	LTS	LTS	SAME	SAME
Public Services and Recreation					
SERV-1a: Fire Service	LTS	LTS	LTS	SAME	SAME
SERV-1b: Police Service	LTS	LTS	LTS	SAME	SAME
SERV-1c: Schools	LTS	LTS	LTS	SAME	SAME
SERV-1d: Library Services	LTS	LTS	LTS	SAME	SAME
SERV-2 and SERV-3: Recreation	LTS	LTS	LTS	SAME	SAME

**Table 9-2
Matrix Comparison of the HEU Housing Strategies and Alternatives**

Environmental Issue Area	HEU Strategy 1: Ready Made	HEU Strategy 2: Build Your Own	HEU Strategy 3: Modified Mixed Use Places	No Project/Adopted General Plan Alternative	Sustainable Mixed Use Places Alternative
Transportation/Traffic					
TRF-1 and TRF-2: Circulation System Capacity and Operations	SU	SU	SU	LESS	SAME
TRF-3: Alternative Transportation	LTS	LTS	LTS	SAME	SAME
TRF-4 and TRF-5: Traffic Hazards and Access	LTS	LTS	LTS	SAME	SAME
Utilities and Service Systems					
UTIL-1a: Storm Water System	LTS	LTS	LTS	SAME	SAME
UTIL-1b and UTIL-3: Wastewater	LTS	LTS	LTS	SAME	SAME
UTIL-1c: Water System	LTS	LTS	LTS	SAME	SAME
UTIL-2: Water Supply	LTS	LTS	LTS	SAME	SAME
UTIL-4: Solid Waste Disposal	LTS	LTS	LTS	SAME	SAME
LTS = less than significant; SM = significant and mitigated; SU = significant and unavoidable					

9.2 Alternative Sites Considered but Rejected

This subsection of the EIR is provided consistent with CEQA Guidelines, which State that the EIR needs to examine in detail only a reasonable range of alternatives that the Lead Agency determines could feasibly attain most of the basic objectives of the project. Further, the EIR should identify any alternatives that were considered by the Lead Agency but were rejected and briefly explain the reasons underlying the Lead Agency's determination. Among factors used to eliminate alternatives from detailed consideration in the EIR is the failure to meet most of the basic project objectives or inability to avoid significant environmental effects (CEQA Guidelines 15126.6(c)).

According to the CEQA Guidelines (Section 15126.6) (f) (2) (A):

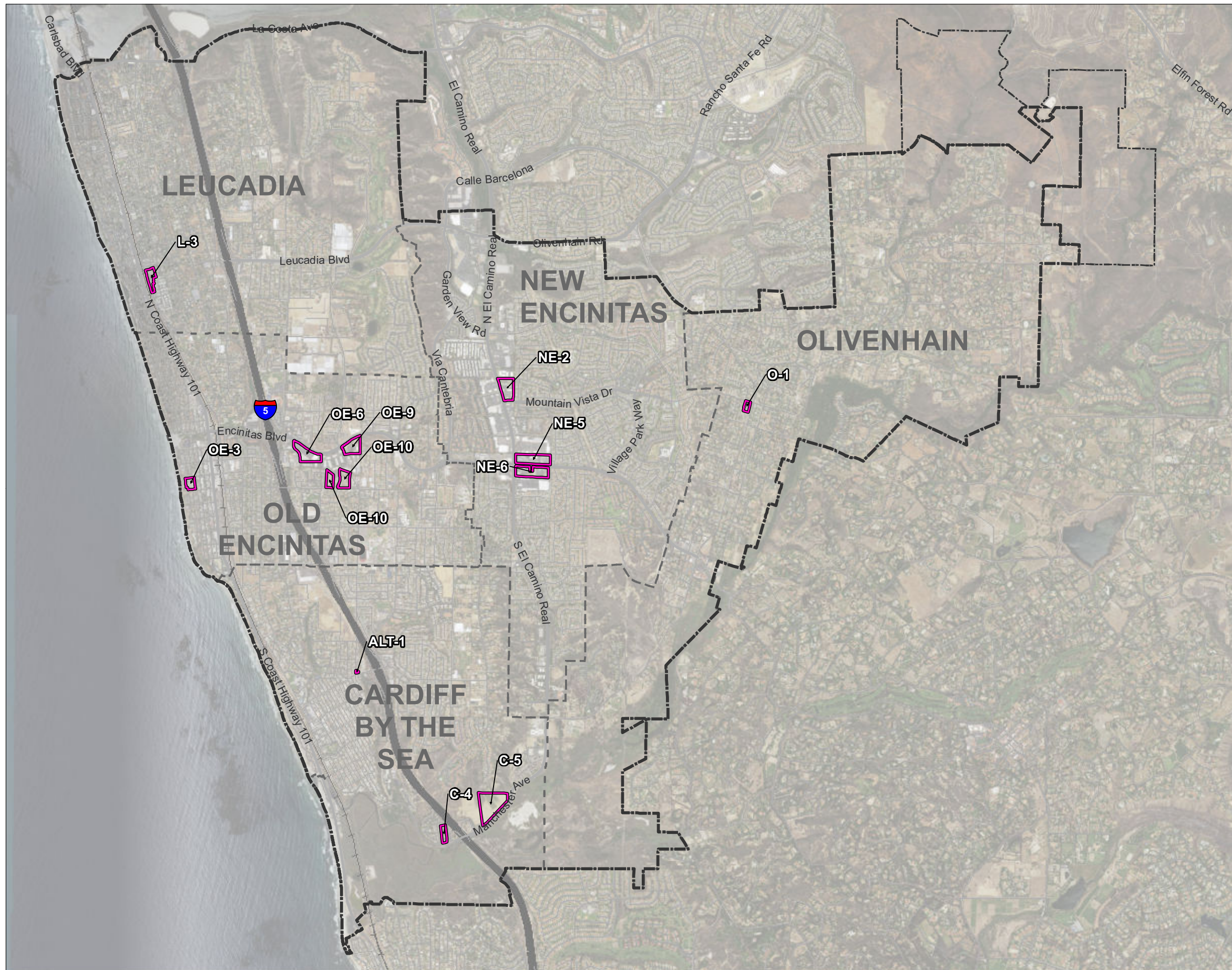
The key question and first step in (alternative location) analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR.





As discussed in Sections 3.2.2 and specifically in 3.2.2.3, the proposed housing sites were selected using siting principles and neighborhood prototypes developed to address the distribution for new housing throughout the City. Through the HEU process, the City is advancing more efficient land use strategies to encourage development that is more environmentally sensitive, economically viable, community-oriented, and/or sustainable. The proposed 33 housing sites represent viable placement of higher density and greater intensity dispersed throughout the City's unique communities. The list of sites included in the HEU generally avoids environmentally sensitive areas; minimizes impacts to other valued lands; and proposes more compact housing types built closer to activity centers or on major streets to make it easy to walk to activities and to support more efficient transit service.

Twelve additional sites were reviewed as potential candidate sites for inclusion in the three proposed housing strategies (Ready Made [RM], Build Your Own [BYO], and Modified Mixed use Places [MMUP]). The locations of these sites are shown in Figure 9-1. These alternative sites were considered but were rejected from further analysis for the reasons discussed below.

Housing Site C-4

Housing site C-4, located in Cardiff, is composed of four parcels with a total of approximately 2.2 acres. This site is adjacent to the San Elijo Lagoon Ecological Reserve, west of the freeway. Site C-4 is zoned R-11 (Single-family Residential, 11 dwelling units per acre [du/acre]), and would yield 24 units under the adopted General Plan. Existing structures on site C-4 include two single-family residences and a flooring company. Throughout different public engagement events, many people in the community expressed concerns about the visual and physical impacts that the site would have on the surrounding community. After analysis of site constraints, public feedback, and City Council direction, site C-4 was not considered as an alternative site.



-  City Limits
-  Sphere of Influence
-  Community Area Boundaries
-  Rejected Housing Sites

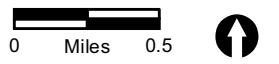


FIGURE 9-1
Rejected Housing Sites

Housing Site C-5

Housing site C-5 is located at 3111 Manchester Avenue in Cardiff. This site consists of one parcel with a net size of 15.6 acres. The study area for housing site C-5, also known as a portion of Strawberry Fields, is composed of field agriculture uses and one single-family residence located on a prime arterial roadway. The California Department of Transportation (Caltrans) has purchased the property for the construction of a park and ride facility with interest in preserving the remainder portion of the property for agricultural land use. Current zoning for site C-5 is RR-1 (Rural Residential, 1 du/acre), which would generate 15 units under the adopted General Plan. Throughout different public engagement events, many people in the community expressed concerns about the loss of prime agricultural lands – and converting the site’s agricultural operations to use that supports multi-family housing development. In addition to a preliminary assessment of the property public feedback, City Council direction, and potential Caltrans interests, housing site C-5 was not considered as an alternative site.

Housing Site L-3

Housing Site L-3 included a study area of 11 parcels with a total of approximately 5.15 acres. Site L-3 is located at 705-847 North Vulcan Avenue and is zoned as Mixed Use (NCRM-2), which allows for a wide range of commercial retailing, office, service activities, and residential uses up to 15 du/acre. This site currently has nine attached and detached homes with varied commercial services and activities. The residential yield for housing site L-3 under the adopted General Plan would be 77 units. Throughout different public engagement events, many people in the community expressed concerns about localized intersection impacts. Based on public feedback and City Council direction, housing site L-3 was not considered as an alternative site.

Housing Site NE-2

Housing site NE-2 is zoned General Commercial (GC) and located at 247-293 El Camino Real in New Encinitas. This 7.5 net acre site is located along a prime arterial roadway and consists of a neighborhood commercial center with retail shops, restaurants, medical offices, and car wash facilities. There are no existing residential units on site NE-2. Utilizing housing site NE-2 was considered for implementation of mixed use residential land use along a highly used roadway. However, throughout different public engagement events, many people in the community expressed concerns about the visual and physical impact that the site would have on the surrounding community. Based upon further analysis of the NE-2 study area, public feedback, and City Council direction, the alternative site was not considered as an alternative site.

Housing Site NE-5

Housing site NE-5 is composed of three parcels, totaling 8.4 acres from 1424-1552 Encinitas Boulevard. The site NE-5 is zoned GC and contains of retail shops, convenience stores, car dealerships, restaurants, fast food chains, and other amenities. Housing site NE-5 was constructed mostly in the late 1970s and is located along two, prime arterial roadways.

Throughout different public engagement events, many people in the community expressed concerns about localized intersection impacts, as well as visual and physical impacts that the site would have on the surrounding community. Based on public feedback and City Council direction, further analysis of the NE-5 study area, public feedback, and City Council direction, the alternative site was not considered as an alternative site.

Housing Site NE-6

New Encinitas housing site NE-6 is approximately 9.6 acres and is zoned GC, located between 127 South Camino Real and 1403-1513 Encinitas Boulevard. This site is adjacent to public transit and is composed of a car dealership, restaurants, offices, a vacant lot, and other retail stores. Utilizing housing site NE-6 was considered due to its prime location and opportunity to implement mixed use land use in an existing commercial area. Throughout different public engagement events, many people in the community expressed concerns about localized intersection impacts, as well other visual and physical impacts. After examining additional site constraints, analyzing public feedback, and receiving City Council direction, site NE-6 was excluded as an alternative site.

Housing Site O-1

Housing site O-1 is composed of three parcels located at 748-770 Rancho Santa Fe Road in Olivenhain. This 1.5-acre site is zoned RR-2 (Rural Residential, 2 du/acre) with structures including one existing single-family residence, a flower stand, and an office building. Throughout different public engagement events, many people in the community expressed concerns about the visual and physical impacts that the site would have on the surrounding community. Based on additional site assessment and analysis of the housing site O-1 study area, it was not included as an alternative site.

Housing Site OE-3

Housing site OE-3 is located at 608 Third Street in Old Encinitas and is approximately 2.5 net acres in size. This site is composed of a former elementary school and a historic school house built in the mid-1880s. The study area for housing site OE-3 is located along a local, two-lane roadway. The City purchased the property for potential civic, art, and cultural use. Therefore, the site was not included as an alternative site.

Housing Site OE-6

Old Encinitas housing site OE-6 consists of 11 parcels with a 7.9 net acre size, situated along 407-479 Encinitas Boulevard. This site is also known as the Encinitas Town and Country Shopping Center and is composed of a grocery store, convenience store, restaurants, and other local amenities. Site OE-6 is currently zoned as GC. Housing site OE-6 was initially considered as a housing opportunity site due to its location to a prime arterial roadway and potential for residential mixed use development. However, throughout different public engagement events, many people in the community expressed concerns about localized intersection impacts, as well other visual and physical impacts. Upon

further site assessment, public feedback, and City Council direction, this site was not considered as an alternative site.

