

8.0 PROJECT ALTERNATIVES

8.1 Introduction

In order to fully evaluate proposed projects, CEQA requires that alternatives be discussed. Section 15126.6 of the State 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 evaluate 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 some degree the attainment of the project objectives as listed in *Section 2.3* of this EIR.

Pursuant to the guidelines stated above, a range of alternatives to the proposed project are considered and evaluated in this EIR. These alternatives were developed in the course of project planning, environmental review, CPP meetings, and public hearings. The discussion in this section provides:

1. A description of alternatives considered.
2. An analysis of whether the alternatives meet most of the objectives of the proposed project (described in *Section 2.3* of this EIR).
3. A comparative analysis of the alternatives under consideration and the proposed project. The focus of this analysis is to determine if alternatives are capable of eliminating or reducing the significant environmental effects of the project to below a level of significance.

8.2 Alternatives under Consideration

An analysis of alternatives has been provided in this document to provide decision makers with a reasonable range of possible alternatives to be considered. The alternatives discussion in this EIR focuses on two alternatives, including the No Project alternative. Each of the alternatives is described below. For each alternative, only those issues that resulted in significant impacts under the proposed project are compared pursuant to CEQA Guidelines 15126.6(a).

In accordance with CEQA Guidelines Section 15126.6(f)(2), the applicant and City attempted to identify feasible alternative off-site locations within the communities of Old Encinitas or Leucadia that could be available for a single-family home development such as the proposed project. Per CEQA Guidelines Section 15126.6(f)(2)(A), the key question and first step in analysis of the off site location is whether any of the significant effects of the project would be

avoided or substantially lessened by putting the project in another location. However, the applicant does not have immediate ownership of any similarly-sized land in these communities. As such, the applicant cannot reasonably acquire, control, or otherwise have access to an off-site alternative location that would meet the project objectives. Therefore, off-site locations are considered infeasible no off-site location alternatives were carried forward in this analysis. Regardless, the availability of an alternate site does not in and of itself reduce impact potential. It is expected that developing a similar project would result in a similar array of project impacts and would simply transfer this impact potential to areas surrounding the alternate site location. For these reasons, an alternate site location would not necessarily be preferred over the proposed project site.

Also, a reduced density alternative was initially considered but found to be infeasible, because the project's density is not necessarily the cause of the identified significant impacts to aesthetics, biological resources, and noise. That is, regardless of the number of homes proposed, similar significant impacts would occur. For example, for the issue of aesthetics, the option of proposing just one lot was considered, with the intent of reducing the height of the retaining walls. However, the proposed retaining walls provide the function of conveying sewer and stormwater toward the public access and Ocean View Avenue, away from the easterly wetlands. As such, even with construction of just one home, the same retaining wall height would be necessary to adequately convey sewer and stormwater to the west. Regarding noise, reducing the number of proposed homes would result in reduced impacts since fewer sensitive receptors would be impacted; nonetheless, significant noise impacts would still result. Lastly, reducing the number of homes would not meet Project Objective no. 1 as identified in *Section 2.3*. Therefore, reducing the height of the retaining walls is not feasible, and a reduced density alternative was not carried forward for detailed environmental evaluation.

8.2.1 No Project Alternative

Under the No Project alternative, the applicant would not construct the proposed 4-unit residential development project. In the short-term, the existing vacant land would remain; therefore, none of the environmental impacts associated with the construction and operation of the proposed project would occur, including impacts to aesthetics, biological resources, and noise.

Implementation of this alternative would not preclude future development of the proposed project site. As the property is zoned R-3, there is the possibility that another residential project could be developed at a similar density as proposed under the current project.

Environmental Analysis

Aesthetics

The No Project alternative would maintain existing aesthetic conditions on the site and would not result in the identified significant aesthetics impacts identified in *Section 4.1.4* of this EIR. Therefore, impacts to aesthetics would be avoided with implementation of the No Project alternative.

Biological Resources

The No Project alternative would maintain existing biological conditions on the site and would not result in the identified significant impacts identified in *Section 4.2.4* of this EIR. Therefore, impacts to biological resources would be avoided with implementation of the No Project alternative.

Noise

This alternative would avoid the project's identified noise impacts at the proposed four residences. This alternative, however, would not result in the beneficial impact to existing residences resulting from the project's construction of sound walls.

Summary

Overall, the No Project alternative would be environmentally superior to the proposed project, as none of the environmental impacts associated with future development or impacts identified in this EIR would occur; however, the No Project alternative does not meet any of the objectives set forth in *Section 2.3* of this EIR.

8.2.2 Reduced Noise Impact Alternative

This alternative's objective is to reduce to significant and unmitigable noise impacts to the four proposed lots that would result under the proposed project. Under this alternative, a 20-foot-high sound wall would be constructed along the northern and eastern property boundary, similar to the 8-foot barrier shown in *Figure 4.3-2*. The project's noise technical report concludes that a 20-foot-high barrier would sufficiently reduce noise impacts to less than significant levels.

Environmental Analysis

Aesthetics

The Reduced Noise Impact alternative would result in the construction of a 20-foot-high sound wall, which would be 12 feet higher than the proposed project's 8-foot-high sound barrier. Therefore, this alternative would result in greater significant aesthetics impacts than those

identified in *Section 4.1.4* of this EIR. Importantly, because the project site is visible from I-5, a City-designated Scenic/Visual Corridor, landscaping mitigation for a wall of this height would not reduce impacts to less than significant levels.

Biological Resources

This alternative would result in the same identified significant impacts identified in *Section 4.2.4* of this EIR since the overall footprint would be identical. Therefore, impacts to biological resources (annual non-native grassland, raptors, and indirect impacts to wetlands) would not be avoided with implementation of this alternative.

Noise

With construction of a 20-foot-high sound wall, this alternative would avoid the project’s identified noise impacts at the proposed four residences.

Summary

This alternative would fulfill all of the project objectives as outlined in *Section 2.3*. Although this alternative would reduce the project’s identified significant noise impacts, it would result in greater visual effects that would not be fully mitigable. Therefore, this alternative is not capable of providing superior impact reduction or mitigation for significant impacts when compared to the proposed project.

8.2.3 Alternatives Summary and Environmentally Superior Alternative

A matrix comparing the significant environmental effects of each alternative is provided below in *Table 8-1*. CEQA requires that an environmentally superior alternative be identified (other than the No Project alternative). CEQA also requires that the environmentally superior alternative be selected from a range of reasonable alternatives that could feasibly attain the basic objectives of the project.

As discussed above, the Reduce Noise Impact alternative would result in reduced noise impacts when compared to the proposed project, but increased visual impacts. Therefore, the proposed project is considered to be the environmentally superior alternative.

**Table 8-1
Comparison of Alternatives’ Impacts**

Environmental Issue	No Project Alternative	Reduced Noise Impact Alternative
Aesthetics	Impacts avoided	Greater Impacts
Biological Resources	Impacts avoided	Similar impacts
Noise	Impacts avoided	Reduced impacts