Housing Site OE-9

Housing site OE-9 is located along 523-681 Encinitas Boulevard and is zoned as Business Park (BP) with a total of 5.4 net acres. Site OE-9 is composed of a private school, restaurant, and offices located along a prime arterial roadway. Site OE-9 was identified as an ideal site to increase density with implement efficient mixed use land use. Throughout different public engagement events, many people in the community expressed concerns about site ownership. Many of the tenant spaces are individually owned, which is a constraint to housing development (land accumulation would be difficult). In addition, some other community members identified visual and physical impacts concerns. Ultimately, based on public feedback and City Council direction, this site was rejected as an alternative site.

Housing Site OE-10

Housing site OE-10 includes seven parcels and is located between 544-560 Requeza Street and 655 and 675 Westlake Street. Site OE-10 is zoned as R-3 (Single-family Residential, 3 du/acre) on four lots and R-8 on three lots. The study area currently has four single-family residences and vacant land, and is located along a local, two-lane roadway. Utilizing housing site OE-10 was considered for its location and potential for higher density residential land use. However, throughout different public engagement events, many people in the community expressed concerns about visual and physical impacts. After further analysis of these parcels, public feedback, and City Council direction, site OE-10 was not considered as an alternative site.

Housing Site ALT-1

Alternative housing site ALT-1 is located at 1867 MacKinnon Avenue in Cardiff and is approximately 0.19 net acres. The ALT-1 study area is comprised of a former fire station constructed in the early 1960s. ALT-1 is currently zoned as Public/Semi-Public (P/SP) which allows for a wide range of community service related uses and medical complexes. ALT-1 was rejected as an alternative housing opportunity site because the yield from new housing units was not substantial.

9.3 Alternatives Fully Analyzed

The alternatives described below are analyzed in regard to each major issue identified in Chapter 4.0 of this PEIR (but in lesser detail than the project). A conclusion as to each alternative's impacts level of significance is made, where feasible. Where the magnitude of an alternative's impacts is clearly less than or greater than the impacts of the project, this is stated in the following analysis as well as in Table 9-2. The conclusion for each alternative also provides an overview of how the alternative meets, partially meets, or fails to meet the project objectives.

9.3.1 No Project (Development Under the Adopted General Plan) Alternative

The following discussion of the No Project (Development Under the Adopted Plan) Alternative (“No Project Alternative” hereafter) is based on the CEQA Guidelines Section 15126.6(e)(3)(A) which states:

When the project is the revision of an existing land use or regulatory plan, policy or ongoing operation, an alternative will be the continuation of the existing plan, policy or operation into the future. Typically this is a situation where other projects initiated under the existing plan will continue while the new plan is developed. Thus, the projected impacts of the proposed plan or alternative plans would be compared to the impacts that would occur under the existing plan.

Consistent with CEQA Guidelines Section 15126.6(e)(3)(A), the No Project Alternative represents the continued implementation of the adopted General Plan Land Use and zoning for the housing sites. The adopted General Plan land use plan is shown on Figure 9-2¹.

Compared to the HEU project, the No Project Alternative would have lower density of residential land use per acre and fewer overall square feet of commercial development. Under this alternative, the City is forecasted to have a total population of 74,268 people by the year 2035 (SANDAG 2015) and approximately 837 dwelling units would be permitted throughout the City. An issue-by-issue comparison of the No Project Alternative and the HEU is presented below.

¹Figure 9-2 shows the adopted General Plan land use outside of adopted specific plan areas in the City. Housing Site NE-1 is within the Encinitas Ranch Specific Plan area. The underlying land use for the housing site has been added to the figure; however, land use within adopted Specific Plans is not otherwise shown.

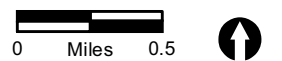
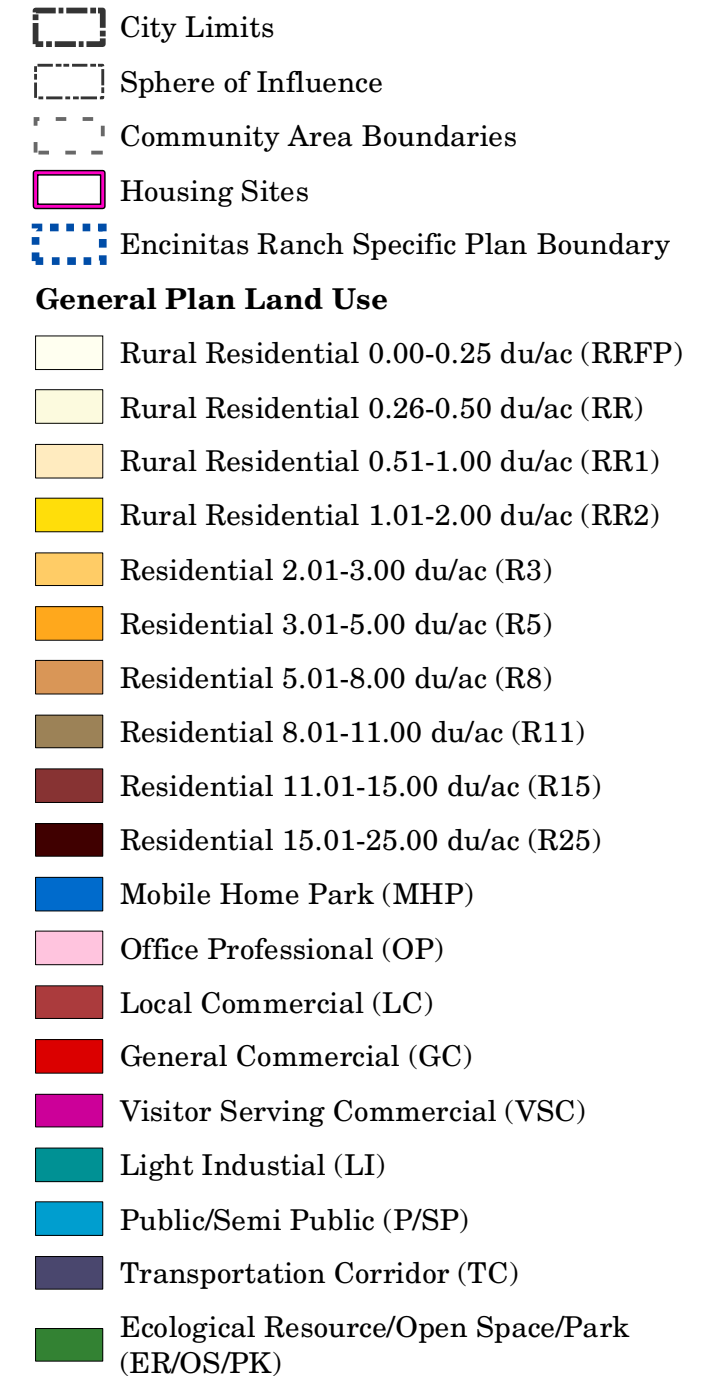
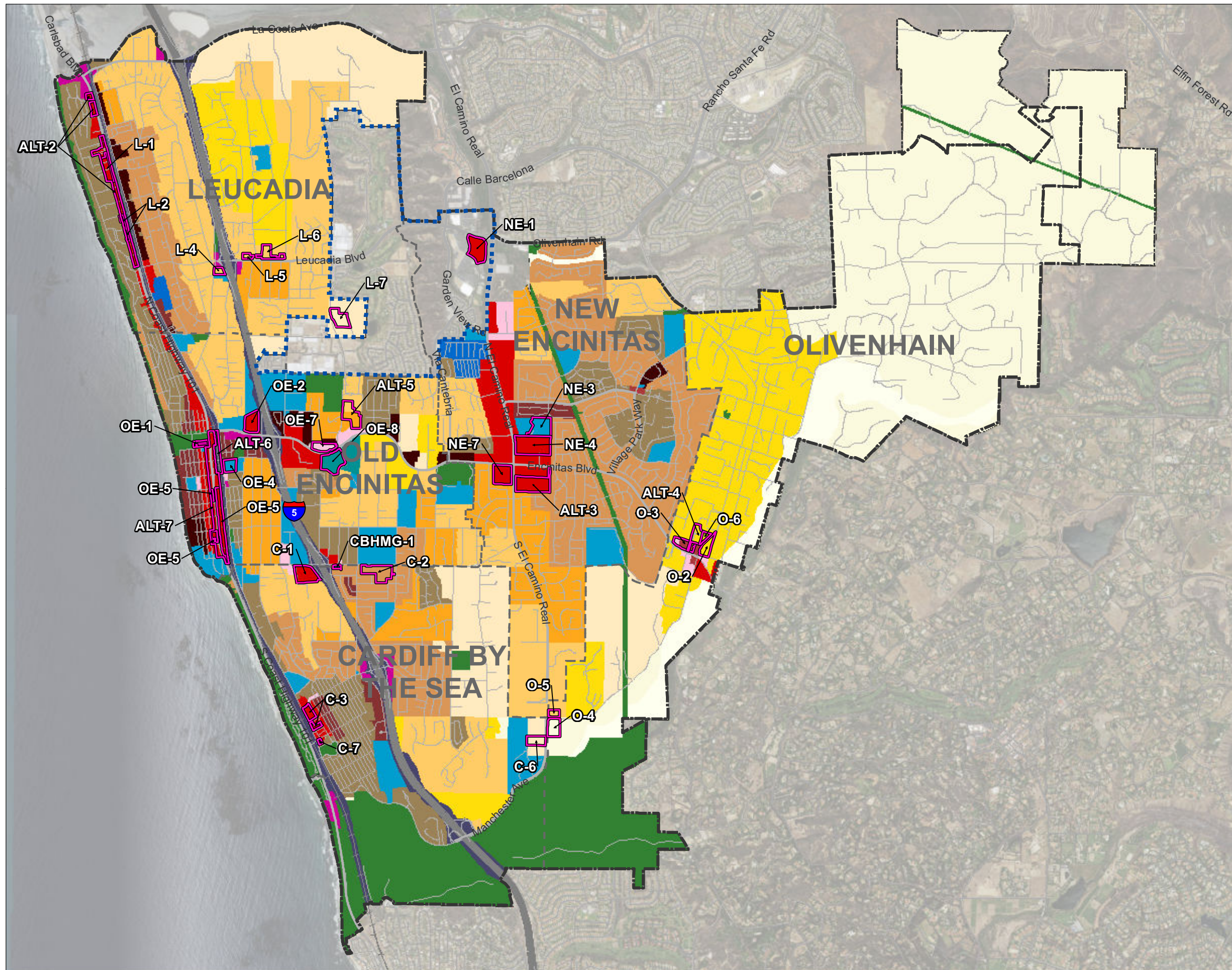


FIGURE 9-2
 No Project/Adopted
 General Plan Alternative

9.3.1.1 Description of the No Project (Development Under the Adopted General Plan) Alternative

Under the No Project Alternative, the development of the housing sites would proceed pursuant to the adopted City of Encinitas General Plan and zoning ordinance. Presently adopted land use designations and potential buildout yield for each housing site are summarized in Table 9-3. Total buildout potential for all 33 housing sites under the adopted General Plan and zoning would include 837 residential units and 2,175,291 square feet of commercial development. Presently, the housing sites contain only 101 existing residential units; therefore, buildout of the adopted General Plan has the potential to yield 736 additional units. Approximately 625,000 square feet of additional commercial development is anticipated on the housing sites under General Plan buildout, although redevelopment also could occur. Mixed use development is permitted under some of the City's current land use designations and zoning. Future projects consistent with the adopted General Plan would be discretionary because nearly all projects in the City are required to undergo design review. In addition to design review, subdivision maps, conditional use permits, and Master Design Review Permits (MDPs) may be required for the entitlement of future development consistent with the adopted General Plan. Only custom single-family detached housing outside of the Coastal Zone may be developed ministerially. [Development under the adopted General Plan would not be in compliance with State law with regards to providing adequate sites with high-density residential zoning. This alternative would not satisfy the project objectives stated in Chapter 3.0 (Project Description), which are restated above.

Housing Site	Parcel Area (Net)	Adopted General Plan Commercial/ Building Density Yield (square feet)	Adopted Plan Residential Yield	Adopted Land Use
C-1	9.35	122,000	0	GC
C-2	10.57	0	89	R-8
C-3	4.87	70,000	0	GC
C-6	4.60	0	4	RR-1
C-7	0.55	7,180	0	GC
L-1	5.21	90,967	65	GC
L-2	2.15	37,539	27	GC
L-4	1.89	0	6	R-3
L-5	1.69	0	5	R-3
L-6	5.45	0	16	R-3
L-7	7.50	0	7	RR-1
NE-1	10.20	71,400	0	GC
NE-3	10.00	0	0	P/SP
NE-4	18.90	175,000	0	GC
NE-7	9.05	67,400	0	GC
O-2	4.80	0	10	RR-2
O-3	4.87	63,640	0	LC and OP
O-4	4.00	0	9	RR

Table 9-3 No Project/Adopted General Plan Alternative Commercial/Residential Yield and Land Use/Zoning				
Housing Site	Parcel Area (Net)	Adopted General Plan Commercial/ Building Density Yield (square feet)	Adopted Plan Residential Yield	Adopted Land Use
O-5	1.60	0	7	R-3
O-6	1.50	0	4	RR-2
OE-1	2.31	30,100	43	GC
OE-2	7.25	75,700	0	GC
OE-4	4.00	48,000	0	P/SP
OE-5	12.17	159,030	183	GC
OE-7	4.50	78,400	0	OP
OE-8	11.09	144,920	0	GC
CBHMG-1	0.77	10,060	0	P/SP
ALT 2	10.19	281,255	145	GC
ALT 3	14.56	191,800	0	GC
ALT 4	2.19	0	4	RR-2
ALT 5	11.27	0	54	R-5
ALT 6	3.10	0	0	TC
ALT 7	8.85	450,900	159	GC
Totals	211.00	2,175,291	837	
GC = General Commercial LC = Local Commercial OP = Office Professional P/SP = Public /Semi-Public RR-X = Rural Residential R-X = Single-Family Residential (Units/Acre) TC = Transportation Corridor				

9.3.1.2 Environmental Analysis of the No Project (Development Under the Adopted Plan) Alternative

a. Aesthetics/Visual Resources

Issue 1: Plan Consistency

Impacts related to plan consistency from buildout under the No Project Alternative would be the same as under the HEU. Future development under the HEU would not conflict with any City policy or regulation protecting visual resources, including General Plan/LCP policies, Hillside/Inland Bluff Overlay Zone, or Scenic Visual Corridor Overlay Zone/Design Review Guidelines. Future development under the No Project Alternative would likewise be consistent with these adopted plans; impacts to plan consistency would be similar to the HEU.

Issue 2: Public Views

Impacts related to public views from the No Project Alternative would be less than development under the HEU. Under the HEU, development of housing site O-4 has the

potential to impact scenic views of the San Elijo Lagoon as viewed from the scenic roadways, due to potential construction of 57,618 additional square feet of commercial and 80 residential units. Nine residential units would be permitted on this site under the adopted plan and therefore, with the lesser intensity of development, impacts to public views would be less than the HEU.

Issue 3: Community Character

Impacts related to community character from future development under the No Project Alternative would be less than for development under the HEU. Under the HEU, development of housing sites L-7, O-4, and O-5 have the potential to impact community character because such development would be inconsistent with the existing rural environment that surrounds these sites. Specifically, the HEU would yield a total of 57,618 square feet of commercial and 188 residential units on sites L-7, O-4, and O-5. A total of 23 residential units could be constructed on these sites under the adopted plan and therefore, impacts to community character would be less than the HEU.

Issue 4: Scenic Resources

Impacts related to scenic resources from the No Project Alternative would be less than the HEU. Under HEU development of housing site O-4 has the potential to impact scenic resources because housing site O-4 contains a large stand of mature vegetation that is a visual extension of the natural open space associated with Escondido Creek and the San Elijo Lagoon to the south. The HEU would yield 57,618 square feet of commercial density and 80 residential units on this site, whereas only 9 residential units would be constructed under the adopted plan. Therefore, impacts to scenic resources would be less than the HEU.

b. Air Quality

Issue 1: Consistency with the Regional Air Quality Strategy

Impacts related to plan consistency from the No Project Alternative would be less than the HEU because existing regional air plans are based on the existing City forecasts. Future development under the HEU would increase growth in the City not currently accounted for resulting in a significant and unmitigated impact. Development under the No Project Alternative would be consistent with existing Regional Air Quality Strategy (RAQS), and impacts to consistency with RAQS would be less than the HEU.

Issue 2: Criteria Pollutants

Impacts related to criteria pollutants from the No Project Alternative would be less than under the HEU. Future development of certain housing sites consistent with the HEU could result in the emission of reactive organic gases (ROG) during construction, resulting in an exceedance of the significance thresholds, identified in Section 4.2.6. Future development under the HEU would be reviewed for consistency with this PEIR and compliance with the mitigation framework therein. Development under the adopted plan would result in construction-related emissions. However, development under the adopted

General Plan would not allow for the same intensity of development that could occur on the housing sites under the HEU. Therefore, impacts to criteria pollutants under the No Project Alternative would be less than the HEU.

Issue 3: Sensitive Receptors

Impacts related to sensitive receptors from the No Project Alternative would be greater than under the HEU. Development of the housing sites identified in Section 4.2.7 as being within 500 feet of Interstate 5 (I-5) and therefore subject to diesel particulate matter exposure also could be developed under the adopted plan. Future development under the HEU would be reviewed for consistency with this PEIR and compliance with the mitigation framework therein. Future development under the adopted plan would not be subject to the mitigation framework provided in this PEIR. Therefore, impacts to sensitive receptors under the No Project Alternative would be greater than under the HEU.

c. Biological Resources

Issue 1: Sensitive Species

Impacts related to sensitive species from the No Project Alternative would be the same as the HEU. Development within the HEU housing sites identified in Section 4.3.5 have potential to result in significant impacts to sensitive species under both the HEU and the No Project Alternative. Future development under both the HEU and No Project Alternative would be required to adhere to all applicable Federal, State, and local regulations regarding the protection of sensitive species. Furthermore, future development under the HEU would be reviewed for consistency with this PEIR and compliance with the mitigation framework therein. Likewise, under the adopted General Plan, future development on housing sites containing sensitive biological resources would implement similar mitigation measures to that proposed under the HEU, reducing these impacts to less than significant. Therefore, impacts to sensitive species under the No Project Alternative would be the same as the HEU.

Issue 2: Sensitive Vegetation

Impacts related to sensitive vegetation from the No Project Alternative would be the same as the HEU. Development under both the HEU and No Project Alternative would be required to adhere to all applicable Federal, State, and local regulations regarding the protection of sensitive vegetation communities. Future development under the HEU would be reviewed for consistency with this PEIR and compliance with the mitigation framework therein. Likewise, under the adopted General Plan, future development on housing sites containing sensitive biological resources would implement similar mitigation measures to that proposed under the HEU, reducing these impacts to less than significant. Therefore, impacts to sensitive vegetation under the No Project Alternative would be the same as the HEU.

Issue 3: Wetlands

Impacts related to wetlands from the No Project Alternative would be the same as the HEU. Development under both the HEU and No Project Alternative would be required to adhere to all applicable Federal, State, and local regulations regarding the protection of jurisdictional waters and wetlands. Development under the HEU would be reviewed for consistency with this PEIR and compliance with the mitigation framework therein. Likewise, under the adopted General Plan, future development on housing sites containing sensitive biological resources would implement similar mitigation measures to that proposed under the HEU, reducing these impacts to less than significant. Therefore, impacts to wetlands under the No Project Alternative would be the same as the HEU.

Issue 4: Wildlife Corridors

Impacts related to wildlife corridors from the No Project Alternative would be the same as the HEU. No significant, regional wildlife movement corridors exist within the vicinity of the housing sites. Future development within the housing sites would not have potential to result in significant impacts to wildlife movement corridors under either the HEU or No Project Alternative. Therefore, impacts to wildlife corridors under the No Project Alternative would be the same as the HEU.

Issue 5: Habitat Conservation Planning

Impacts related to habitat conservation planning from the No Project Alternative would be the same as the HEU. Future development within the City would be required to adhere to all applicable planning documents and regulations relating to an adopted Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP), or any other approved local, regional, or State HCP. Even absent the adoption of a formal Multiple Habitat Conservation Program (MHCP), under the adopted General Plan, future development on housing sites containing sensitive biological resources would implement similar mitigation measures to that proposed under the HEU, reducing these impacts to less than significant. Therefore, impacts to habitat conservation planning under the No Project Alternative would be the same as the HEU.

Issue 6: Policies and Ordinances Protecting Biological Resources

Impacts related existing local polices and ordinances protecting biological resources from the No Project Alternative would be the same as the HEU. Future development within the housing sites would be required to adhere to all existing applicable tree policies and ordinances protecting biological resources. Therefore, impacts to policies and ordinances protecting biological resources under the No Project Alternative would be the same as the HEU.

d. Cultural Resources

Issue 1: Historical Resources

Impacts related to historical resources from the No Project Alternative would be the same as the HEU. Future development within the housing sites could result in significant impacts to known or unknown resources under both the HEU and the No Project Alternative. Future development under the HEU would be reviewed for consistency with this PEIR and compliance with the mitigation framework therein. Likewise, under the adopted General Plan, future development on housing sites containing or having the potential to contain historical resources would implement similar mitigation measures to that proposed under the HEU, reducing these impacts to less than significant. However, at the program-level, under either the adopted plan or HEU, construction details are unknown and impacts would remain significant and unmitigated. Therefore, impacts to historical resources under the No Project Alternative would be the same as the HEU.

Issue 2: Archaeological Resources

Impacts related to archeological resources from the No Project Alternative would be the same as the HEU. Future development within the housing sites could result in significant impacts to unknown resources under both the HEU and the No Project Alternative. Future development under the HEU would be reviewed for consistency with this PEIR and compliance with the mitigation framework therein. Likewise, under the adopted General Plan, future development on housing sites containing or having the potential to contain archaeological resources would implement similar mitigation measures to that proposed under the HEU, reducing these impacts to less than significant. However, at the program-level, under either the adopted plan or HEU, construction details are unknown, and impacts would remain significant and unmitigated. Therefore, impacts to archeological resources under the No Project Alternative would be the same as the HEU.

Issue 3: Paleontological Resources

Impacts related to paleontological resources from the No Project Alternative would be greater than the HEU. Future development within the housing sites could result in significant impacts to unknown resources under both the HEU and the No Project Alternative. Future development under the HEU would be reviewed for consistency with this PEIR and compliance with the mitigation framework therein. Future development under the adopted plan would not be subject to the mitigation framework provided in this PEIR. Therefore, impacts to paleontological resources under the No Project Alternative would be greater than under the HEU.

Issue 4: Human Remains

Impacts related to human remains from the No Project Alternative would be the same as the HEU. There are no known burial sites or cemeteries within the vicinity of the City. Future development within the housing sites does not have potential to result in significant

impacts to human remains under either the HEU or No Project Alternative and impacts would be the same.

e. Geology and Soils

Issue 1: Seismic Hazards

Impacts related to seismic hazards from the No Project Alternative would be the same as the HEU. Future development within the housing sites would be required to comply with City General Plan policies, ordinances, the California Building Code (CBC), engineering standards and codes requiring future site-specific geotechnical reports. Regulatory compliance would reduce significant impacts to less than significant under either the HEU or No Project Alternative, and impacts would be the same.

Issue 2: Soil Erosion

Impacts related to soil erosion from the No Project Alternative would be the same as the HEU. Potential impacts related to soil erosion from future development within the housing sites would be less than significant under both the HEU and No Project Alternative. Future development within the housing sites would be required to comply with the City General Plan policies, CBC; City ordinances; engineering standards and codes; and the National Pollutant Discharge Elimination System (NPDES) requiring site-specific storm water pollution prevention plan (SWPPP) under both the HEU and No Project Alternative. Regulatory compliance would reduce significant impacts to less than significant under either the HEU or No Project Alternative, and impacts would be the same.

Issues 3-4: Unstable and Expansive Soils

Impacts related to unstable and expansive soils from the No Project Alternative would be the same as the HEU. Potential impacts related to unstable and expansive soils from future development within the housing sites would be less than significant under both the HEU and the adopted plan. Future development within the housing sites would be required to comply with the CBC; City of Encinitas Grading, Erosion, and Sediment Control Ordinance; the City's General Plan policies; and implement any recommendations described in a site-specific geotechnical investigation under both the HEU and No Project Alternative. Regulatory compliance would reduce significant impacts to less than significant under either the HEU or No Project Alternative and impacts would be the same.

f. Greenhouse Gas Emissions

Issue 1: GHG Emissions

Impacts related to GHG emissions from the No Project Alternative would be similar to the HEU. Buildout under the HEU would yield a greater amount of density and intensity of use, potentially resulting in greater GHG emissions. However, the HEU also provides for a more efficient land use pattern and would reduce vehicle miles travelled (VMT) compared to the No Project Alternative. Pursuant to Assembly Bill 32, all future development would

adhere to the California Energy Code requiring projects to show improvements in energy efficiency based on the relevant updated Code. The 2013 Code update achieves an average of 23 percent energy efficiency improvement over the 2008 Energy Code; and the 2016 update is anticipated to achieve an average 28 percent increase in energy efficiency over the 2013 Energy Code. However, at the program-level, under either the adopted General Plan or HEU, construction details are unknown, and impacts would remain significant and unmitigated. Therefore, impacts relative to GHG emissions under the No Project Alternative would be the same as the HEU.

Issue 2: Consistency with GHG Plans, Policies, and Regulations

Impacts related to consistency with GHG plans, policies, and regulations from the No Project Alternative would be greater than the HEU. The No Project Alternative would not comply with the CARB Scoping Plan and SCS. It would work against regional and statewide efforts to reduce GHG emissions because it would not work to reduce VMT throughout the City as compared to the HEU (see Table 4.6-8). Therefore, potential impacts from future development consistent with the HEU would be greater under the No Project Alternative.

g. Hazards and Hazardous Materials

Issues 1-3: Hazardous Materials – Use, Transport, Disposal; Accidental Release; and Emissions near a School

Impacts related to hazardous materials from the No Project Alternative would be the same as the HEU. Future development within the housing sites would be required to comply with Federal, State, County (Department of Environmental Health) and City regulations, as well as specific requirements of the San Diego Air Pollution Control District during both construction and operational phases of future projects. Additionally, any use of hazardous materials on-site would require preparation and adherence to a Hazardous Materials Business Plans under both the HEU and No Project Alternative. Future development under the HEU would be reviewed for consistency with this PEIR and compliance with the mitigation framework therein. Likewise, under the adopted General Plan, future development on housing sites containing or having the potential to contain hazardous materials would implement similar mitigation measures to that proposed under the HEU, reducing these impacts to less than significant. Therefore, impacts to hazardous materials under the No Project Alternative would be the same as the HEU.

Issue 4: Hazardous Materials – Sites

Impacts related to hazardous materials sites from the No Project Alternative would be the same as the HEU. No hazardous materials sites (pursuant to Government Code Section 65962.5) exist within the housing sites. Therefore, impacts associated with hazardous materials sites under the No Project Alternative and the HEU would be the same.

Issue 5: Emergency Response and Evacuation Plans

Impacts related to emergency response and evacuation plans from the No Project Alternative would be the same as the HEU. The City does not have an adopted emergency response plan. Additionally, applications for all future projects under both the HEU and No Project Alternative would be reviewed and approved by the City Fire Department prior to issuance of building permit. Therefore, impacts associated with emergency response plan or emergency evacuation plan under the No Project Alternative and the HEU would be the same.

Issue 6: Wildland Fires

Impacts related to wildland fires from the No Project Alternative would be the same as the HEU. Future development under both the HEU and No Project Alternative would be required to adhere to the State and local fire codes and City Design Guidelines to reduce risks related to wildland fire. Therefore, impacts associated with wildland fires under the No Project Alternative and the proposed HEU would be the same.

h. Hydrology and Water Quality***Issues 1 and 6: Water Quality***

Impacts related to water quality from the No Project Alternative would be the same as the HEU. Future development under both the HEU and No Project Alternative would be subject to Federal, State, and local regulations aimed at controlling water quality impacts. Therefore, impacts associated with water quality under the No Project Alternative and the proposed HEU would be the same.

Issue 2: Groundwater

Impacts related to groundwater from the No Project Alternative would be the same as the HEU. Future development under both the HEU and No Project Alternative would obtain potable water from either the San Dieguito Water District (serving Leucadia, Old Encinitas, Cardiff and portions of New Encinitas) or Olivenhain Municipal Water District (serving other areas of the City), neither of which uses groundwater for part of their potable supplies. Therefore, future development associated with buildout of the housing sites under the HEU or No Project Alternative would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge and impacts would be the same.

Issues 3-5: Drainage Pattern/Runoff

Impacts related to drainage pattern/runoff from the No Project Alternative would be the same as the HEU. Future development under both the HEU and No Project Alternative would be required to conform to applicable Federal, State, and City regulatory standards to effectively avoid and/or address potentially significant impacts. Therefore, impacts associated with drainage patterns/runoff under the No Project Alternative and the proposed HEU would be the same.

Issues 7-10: Flooding/Inundation

Impacts related to flooding/inundation from the No Project Alternative would be the same as the HEU. Future development of the housing sites identified in Section 4.8.1.1 could be impacted by dam or levee failure under the HEU or No Project Alternative. Future development under both the HEU and No Project Alternative would be required to conform to City General Plan policies related to flood hazards. Future development under the HEU would additionally be reviewed for consistency with this PEIR and compliance with the mitigation framework therein. Likewise, under the adopted General Plan, future development on housing sites containing or having the potential to contain flood hazard areas would implement similar mitigation measures to that proposed under the HEU, reducing these impacts to less than significant. Therefore, impacts associated with flooding/inundation under the No Project Alternative and the proposed HEU would be the same.

i. Land Use***Issue 1: Plan and Policy Consistency Impacts***

Impacts related to plan and policy consistency from the No Project Alternative would be greater than the HEU. As discussed under GHG, the No Project Alternative would not comply with the CARB Scoping Plan and SCS. It would work against regional and statewide efforts to reduce GHG emissions because it would not work to reduce VMT throughout the City as compared to the HEU. Future development under both the HEU and No Project Alternative would be reviewed for consistency with local plans and policies. However, impacts associated with plan and policy consistency would be greater under the No Project Alternative than the HEU.

Issue 2: Conflict with State Planning Initiatives

Impacts related to conflict with State planning initiatives from the No Project Alternative would be greater than the HEU. The City's adopted General Plan does not fully account for adequate sites for future high-density housing consistent with State Housing Element Law. Specifically, the purpose for the HEU is to provide additional housing throughout the City to allow the City to conform to its RHNA obligations. Future development under the No Project Alternative would not meet these goals and would not comply with State planning initiatives. Therefore, impacts associated with conflict with State planning initiatives under the No Project Alternative would be greater than the proposed HEU.

Issue 3: Neighborhood Compatibility Impacts (Associated with Significant Traffic, Noise, or Aesthetic Impacts)

With respect to traffic impacts associated with neighborhood compatibility, see Section 9.3.2.2(m), below.

With respect to noise impacts associated with neighborhood compatibility, see Section 9.3.2.2(j), below.

With respect to aesthetics impacts associated with neighborhood compatibility, see Section 9.3.2.2(a), above.

Issue 4: Result in Land Use Conflicts In Relation to the Proximity of Housing to Existing Agricultural Uses/Commodity Sites

Impacts related to housing in proximity to existing agriculture from the No Project Alternative would be the same as the HEU. As discussed in Section 4.9.8, most activities associated with greenhouse cultivation would be contained within a controlled environment and would not likely be a factor in creating incompatibility with surrounding land uses. Therefore, future development of these housing sites would not likely result in a significant impact associated with land use (agricultural use) conflicts. Therefore, impacts associated with housing in proximity to existing agriculture under the No Project Alternative would be the same as the HEU.

Issue 5: Result in Exposure of Persons to Noise Levels in Excess of Standards Established in the Local General Plan

Impacts related to exposure of persons to noise levels in excess of General Plan standards from the No Project Alternative would be the same as the HEU. Specifically, both the No Project Alternative and HEU could result in future development adjacent to roadways or freeways that would generate noise levels greater than 60 day-night equivalent level (L_{dn}). This is in excess of the City's normally acceptable exterior noise compatibility level. Additionally, development could occur on housing sites that are located adjacent to roadways or freeways that would generate noise levels greater than 70 L_{dn} . Future development under the HEU would be reviewed for consistency with this PEIR and compliance with the noise mitigation framework therein. Future development proposals under the adopted General Plan would be reviewed for General Plan noise - land use compatibility and would be conditioned appropriately. Implementation of mitigation and/or conditions would reduce significant impacts to less than significant under either the HEU or No Project Alternative, and impacts would be the same.

j. Noise

Issue 1: Ambient Noise Levels

Impacts related to ambient noise levels from the No Project Alternative would be less than the HEU. While an increase in ambient noise would occur under the HEU and adopted plan, vehicle traffic noise would be slightly greater under the HEU, specifically in those areas where the HEU would result in the improvement of underutilized lands to higher densities than contemplated under the adopted plan. Therefore, impacts to ambient noise levels under the No Project Alternative would be less than the HEU.

Impact 2: On-Site Generated Noise

Impacts related to on-site generated noise from the No Project Alternative would be the same as the HEU. Future development under both the HEU and No Project Alternative

could result in the exposure of sensitive receptors to noise through the placement of commercial and residential uses at close proximity. However, this would occur to a lesser extent under the No Project Alternative, wherein fewer sites would be designated for mixed use. Future development under both the No Project Alternative and the HEU would be required to adhere to City noise regulations aimed at controlling noise levels and reducing noise-related incompatibilities between land uses. Future development under the HEU additionally would be reviewed for consistency with this PEIR and compliance with the mitigation framework therein, which would help to minimize impacts associated with mixed land uses. Therefore, impacts associated with on-site generated noise under the No Project Alternative and the HEU would be the same.

Issue 3: Temporary Noise

Impacts related to temporary noise from the No Project Alternative would be the same as the HEU. Future development under both the HEU and No Project Alternative could result in temporary construction noise at the housing sites identified in Section 4.10.7.1 because potential housing sites are located less than 100 feet from their acoustic centers. However, the intensity of development is notably greater at housing sites under the HEU, which could result in a greater amount of construction noise over longer periods of time. All future development would be required to adhere to noise regulations in the City's Municipal Code. Additionally, future development under the HEU would be reviewed for consistency with this PEIR and compliance with the mitigation framework therein. Therefore, impacts associated with temporary noise under the No Project Alternative and the HEU would be the same.

Issue 4: Groundborne Noise and Vibration

Impacts related to groundborne noise and vibration from the No Project Alternative would be the same as the HEU. No operational components of the HEU include significant groundborne noise or vibration sources and no significant vibrations sources currently exist, or are planned, in the City. Similarly, no such impacts are anticipated under the adopted plan. Therefore, no significant groundborne noise or vibration impacts would occur with the operation of future projects implemented under the HEU or the No Project Alternative, and impacts would be the same.

k. Population and Housing

Issue 1: Population Growth

Impacts related to population growth from the No Project Alternative would be the same as the HEU. Future development under both the HEU and No Project Alternative would be required to adhere to the General Plan, provide required development impact fees, and comply with applicable development regulations to assure that the City is capable of supporting the growth. Therefore, impacts associated with population growth under the No Project Alternative and the proposed HEU would be the same.

Issue 2: Displacement of People

Impacts related to displacement of people from the No Project Alternative would be the same as the HEU. Future development under both the HEU and No Project Alternative do not anticipate the displacement of people during development/redevelopment. Therefore, impacts associated with displacement of people under the No Project Alternative and the proposed HEU would be the same.

I. Public Services and Recreation***Issue 1: Fire Rescue Service***

Impacts related to fire rescue service from the No Project Alternative would be the same as the HEU. The demand for fire rescue services under the No Project Alternative would be similar to or incrementally less than the HEU; however, future development under both the HEU and No Project Alternative would increase demand for fire rescue services over time. All future development would be required to assure that adequate levels of service are maintained. Therefore, impacts associated with fire rescue service under the No Project Alternative and the proposed HEU would be the same.

Issue 2: Police Service

Impacts related to police service from the No Project Alternative would be the same as the HEU. The demand for police service under the No Project Alternative would be similar to or incrementally less than the HEU; however, future development under both the HEU and No Project Alternative would increase demand for police service over time. All future development would be required to assure that adequate levels of service are maintained. Therefore, impacts associated with police service under the No Project Alternative and the proposed HEU would be the same.

Issue 3: Schools

Impacts related to schools from the No Project Alternative would be the same as the HEU. The demand for schools under the No Project Alternative would be similar to or incrementally less than the HEU; however, both the HEU and No Project Alternative would increase demand for schools over time. All new development would be subject to school impact fees in accordance with the provisions of SB 50. Therefore, impacts associated with schools under the No Project/Adopted Plan Alternative and the proposed HEU would be the same.

Issue 4: Library Services

Impacts related to library services from the No Project Alternative would be the same as the HEU. The demand for library services under the No Project Alternative would be similar to or incrementally less than the HEU. The County of San Diego would ultimately be responsible for improving the library system to accommodate growth within its service

area. Therefore, impacts associated with library services under the No Project Alternative and the proposed HEU would be the same.

Issue 5: Recreation

Impacts related to recreation from the No Project Alternative would be the same as the HEU. The demand for parks and recreational facilities under the No Project Alternative would be similar to or incrementally less than the HEU; however, the City has adequate facilities to serve the needs under either the adopted General Plan or HEU. Therefore, impacts associated with recreation under the No Project Alternative and the proposed HEU would be the same.

m. Transportation/Traffic

Issues 1 and 2: Circulation System Capacity and Operations

Impacts related to circulation system capacity and operations from the No Project Alternative would be less than the HEU. As identified in Section 4.13.1.2, multiple roadway (and freeway) segments and intersections throughout the City currently operate at substandard level of service (LOS) E or F. While increased traffic under the No Project Alternative would further degrade this condition, it would do so to a lesser degree than under the HEU. Future development under the HEU would result in greater impacts to roadway segments. This is primarily due to the HEU's improvement of underutilized lands to higher densities than contemplated under the adopted plan (see Table 6.1 in the Traffic Impact Study for a summary of buildout roadway LOS under the adopted plan compared to the housing strategies). Future development under the HEU would be reviewed for consistency with this PEIR and compliance with the mitigation framework therein. Implementation of mitigation measures (on a project basis) would likely reduce direct traffic impacts for development of housing sites under both the No Project Alternative and the HEU. The fee program mitigation would mitigate some cumulative impacts for future development under HEU; however, some cumulative impacts under both the HEU and No Project Alternative could remain significant and unmitigated. Regardless, impacts to circulation system capacity and operations under the No Project Alternative would be less than the proposed HEU.

Issue 3: Alternative Transportation

Impacts related to alternative transportation from the No Project Alternative would be the same as the HEU. Future development under both the HEU and No Project Alternative would be required to adhere to General Plan goals and policies regarding alternative transportation. Regulatory compliance would reduce significant impacts to less than significant under either the HEU or No Project Alternative, and impacts would be the same.

Issues 4 and 5: Traffic Hazards and Emergency Access

Impacts related to traffic hazards and emergency access from the No Project Alternative would be the same as the HEU. Specifically, future development would be required to adhere to road standards and design specifications intended to assure the safety of the City's roadway system. Regulatory compliance would reduce significant impacts to less than significant under either the HEU or No Project Alternative, and impacts would be the same.

n. Utilities and Service Systems***Issue 1a: Storm Drain System***

Impacts related to storm drain systems from the No Project Alternative would be the same as the HEU. Reduction of capacity of the existing storm drain system under the No Project Alternative would be similar to or incrementally less than the HEU. The City's Stormwater Manual requires all future development to implement project-specific measures to control and reduce storm water runoff, and at the program-level, no construction or expansion of storm water facilities would be required under either the adopted plan or HEU. Therefore, impacts to storm drain systems under the No Project Alternative and the HEU would be the same.

Issue 1b and 3: Wastewater

Impacts related to wastewater from the No Project Alternative would be the same as the HEU. Reduction of capacity of the existing wastewater treatment facilities under the No Project Alternative would be similar to or incrementally less than the HEU; however, development under both would be required to adhere to General Plan policies ensuring that the rate of growth does not exceed the capability of available services and facilities. Therefore, impacts associated with wastewater under the No Project Alternative and the proposed HEU would be the same.

Issue 1c: Water System

Impacts related to water system from the No Project Alternative would be the same as the HEU. Reduction of capacity of the existing system under the No Project Alternative would be similar to or incrementally less than the HEU; however, development under both plans would be required to adhere to General Plan policies ensuring that the rate of growth does not exceed the capability of available services and facilities. Therefore, impacts associated with water system under the No Project Alternative and the proposed HEU would be the same.

Issue 2: Water Supply

Impacts related to water supply from the No Project Alternative would be the same as the HEU. The demand for water under the No Project Alternative would be similar to or incrementally less than the HEU. Future development would be required to present service

letters from either San Dieguito Water District or Olivenhain Municipal Water District assuring that adequate water supplies would be available. Additionally, all future projects would be required to assure adequate measures are proposed to meet all water conservation requirements pursuant to the General Plan and City Municipal Code. Therefore, impacts associated with water supply under the No Project Alternative and the proposed HEU would be the same.

Issue 4: Solid Waste Disposal

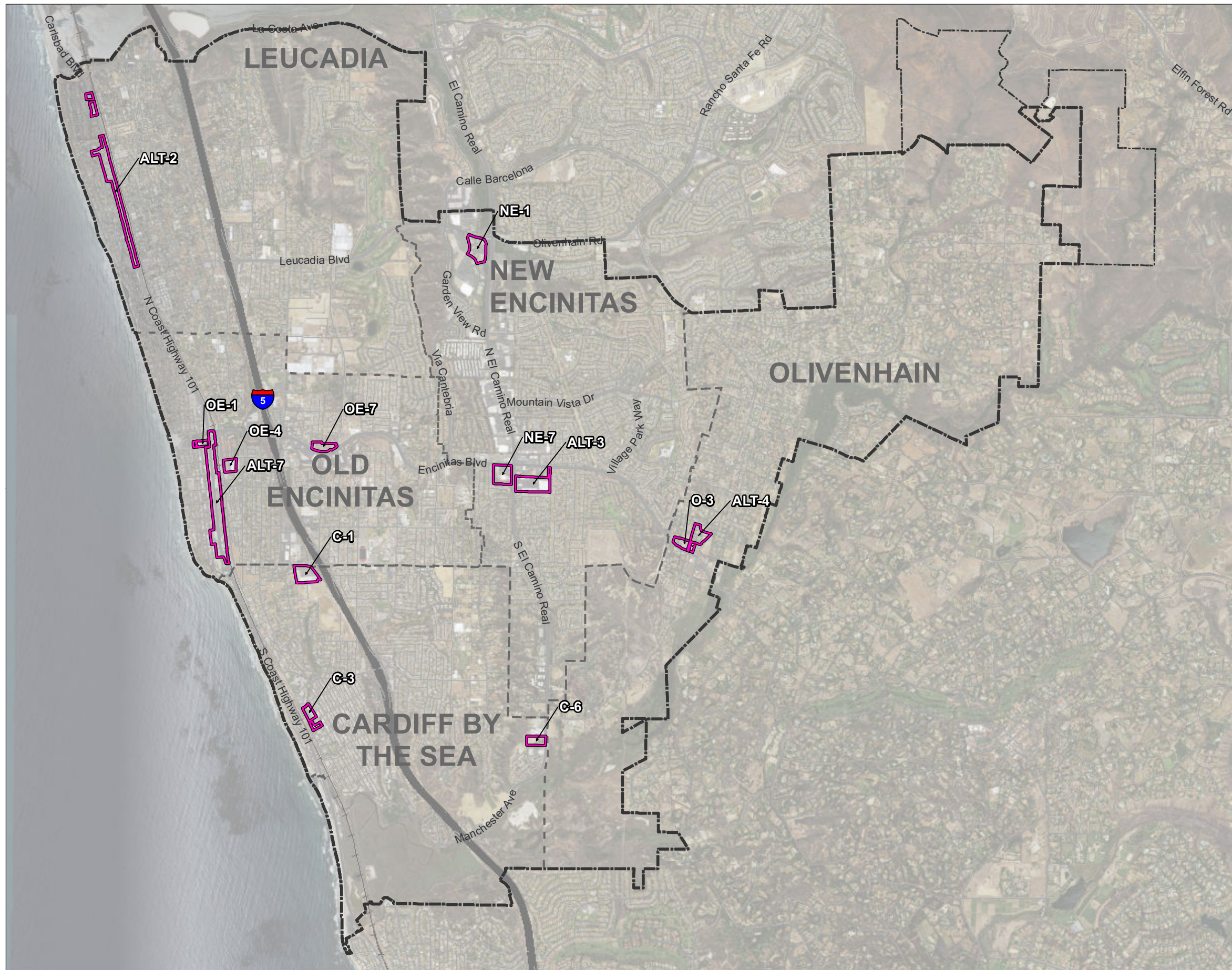
Impacts related to solid waste disposal from the No Project Alternative would be the same as the HEU. The demand for solid waste disposal under the No Project Alternative would be similar to or incrementally less than the HEU. Future development under both plans would be required to implement State and local recycling programs, and adhere to all General Plan and City Municipal Code section aimed at reducing waste and the diversion of recyclables from the City waste stream. Therefore, impacts associated with solid waste disposal under the No Project Alternative and the proposed HEU would be the same.





9.3.1.3 Conclusion Regarding the No Project (Development Under the Adopted Plan) Alternative

As shown in Table 9-2, the No Project Alternative would result in similar impacts associated with most environmental issues; however, due to the fewer number of trips generated by the adopted plan, impacts associated with traffic (mobile emissions, traffic-related noise) would be less than the HEU. Additionally under the adopted General Plan, less intense development would occur on a number of visually sensitive housing sites, wherein buildout under the No Project Alternative would result in fewer and reduced visual and community character related impacts, as compared to the HEU. The No Project Alternative would, however, result in several greater impacts than the HEU. Because future development under the No Project Alternative would not be subject to the mitigation framework in this PEIR impacts associated with sensitive receptors and paleontological resources would be greater. In addition, buildout of the adopted General Plan would not result in as efficient a land use pattern as the housing strategies under the HEU; therefore, GHG and land use impacts would be greater.

9.3.2 Sustainable Mixed Use Places Housing Strategy Alternative

The Sustainable Mixed Use Places Housing Strategy Alternative (SMUP Alternative) would meet the City's RHNA obligation, while providing adequate buffer to ensure compliance with the State law requiring no net loss of adequate sites. This alternative incorporates those housing sites that: (1) have fewer combined unmitigated impacts than the other three housing strategies; and (2) presents the fewest constraints to future implementation of future housing at those locations (refer to Figure 9-3 and Tables 9-4 and 9-5).



-  City Limits
-  Sphere of Influence
-  Community Area Boundaries
-  Housing Sites

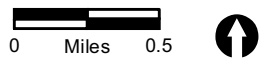


FIGURE 9-3
Sustainable Mixed Use Places
Housing Strategy Alternative

9.3.2.1 Description of the Sustainable Mixed Use Places Alternative

The SMUP Alternative represents an alternative to the HEU housing strategies addressed as the project in Chapter 3.0. It is an alternative that refines, but would have fewer impacts than the project's MMUP strategy, which was developed in response to substantial public input. This environmental analysis and the determination of substantial compliance for the draft Housing Plan by Housing and Community Development (HCD; Appendix A-1) occurred subsequent to the creation of the MMUP. With the benefit of the analysis and findings in this PEIR, along with the review of HCD, the SMUP Alternative was created. All sites that comprise the SMUP would meet the project's objectives. The differences and explanation for the changes from the MMUP housing strategy are as follows:

a. Sites Removed from the MMUP Housing Strategy in Development of the SMUP

C-2: The removal of housing site C-2 from the analysis reduced traffic trips.

CBHMG-1: The removal of housing site CBHMG-1 from the analysis reduced traffic trips. This site was also removed because the site is needed to remain in its existing condition for public utility purposes.

ALT-6: Housing site Alt-6 was removed from the analysis because is the site is physically constrained and is needed to service transportation-related purposes at the Encinitas Transit Center.

L-7: The removal of housing site L-7 from the analysis reduced multiple significant unmitigated aesthetic impacts.

O-4: The removal of housing site O-4 from the analysis reduced multiple significant unmitigated aesthetic impacts.

O-2: This site was removed the SMUP strategy because the lower population of Olivenhain would adequately be served by a single, new mixed activity center, which is accomplished with housing sites ALT-4 and O-3 on the opposite side of Rancho Santa Fe Road. Additionally, removing O-2 would allow Rancho Santa Fe Road to serve as a visual break between more urban development on the west side of the road to a rural character on the east side. The removal of housing site O-2 from the analysis also reduced impacts to cultural resources.

ALT-5: The removal of housing site Alt-5 from the analysis reduced traffic trips.

b. Sites Included in the SMUP

Leucadia

ALT-2: Housing site Alt-2 was included in the SMUP Alternative because this site provides an opportunity to strengthen the walkable Main Street Corridor character of Leucadia. Additionally, its inclusion helps meet project objectives by transitioning residential yields from moderate-income categories to lower income categories.

Old Encinitas

OE-1: Housing site OE-1 was included in the SMUP Alternative because it provides an opportunity to convert incompatible heavy commercial and light industrial land uses adjacent to Moonlight Beach and the downtown walkable Main Street Corridor with complementary and visitor serving uses. Visitor-serving uses are an important consideration adjacent to the beach in the Coastal Zone.

OE-4: Housing site OE-4 was included in the SMUP Alternative because it provides an opportunity for redevelopment of the underutilized City Hall sites into a mixed use place immediately adjacent to the Encinitas transit center.

ALT-7: Housing site Alt-7 was included in the SMUP Alternative because it provides an opportunity to strengthen the walkable Main Street Corridor character of Downtown Encinitas by converting underutilized sites to stitch together the whole of the downtown. Additionally, its inclusion helps meet project objectives by transitioning residential yields from moderate-income categories to lower income categories.

OE-7: Housing site OE-7 was included in the SMUP Alternative because while there is potential for biological resources, the site is isolated being fully surrounded by urbanization. Changing the land use from commercial to residential would reduce overall traffic trips and takes advantage of adjacent bus service.

Cardiff

C-3: Housing site C-3 was included in the SMUP Alternative because it would reduce traffic trips and strengthen the walkable character of the Cardiff Town Center/Village by accommodating mixed use. **C1:** Housing site C-1 was included in the SMUP Alternative because it provides an opportunity to complement the Encinitas Community Park by improving entrance aesthetics and allowing residents to walk to the park rather than drive from a distant site.

C-6: Housing site C-6 was included in the SMUP Alternative because it provides an opportunity to meet diverse housing needs.

New Encinitas

NE-7: Housing site NE-7 was included in the SMUP Alternative because it reduces traffic trips and provides a mixed use walkable place for New Encinitas. It also provides an opportunity to improve the aesthetics in the heart of the City's commercial corridor.

ALT-3: Housing site Alt-3 was included in the SMUP Alternative because it provides an opportunity to improve the aesthetics in the heart of the City's commercial corridor.

NE-1: Housing site NE-1 was included in the SMUP Alternative because it reduces traffic trips and provides a mixed use walkable place adjacent to existing shopping, park facility and planned cultural facility.

Olivenhain

ALT-4: Housing site Alt-4 was included in the SMUP Alternative because it focuses the change in land use to only one of the "four corners" of Olivenhain and supports the viability of the adjacent new mixed use site, O-3.

O-3: Housing site O-3 was included in the SMUP Alternative because it reduces traffic trips and provides a mixed use walkable place for Olivenhain.

An issue-by-issue comparison of the Reduced Constraints Alternative and the HEU housing strategies is presented below.

9.3.2.2 Environmental Analysis of the Sustainable Mixed Use Places Alternative

a. Aesthetics/Visual Resources

Issue 1: Plan Consistency

Impacts related to plan consistency from future development under the SMUP Alternative would be similar to those identified for the HEU housing strategies. Future development under both the Reduced Constraints Alternative and the HEU would not conflict with any City policy or regulation protecting visual resources, including General Plan/LCP policies, Hillside/Inland Bluff Overlay Zone, or Scenic Visual Corridor Overlay Zone/Design Review Guidelines. Therefore, impacts to plan consistency would be similar to the HEU housing strategies.

Issue 2: Public Views

Impacts related to public views from future development under the SMUP Alternative would be less than development under the HEU housing strategies. Housing strategies proposed under the HEU include development of housing site O-4, which has the potential to impact scenic views due to potential construction of 57,618 square feet of commercial and

80 residential units within the viewshed of a scenic highway. This housing site would not be included in the SMUP Alternative. Therefore, construction on this site would be limited to nine residential units as allowed under the adopted plan. Therefore, to public views would be less than the HEU.

Issue 3: Community Character

Impacts related to community character from future development under the SMUP Alternative would be less than development under the HEU housing strategies. Under the HEU development of housing sites L-7, O-4, and O-5 have the potential to impact community character because the development of 57,618 square feet of commercial uses and 188 residential units would be inconsistent with the existing rural environment that surrounds these sites. These housing sites would not be included in the SMUP Alternative. Therefore, to community character would be less than the HEU.

Issue 4: Scenic Resources

Impacts related to scenic resources from future development under SMUP Alternative would be less than the HEU housing strategies. Under HEU development of housing site O-4 has the potential to impact scenic resources because the development of 57,618 square feet of commercial density and 80 residential units would reduce the site's scenic views of the Escondido Creek and the San Elijo Lagoon. This housing site would not be included in the SMUP Alternative. Therefore, impacts to scenic resources would be less than the HEU.

b. Air Quality

Issue 1: Consistency with RAQS

Impacts related to plan consistency from future development under the SMUP Alternative would be same as the HEU housing strategies. Existing regional air plans are based on the existing City forecasts; future development under both the HEU and the SMUP Alternative would increase growth in the City not currently accounted for resulting in a significant and unavoidable impact at the program-level. Therefore, impacts to consistency with RAQS would be the same as the HEU.

Issue 2: Criteria Pollutants

Impacts related to criteria pollutants from the future development under SMUP Alternative would be less than under the HEU housing strategies. As discussed in Section 4.2.6, construction of certain housing sites could result in emissions of ROG that exceed the significance threshold of 250 pounds per day, as well as result in significant construction emissions. These sites include the following:

- Housing Strategy 1 (RM): NE-4, OE-5, C-2
- Housing Strategy 2 (BYO): OE-8, C-2, NE-3
- Housing Strategy 3 (MMUP): ALT-7, ALT-2, ALT-3, ALT-5, C-2, C-1, NE-1

The SMUP Alternative would only include the following sites: ALT-7, ALT-2, ALT-3, C-1, and NE-1. The future development under the HEU and the SMUP Alternative would be required to implement similar mitigation measures to reduce potentially significant impacts to criteria pollutants. However, future development under this alternative would result in the release of slightly less criteria pollutant compared to housing strategies 1 (RM) and 2 (BYO), and similar compared to housing strategy 3 (MMUP) due to the number of housing sites that could result in significant impacts would be developed to the degree allowed under the HEU. Overall, however, impacts to criteria pollutants under the SMUP Alternative would be less compared to the HEU.

Issue 3: Sensitive Receptors

Impacts related to sensitive receptors from future development under the SMUP Alternative would be less than HEU housing strategies. As discussed in Section 4.2.7, buildout of housing sites under the HEU would result in potentially significant impacts associated with diesel particulate matter due to their proximity to I-5. These sites include:

- Housing Strategy 1 (RM): L-4, L-5
- Housing Strategy 2 (BYO): OE-2
- Housing Strategy 3 (MMUP): CBHMG-1

None of these housing sites would be included in the SMUP Alternative. Therefore, impacts to sensitive receptors under the SMUP Alternative would be less than the HEU.

c. Biological Resources

Issue 1: Sensitive Species

Impacts related to sensitive species from future development under the SMUP Alternative would be less than the HEU housing strategies. As discussed in Section 4.3.5, buildout of housing sites under the HEU would result in impacts to sensitive plants and wildlife due to grading and other land development activities. These sites include:

- Housing Strategy 1 (RM): L-4, O-2, O-5, O-6, OE-1, OE-2, OE-7, C-2, L-5, NE-4
- Housing Strategy 2 (BYO): L-7, NE-3, O-2, O-4, O-5, OE-2, OE-7, NE-1, C-2, NE-7
- Housing Strategy 3 (MMUP): C-6, L-7, O-2, O-4, OE-1, OE-7, NE-1, C-2, NE-7, O-3

The SMUP Alternative would only include the following sites: OE-1, OE-7, NE-1, C-6, NE-7, and O-3. Future development under all three housing strategies and the SMUP Alternative would be required to adhere to applicable Federal, State, and local regulations regarding the protection of sensitive species and implement similar mitigation measures to reduce these potentially significant impacts to sensitive species. However, development under this alternative would result in slightly fewer impacts to sensitive species compared to any of the three strategies because fewer of the housing sites with the potential for sensitive species are included in this alternative. Therefore, impacts to sensitive species under the SMUP Alternative would be less than the HEU.

Issue 2: Sensitive Vegetation

Impacts related to sensitive vegetation from future development under the SMUP Alternative would be less than the HEU housing strategies. As discussed in Section 4.3.6, buildout of housing sites under the HEU would result in impacts to sensitive vegetation communities through vegetation removal. These sites include:

- Housing Strategy 1 (RM): L-4, O-2, O-5, O-6, OE-1, OE-7
- Housing Strategy 2 (BYO): L-7, NE-3, O-2, O-4, O-5, OE-2, OE-7
- Housing Strategy 3 (MMUP): ALT-4, ALT-5, C-6, L-7, O-2, O-4, OE-1, OE 7

The SMUP Alternative would only include the following sites: OE-1, OE-7, Alt-4, and C-6. Future development under all three housing strategies and the SMUP Alternative would be required to adhere to applicable Federal, State, and local regulations regarding the protection of sensitive vegetation communities and implement similar mitigation measures to reduce potentially significant impacts to sensitive vegetation. However, development under this alternative would result in slightly fewer impacts to sensitive species compared to any of the three strategies because fewer of the housing sites with the potential for sensitive species are included in this alternative. Therefore, impacts to sensitive species under the SMUP Alternative would be less than the HEU.

Issue 3: Wetlands

Impacts related to wetlands from future development under the SMUP Alternative would be less than the HEU housing strategies. As discussed in Section 4.3.7, buildout of housing sites under the HEU would result in impacts to impact jurisdictional waters or wetlands through such activities through vegetation removal and grading activities associated with development. These sites include:

- Housing Strategy 1 (RM): L-4, O-2, O-5, O-6, OE-1, OE-7
- Housing Strategy 2 (BYO): L-7, NE-1, NE-3, O-2, O-4, O-5, OE-2, OE-7
- Housing Strategy 3 (MMUP): ALT-4, ALT-5, ALT-7, C-6, L-7, NE-1, O-2, O-4, OE-1, OE-7

The SMUP Alternative would only include the following sites: OE-1, OE-7, Alt-4, Alt-7, NE-1, and C-6. Future development under all three housing strategies and the SMUP Alternative would be required to adhere to applicable Federal, State, and local regulations regarding the protection of sensitive vegetation communities and implement similar mitigation measures to reduce potentially significant impacts to wetlands. However, development under this alternative would result in slightly fewer impacts to sensitive species compared to any of the three strategies because fewer of the housing sites with the potential for sensitive species are included in this alternative. Therefore, impacts to historical resources under the SMUP Alternative would be less than the HEU.

Issue 4: Wildlife Corridors

Impacts related to wildlife corridors from future development under the SMUP Alternative would be the same as the HEU housing strategies. No significant, regional wildlife movement corridors exist within the vicinity of the housing sites. Future development within the housing sites would not result in significant impacts to wildlife movement corridors under either the HEU or SMUP Alternative. Therefore, impacts to wildlife corridors under the No Project Alternative would be the same as the HEU.

Issue 5: Habitat Conservation Planning

Impacts related to habitat conservation planning from future development under the SMUP Alternative would be the same as the HEU housing strategies. Future development within the City, under any plan, would be required to adhere to all applicable planning documents and regulations relating to an adopted HCP, NCCP, or any other approved local, regional, or State HCP. Even absent the adoption of a formal MHCP, similar mitigation measures to that proposed for future development under the HEU would be required under SMUP Alternative reducing these impacts to less than significant. Therefore, impacts to habitat conservation planning under the SMUP Alternative would be the same as the HEU.

Issue 6: Policies and Ordinances Protecting Biological Resources

Impacts related existing local polices and ordinances protecting biological resources from the SMUP Alternative would be the same as the HEU. Future development within the housing sites would be required to adhere to all existing applicable tree policies and ordinances protecting biological resources. Therefore, impacts to policies and ordinances protecting biological resources under the SMUP Alternative would be the same as the HEU.

d. Cultural and Paleontological Resources***Issue 1: Historical Resources***

Impacts related to historical resources from future development under the SMUP Alternative would be less than the HEU housing strategies. As discussed in Section 4.4.5, buildout of housing sites under the HEU could result in impacts known historical resources including historic structures and/or buildings or structures greater than 50 years old. These sites include:

- Housing Strategy 1 (RM): L-1, OE-1, OE-5, C-2, C-3, C-7, L-1, L-2, L-5, L-6, NE-4, O-5, OE-4, OE-7
- Housing Strategy 2 (BYO): L-1, C-2, NE-1, NE-3, NE-7, O-5, OE-2, OE-7, OE-8
- Housing Strategy 3 (MMUP): ALT-2, ALT-7, OE-1, ALT-3, ALT-4, ALT-5, ALT-6, C-1, C-2, C-6, NE-1, NE-7, O-3, OE-4, OE-7, CBHMG-1

The SMUP Alternative would include the following sites that have the potential for significant impacts to historical resources: OE-1, OE-4, OE-7, C-1, C-3, C-6, NE-1, NE-7, ALT-2, ALT-3, ALT-4, ALT-7, and O-3. Future development under all three housing

strategies and the SMUP Alternative would be required to adhere to applicable Federal, State, and local regulations regarding the protection of sensitive resources and implement similar mitigation measures to reduce significant impacts to historical resources. Similar to the HEU, impacts associated with these sites would remain significant and unavoidable at the program-level. However, development under this alternative would result in slightly fewer impacts to sensitive resources compared to any of the three strategies because fewer of the housing sites with the potential for sensitive species are included in this alternative. Therefore, impacts to historical resources under the SMUP Alternative would be less than the HEU.

Issue 2: Archaeological Resources

Impacts related to archeological resources from future development under the SMUP Alternative would be less than the HEU housing strategies. As discussed in Section 4.4.6, ground-disturbing activities such as grading or excavation within housing sites under the HEU could result in impacts to undiscovered subsurface archaeological resources. These sites include:

- Housing Strategy 1 (RM): L-4, O-2, O-5, O-6, OE-1, OE-7
- Housing Strategy 2 (BYO): L-7, NE-3, O-2, O-4, O-5, OE-2, OE-7
- Housing Strategy 3 (MMUP): ALT-4, ALT-5, C-6, L-7, O-2, O-4, OE-1, OE-7

The SMUP Alternative would only include the following sites that have the potential for significant impacts to archeological resources: OE-1, OE-7, ALT-4, and C-6. Future development under all three housing strategies and SMUP Alternative would be required to adhere to applicable Federal, State, and local regulations regarding the protection of sensitive resources and implement similar mitigation measures to reduce significant impacts to historical resources. Similar to the HEU, impacts associated with these sites would remain significant and unavoidable at the program-level. However, development under this alternative would result in slightly fewer impacts to sensitive resources compared to any of the three strategies because fewer of the housing sites with the potential for sensitive species are included in this alternative. Therefore, impacts to archeological resources under the SMUP Alternative would be less than the HEU.

Issue 3: Paleontological Resources

Impacts related to paleontological resources from future development under the SMUP Alternative would be less than the HEU housing strategies. As discussed in Section 4.4.7, grading housing sites with potential to contain undisturbed deposits of Torrey Sandstone and/or the Del Mar formation would have the potential to significantly impact subsurface paleontological resources. These sites include:

- Housing Strategy 1 (RM): NE-4, O-2, O-5, O-6, OE-1, OE-7
- Housing Strategy 2 (BYO): L-7, NE-3, NE-7, O-2, O-4, O-5, OE-2, OE-7, OE-8
- Housing Strategy 3 (MMUP): ALT-3, ALT-4, ALT-5, ALT-6, ALT-7, C-6, L-7, NE-7, O-2, O-3, O-4, O-5, OE-1, OE-7

The SMUP Alternative would include the following sites that have the potential for significant impacts to paleontological impacts: OE-1, OE-7, NE-7, ALT-3, ALT-4, ALT-7, O-3 and C-6. Future development under all three housing strategies and the SMUP Alternative would be required to adhere to applicable Federal, State, and local regulations regarding the protection of sensitive resources and implement similar mitigation measures to reduce significant impacts to historical resources. However, development under this alternative would result in slightly fewer impacts to sensitive resources compared to any of the three strategies because fewer of the housing sites with the potential for sensitive species are included in this alternative. Therefore, impacts to paleontological resources under the SMUP Alternative would be less than the HEU.

Issue 4: Human Remains

Impacts related to human remains from future development under the SMUP Alternative would be the same as the HEU housing strategies. There are no known burial sites or cemeteries within the vicinity of the City. Future development within the housing sites does not have potential to result in significant impacts to human remains under either the HEU or the SMUP Alternative and impacts would be the same.

e. Geology and Soils

Issue 1: Seismic Hazards

Impacts related to seismic hazards from future development under the SMUP Alternative would be the same as the HEU housing strategies. As discussed in Section 4.5.4, housing sites that contain steep slopes include: NE-3, NE-7, OE-4 and OE-7. The SMUP Alternative would include the following of these sites: NE-7, OE-4, and OE-7. Additional seismic hazards could occur within additional housing sites due to ground movement and structural damage. Future development under any plan would be required to comply with City General Plan policies, ordinances, the CBC, engineering standards and codes requiring future site-specific geotechnical reports. Regulatory compliance would reduce significant impacts to less than significant under either the HEU or SMUP Alternative and impacts would be the same.

Issue 2: Soil Erosion

Impacts related to soil erosion from future development under the SMUP Alternative would be the same as the HEU housing strategies. Future development under any plan would be required to comply with the City General Plan policies, CBC; City ordinances; engineering standards and codes; and the NPDES requiring site-specific SWPPP. Regulatory compliance would reduce significant impacts to less than significant under either the HEU or SMUP Alternative and impacts would be the same.

Issues 3-4: Unstable and Expansive Soils

Impacts related to unstable and expansive soils from future development under the SMUP Alternative would be the same as the HEU housing strategies. Future development under

any plan would be required to comply with the CBC; City of Encinitas Grading, Erosion, and Sediment Control Ordinance; the City's General Plan policies; and implement any recommendations described in a site-specific geotechnical investigation. Regulatory compliance would reduce significant impacts to less than significant under either the HEU or SMUP Alternative and impacts would be the same.

f. Greenhouse Gas Emissions

Issue 1: GHG Emissions

Impacts related to GHG emissions from future development under the SMUP Alternative would be the same as the HEU housing strategies. Buildout under the three HEU housing strategies and the SMUP Alternative would yield similar amounts of density and intensity of use, resulting in higher GHG emissions than the existing condition. Future development under all three housing strategies and the SMUP Alternative would implement similar mitigation measures to reduce GHG emissions. However, at the program-level, under either plan, construction details are unknown and impacts would remain significant and unmitigated. Therefore, impacts to GHG emission under the SMUP Alternative would be the same as the HEU.

Issue 2: Consistency with GHG Plans, Policies, and Regulations

Impacts related to consistency with GHG plans, policies and regulations from future development under the SMUP Alternative would be the same as the HEU housing strategies. Future development under all three housing strategies and the SMUP Alternative would be required to comply with all State and local regulations. Neither the HEU nor the SMUP Alternative would conflict with GHG plans, policies and regulations and impacts would be the same.

g. Hazards and Hazardous Materials

Issues 1-3: Hazardous Materials – Use, Transport, Disposal; Accidental Release; and Emissions near a School

Impacts related to hazardous materials from future development under the SMUP Alternative would be less than the HEU housing strategies. As discussed in Section 4.7.5, future development of the housing sites would not result in the routine transport, use, or disposal of substantial quantities of hazardous materials. Development could however, result in accidental release of hazardous materials due to development on or near known and potentially known hazardous materials sites. These sites include:

- Housing Strategy 1 (RM): C-2, C-3, C-7, L-1, L-2, L-4, L-5, L-6, NE-4, OE-1, OE4, OE-5
- Housing Strategy 2 (BYO): C-2, L-1, NE-3, NE-7, OE-2, OE-7
- Housing Strategy 3 (MMUP): ALT-2, ALT-3, ALT-5, ALT-6, ALT-7, C-1, C-2, CBHMG-3, NE-7, OE-1, OE-4, OE-7

The SMUP Alternative would include the following sites that have the potential for significant impacts associated with hazardous materials: C-1, C-3, OE-1, OE-4, OE-7, NE-7, ALT-2, ALT-3, and ALT-7. Future development under all three housing strategies and the SMUP Alternative would be required to adhere to applicable Federal, State, and local regulations regarding the protection of sensitive resources and implement similar mitigation measures to reduce significant impacts to historical resources. However, development under this alternative would result in slightly fewer impacts to hazardous materials compared to housing strategies 1 (RM) and 3 (MMUP), but similar impacts to housing strategy 2 (BYO). Overall, however, impacts to hazardous materials under the SMUP Alternative would be less than the HEU.

Issue 4: Hazardous Materials – Sites

Impacts related to hazardous materials sites from future development under the SMUP Alternative would be the same as the HEU housing strategies. No hazardous materials sites (pursuant to Government Code Section 65962.5) exist within any of the housing sites. Therefore, impacts associated with hazardous materials sites under the SMUP Alternative and the HEU would be the same.

Issue 5: Emergency Response and Evacuation Plans

Impacts related to emergency response and evacuation plans from future development under the SMUP Alternative would be the same as the HEU housing strategies. The City does not have an adopted emergency response plan. Additionally, applications for all future projects under both the HEU and SMUP Alternative would be reviewed and approved by the City Fire Department prior to issuance of building permit. Therefore, impacts associated with emergency response plan or emergency evacuation plan under the SMUP Alternative and the HEU would be the same.

Issue 6: Wildland Fires

Impacts related to wildland sites from the future development under SMUP Alternative would be the same as the HEU housing strategies. As discussed in Section 4.7.8, housing sites C-6, O-4, and O-5 are located near open space associated with the San Elijo Lagoon and are within the City's designated VHFHSZ. Only one of these housing sites would be included in the SMUP Alternative (C-6); however, future development under all three housing strategies and the SMUP Alternative would be required to adhere to the State and local fire codes and City Design Guidelines to reduce risks related to wildland fire. Therefore, impacts associated with wildland fires under the SMUP Alternative and the proposed HEU would be the same.

h. Hydrology and Water Quality

Issues 1 and 6: Water Quality

Impacts related to water quality from the future development under the SMUP Alternative would be the same as the HEU housing strategies Future development under all three

housing strategies and the SMUP Alternative would be subject to Federal, State, and local regulations aimed at controlling water quality impacts. Therefore, impacts associated with water quality under the SMUP Alternative and the proposed HEU would be the same.

Issue 2: Groundwater

Impacts related to groundwater from the future development under the SMUP would be the same as the HEU housing strategies. Future development under all three housing strategies and the SMUP Alternative would obtain potable water from either of the water districts serving the City, neither of which uses groundwater for part of their potable supplies. Therefore, future development associated with buildout of the housing sites under the HEU or SMUP Alternative would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge and impacts would be the same.

Issues 3-5: Drainage Pattern/Runoff

Impacts related to drainage pattern/runoff from the future development under the SMUP Alternative would be less than the HEU housing strategies. Generally, increased development results in increased impervious surfaces that could alter drainage patterns and increase runoff. The physical development of undeveloped sites could result in impacts greater than the redevelopment of existing built conditions. As discussed in Section 4.8.6, several sites included in the HEU housing strategies are presently undeveloped. These sites include: ALT-4, ALT-5, C-6, L-4, L-7, NE-3, O-2, O-4, O-5, O-6, OE-1, OE-2, and OE-7. Only four of these sites are included in the SMUP Alternative. Future development under all three housing strategies and the SMUP Alternative would be required to adhere to applicable Federal, State, and local regulations including future design measures to reduce impacts associated with hydrology and increased runoff. However, development under this alternative would result in slightly fewer impacts to drainage patterns and runoff compared to the HEU because it includes fewer undeveloped sites. Therefore, impacts to drainage patterns/runoff under the SMUP Alternative would be less than the HEU.

Issues 7-10: Flooding/Inundation

Impacts related to flooding/inundation from the future development under the SMUP Alternative would be less than the HEU housing strategies. As discussed in Section 4.8.8, development could result in flood hazards and dam inundation to those sites that occur within special 10-year and 100-year flood problem areas and/or located within a dam inundation area. These sites include:

- Housing Strategy 1 (RM): L-1, L-2; O-2
- Housing Strategy 2 (BYO): L-1, OE-2, O-2, O-4
- Housing Strategy 3 (MMUP): ALT-2, ALT-6, ALT-7, C-6, O-2 O-4

The SMUP Alternative would include the following sites that have the potential for significant impacts associated with flooding/inundation: ALT-2, ALT-7, and C-6. Future development under all three housing strategies and the SMUP Alternative would be required to adhere to applicable Federal, State, and local regulations regarding the

protection of sensitive resources and implement similar mitigation measures to reduce significant impacts to historical resources. However, development under this alternative would result in slightly fewer impacts to flooding and dam inundation compared to any of the three housing strategies because fewer of the sites with the potential for sensitive species are included in this alternative. Therefore, impacts to flooding/inundation under the SMUP Alternative would be less than the HEU.

i. Land Use

Issue 1: Plan and Policy Consistency Impacts

Impacts related to plan and policy consistency from future development under the SMUP Alternative would be the same as the HEU housing strategies. Future development under all three housing strategies and the SMUP Alternative would be reviewed for consistency with regional and local plans and policies. Therefore, impacts associated with plan and policy consistency under the SMUP Alternative and the proposed HEU would be the same.

Issue 2: Conflict with State Planning Initiatives

Impacts related to conflict with State planning initiatives from future development under the SMUP Alternative would be the same as the HEU housing strategies. Future development under all three housing strategies and the SMUP Alternative would fully account for capacity for future development consistent with State Housing Element Law and allow the City to conform to its RHNA obligations. Therefore, impacts associated with conflict with State planning initiatives under the SMUP Alternative and the proposed HEU would be the same.

Issue 3: Neighborhood Compatibility Impacts

With respect to traffic impacts associated with neighborhood compatibility, see Section 9.3.3.2(m), below.

With respect to noise impacts associated with neighborhood compatibility, see Section 9.3.3.2(j), below.

With respect to aesthetics impacts associated with neighborhood compatibility, see Section 9.3.3.2(a), above.

Issue 4: Result in Land Use Conflicts In Relation to the Proximity of Housing to Existing Agricultural Uses/Commodity Sites

Impacts related to housing in proximity to existing agriculture from future development under the SMUP Alternative would be less than HEU housing strategies. As discussed in Section 4.9.8, buildout of housing sites that are on or adjacent to agricultural commodity parcels could result in significant impacts associated with the interface between agricultural operations and residential uses. These sites include:

- Housing Strategy 1 (RM): L-4, L-5
- Housing Strategy 2 (BYO): L-7
- Housing Strategy 3 (MMUP): L-7

Although, future development of these housing sites would not likely result in a significant impact associated with land use (agricultural use) conflicts due to the nature of greenhouse agriculture, none of these housing sites would be included in the SMUP Alternative. Therefore, impacts to housing in proximity to existing agriculture under the SMUP Alternative would be less than the HEU.

Issue 5: Result in Exposure of Persons to Noise Levels in Excess of Standards Established in the Local General Plan

Impacts related to exposure of persons to noise levels in excess of General Plan standards from future development under the SMUP Alternative would be the same as the HEU housing strategies. Specifically, future development could result in interior noise levels exceeding the residential interior noise level standard of 45 L_{dn}. Future development under all three housing strategies and the SMUP Alternative would be reviewed for consistency with the General Plan and similar mitigation measures would be implemented to reduce noise level impacts to less than significant. Implementation of these mitigation measures would reduce significant impacts to less than significant under either the HEU or No Project Alternative and impacts would be the same.

j. Noise

Issue 1: Ambient Noise Levels

Impacts related to ambient noise levels from future development under the SMUP Alternative would be the same as the HEU housing strategies. Because of the increase in regional growth that is expected to occur, there would be an increase in existing ambient noise levels under either plan. The increase in ambient noise attributed to the HEU (all strategies) would be less than 3 decibels adjacent to all roadway segments. Likewise, buildout of the SMUP Alternative would result in a similar increase in ambient noise levels. Impacts to ambient noise levels under the SMUP Alternative and the HEU would be the same.

Impact 2: On-Site Generated Noise

Impacts related to on-site generated noise from future development under the SMUP Alternative would be the same as the HEU housing strategies. Future on-site generated noise sources have the potential to exceed to property line noise levels limits established in the City's Noise Ordinance Development. Future development under all three housing strategies and the SMUP Alternative would be required to adhere to local noise regulations aimed at controlling noise levels and reducing noise related incompatibilities between land uses, and similar mitigation measures would be implemented to reduce noise level impacts to less than significant. Therefore, impacts associated with on-site generated noise under the SMUP Alternative and the HEU would be the same.

Impact 3: Temporary Noise

Impacts related to temporary noise from future development under the SMUP Alternative would be similar to the HEU housing strategies. As discussed in Section 4.10.7, while noise levels would vary depending on the nature of the construction including the duration of specific activities, significant impacts would occur if residential land uses are located closer than 110 feet of construction activities. Buildout of the following housing sites would be located less than 110 feet from existing residential uses and could result in significant impacts:

- Housing Strategy 1 (RM): C-7, L-2, L-6, OE-5
- Housing Strategy 2 (BYO): None
- Housing Strategy 3 (MMUP): ALT-2, ALT-7, CBHMG-1

The SMUP Alternative would result in the same construction-generated noise as all three HEU strategies because it would include two sites that have the potential for significant impacts associated with temporary noise: ALT-2, ALT-7. Future development under all three housing strategies and the SMUP Alternative would be required adhere to local noise regulations aimed at restrictions on construction noise and implement similar mitigation measures to reduce significant impacts to construction noise. Therefore, impacts to temporary noise under the SMUP Alternative would be the same as the HEU.

Impact 4: Groundborne Noise and Vibration

Impacts related to groundborne noise and vibration from future development under the SMUP would be the same as the HEU housing strategies. No operational components of either plan would include significant groundborne noise or vibration sources and no significant vibrations sources currently exist, or are planned in the City. No significant groundborne noise or vibration impacts would occur with the operation of future projects implemented under the HEU or the SMUP Alternative. Therefore, impacts associated with groundborne noise and vibration under the SMUP Alternative and the HEU would be the same.

k. Population and Housing***Issue 1: Population Growth***

Impacts related to population growth from future development under the SMUP Alternative would be the same as the HEU housing strategies. Future development under all three housing strategies and the SMUP Alternative would be required to adhere to the General Plan, provide required development impact fees, and comply with applicable development regulations to assure that the City is capable of supporting the growth. Therefore, impacts associated with population growth under the SMUP Alternative and the proposed HEU would be the same.

Issue 2: Displacement of People

Impacts related to displacement of people from future development under the SMUP Alternative would be the same as the HEU housing strategies. Future development under all three housing strategies and the SMUP Alternative would not anticipate the displacement of people during development/redevelopment. Therefore, impacts associated with displacement of people under the SMUP Alternative and the HEU would be the same.

I. Public Services and Recreation***Issue 1: Fire Rescue Service***

Impacts related to fire rescue service from future development under the SMUP Alternative would be the same as the HEU housing strategies. Both the HEU and SMUP Alternative would increase demand for fire rescue services over time. Future development under all three housing strategies and the SMUP Alternative would be required to adhere to the General Plan, as well as implement regulatory fire mitigation fees pursuant to Title 23 of the City's Municipal Code assuring that future projects maintain adequate levels of service. At this program-level, impacts under both the HEU and SMUP Alternative would be less than significant. Therefore, impacts associated with fire rescue service under the SMUP Alternative and the proposed HEU would be the same.

Issue 2: Police Service

Impacts related to police service from future development under the SMUP Alternative would be the same as the HEU housing strategies. Both the HEU and SMUP Alternative would increase demand for police service over time. Future development under all three housing strategies and the SMUP Alternative would be required to adhere to the General Plan, assuring that adequate levels of service are available in conjunction with future development. At this program-level, impacts under both the HEU and SMUP Alternative would be less than significant. Therefore, impacts associated with police service under the SMUP Alternative and the proposed HEU would be the same.

Issue 3: Schools

Impacts related to schools from future development under the SMUP Alternative would be the same as the HEU housing strategies. Both the HEU and SMUP Alternative would increase demand for schools. Future development under all three housing strategies and the SMUP Alternative would be required to pay statutory fees to assure the reduction of school impacts. At this program-level, impacts under both the HEU and SMUP Alternative would be less than significant. Therefore, impacts associated with schools under the SMUP Alternative and the proposed HEU would be the same.

Issue 4: Library Services

Impacts related to library services from future development under the SMUP Alternative would be the same as the HEU housing strategies. The demand for library services under

the SMUP Alternative would be similar to the HEU; the City has adequate facilities to serve the needs under either plan. Therefore, impacts associated with library services under the SMUP Alternative and the proposed HEU would be the same.

Issue 5: Recreation

Impacts related to recreation from future development under the SMUP Alternative would be the same as the HEU housing strategies. The demand for parks and recreational facilities under the SMUP Alternative would be similar to or incrementally less than the HEU; however, the City has adequate facilities to serve the needs under either plan. Therefore, impacts associated with recreation under the SMUP Alternative and the proposed HEU would be the same.

m. Transportation/Traffic

Issue 1 and 2: Circulation System Capacity and Operations

The SMUP Alternative generates fewer daily trips than the most intense HEU strategy (MMUP), but a greater number of trips than under housing strategy 1 (RM) or 2 (BYO). Impacts related to circulation system capacity and operations from the SMUP Alternative would be less than under the HEU (MMUP), but incrementally greater than under housing strategies 1 (RM) and 2 (BYO). As identified in Section 4.13.1.2, multiple roadway (and freeway) segments and intersections throughout the City currently operate at substandard LOS E or F. Increased traffic under the Reduced Alternative would further degrade conditions similar to the HEU. Future development under the HEU would be reviewed for consistency with this PEIR and compliance with the mitigation framework therein. Likewise, similar mitigation measures to that proposed under the HEU would be required for development under the SMUP Alternative. Implementation of the mitigation framework would reduce traffic impacts under the HEU and SMUP Alternative; however, not to a less than significant level. Therefore, impacts relative to circulation system capacity and operations under the SMUP Alternative would be significant and unavoidable, the same as the HEU.

Issue 3: Alternative Transportation

Future development under both the HEU and the SMUP Alternative would be required to adhere to General Plan goals and policies regarding alternative transportation. Buildout under both the HEU housing strategies and the SMUP Alternative would be required to comply with transportation demand management measures detailed in the mitigation framework. Compliance with adopted policies relative to alternative transportation and the mitigation framework would reduce significant impacts to less than significant under either the HEU or SMUP Alternative and impacts would be the same.

Issues 4 and 5: Traffic Hazards and Emergency Access

Impacts related to traffic hazards and emergency access from future development under the SMUP Alternative would be the same as the HEU housing strategies. Future development

under all three housing strategies and the SMUP Alternative would be required to adhere to road standards and design specifications intended to assure the safety of the City's roadway system. Regulatory compliance would reduce significant impacts to less than significant under either the HEU or SMUP Alternative and impacts would be the same.

n. Utilities and Service Systems

Issue 1a: Storm Drain System

Impacts related to storm drain systems from future development under the SMUP Alternative would be similar to buildout under the HEU housing strategies. The growth anticipated under the HEU is similar to the SMUP Alternative, and likewise, future development would result in similar increases in storm water runoff. The City's Stormwater Manual requires future development to implement project-specific measures to control and reduce storm water runoff. Therefore, at this program-level of analysis, neither the HEU nor the SMUP Alternative would result in the need for expanded or newly constructed storm water facilities. Impacts associated with storm drain system would be the same.

Issue 1b and 3: Wastewater

Impacts related to wastewater from future development under the SMUP Alternative would be the same as the HEU housing strategies. The growth anticipated under the HEU is similar to the SMUP Alternative and would result in similar demands on the existing wastewater system. Future development under all three housing strategies and the SMUP Alternative would be required to adhere to General Plan policies ensuring that the rate of growth does not exceed the capability of available services and facilities. Wastewater master planning is in place to assure adequate facilities would be available to serve new development and, no construction or expansion of wastewater facilities would be required under the HEU or the SMUP Alternative. Therefore, impacts to wastewater facilities under the SMUP Alternative and the HEU would be the same.

Issue 1c: Water System

Impacts related to water system from future development under the SMUP Alternative would be the same as the HEU housing strategies. The growth anticipated under the HEU is similar to the SMUP Alternative and would result in similar capacity reduction of the existing water system. Future development under all three housing strategies and the SMUP Alternative would be required to adhere to General Plan policies ensuring that the rate of growth does not exceed the capability of available services and facilities. Water master planning is in place to assure adequate facilities would be available to serve new development and, no construction or expansion of wastewater facilities would be required under the HEU or the SMUP Alternative. Therefore, impacts to water system under the SMUP Alternative and the proposed HEU would be the same.

Issue 2: Water Supply

Impacts related to water supply from future development under the SMUP Alternative would be the same as the HEU housing strategies. The growth anticipated under the HEU is similar to the SMUP Alternative and would result in similar increase in demands for water. Future development under all three housing strategies and the SMUP Alternative would be required to present service letters from either San Dieguito Water District or Olivenhain Municipal Water District assuring that adequate water supplies would be available. Individual development projects would also be required to assure adequate measures are proposed to meet all water conservation requirements pursuant to the General Plan and City Municipal Code. Plans for water supply are in place to assure adequate facilities would be available to serve new development under the HEU or the SMUP Alternative. Therefore, impacts to water supply under the SMUP Alternative and the proposed HEU would be the same.

Issue 4: Solid Waste Disposal

Impacts related to solid waste disposal future development under the SMUP Alternative would be the same as the HEU housing strategies. The growth anticipated under the HEU is similar to the SMUP Alternative and would result in similar increase in demands for solid waste disposal. Future development under all three housing strategies and the SMUP Alternative would be required to implement State and local recycling programs, and adhere to all General Plan and City Municipal Code section aimed at reducing waste and the diversion of recyclables from the City waste stream. Solid waste and landfill planning are in place to assure adequate facilities would be available to serve new development and, no construction or expansion of solid waste facilities would be required under the HEU or the SMUP Alternative. Therefore, impacts to solid waste disposal under the SMUP Alternative and the proposed HEU would be the same.

9.3.2.3 Conclusion Regarding the Sustainable Mixed Use Places Alternative

The SMUP Alternative would incrementally reduce significant impacts associated with aesthetics, air quality, biological resources (sensitive wildlife/vegetation species and wetlands), cultural/paleontological resources, land use (neighborhood compatibility and proximity to agricultural sites), hazardous materials, and hydrology compared to the HEU housing strategies (refer to Table 9-2). Although traffic impacts would remain significant and unavoidable for the HEU, the SMUP Alternative would reduce traffic impacts through a reduction in trip generation. This alternative would also reduce aesthetic impacts and provide greater alternative transit opportunities. Thus, the SMUP Alternative would meet all the project's objectives and would result in compliance with State Housing Element law while meeting the City's share of allocated RHNA units.

9.4 Environmentally Superior Alternative

CEQA Guidelines Section 15126.6(e)(2) requires an EIR to identify the environmentally superior alternative. If the No Project Alternative is the environmentally superior alternative, the EIR must identify an environmentally superior alternative from the other alternatives. The project itself may not be identified as the environmentally superior alternative.

The SMUP Alternative is considered the environmentally superior alternative, because it would incrementally reduce significant impacts associated with aesthetics, air quality, biological resources (sensitive wildlife/vegetation species and wetlands), cultural/paleontological resources, land use (neighborhood compatibility and proximity to agricultural sites), hazardous materials, and hydrology compared to the project's HEU housing strategies (refer to Table 9-2). Although traffic impacts would remain significant and unavoidable for the HEU, the SMUP Alternative would reduce these impacts through the selection of housing sites described above in the SMUP Alternative to reduce trips generation while improving aesthetics and alternative transit opportunities. Thus, the SMUP Alternative would meet all the project's objectives and would result in compliance with State Housing Element law while meeting the City's share of allocated RHNA units. In conclusion, the SMUP Alternative is considered the environmentally superior alternative, because it would result in fewer impacts than any of the project's three HEU housing strategies and still meets the project's objectives.