7.0 ALTERNATIVES ANALYSIS

7.1 Introduction

The primary intent of the alternatives analysis in an EIR, as stated in §15126.6(a) of the State CEQA Guidelines, is to "describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." Further, the CEQA Guidelines state that "the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly" (Guidelines §15126.6(b)). An EIR must describe a range of reasonable alternatives to the proposed project that could feasibly attain most of the basic objectives of the project. The feasibility of an alternative may be determined based on a variety of factors, including but not limited to economic viability, availability of infrastructure, and other plans or regulatory limitations (Guidelines §15126.6(f)(1)).

7.2 Project Objectives

As indicated above, the choice of alternatives is guided primarily by the need to either avoid or substantially lessen significant impacts and to achieve most project objectives. As stated in **Section 2.4.1**, Purposes and Objectives of the General Plan, the project objectives established by the City are to preserve or achieve:

- An open space network formed by parks, canyons, river valleys, habitats, beaches, and ocean;
- Diverse residential communities formed by the open space network;
- Compact and walkable mixed-use villages of different scales within communities;
- Employment centers for a strong economy;
- An integrated regional transportation network of walkways, bikeways, transit, roadways, and freeways that efficiently link communities and villages to each other and to employment centers;
- High quality, affordable, and well-maintained public facilities to serve the City's population, workers, and visitors;
- Historic districts and sites that respect our heritage;
- Balanced communities that offer opportunities for all San Diegans and share citywide responsibilities;

- A clean and sustainable environment; and
- A high aesthetic standard.

7.3 Comparative Analysis of Alternatives

There are many potential General Plan alternatives that could be considered for implementation by the City. Analysis of every possible alternative is infeasible and would be redundant. Furthermore, CEQA does not require that every alternative be considered. This section describes the reasonable range of alternatives that were developed by the City during the planning process for the EIR.

Nine alternatives were identified by the City for examination and analysis in this EIR. The alternatives considered in the EIR are:

- Alternative Location
- City of Villages Increased Growth Alternative
- General Intensification Alternative
- Reduced Density/Maintain Existing Neighborhood Character
- Reduced Industrial Lands Protections Alternative
- No Project
- Enhanced Sustainability
- Increased Parking Management
- Concentrated Growth

The alternatives presented above have undergone varied levels of analysis, depending on their potential feasibility and ability to reduce significant effects. Five of the nine alternatives were determined to be infeasible and rejected from further analysis as described below in **Section 7.3.1**.

7.3.1 Alternatives Considered but Rejected From Further Analysis

Consistent with CEQA, primary consideration was given to alternatives that could reduce significant impacts, while still meeting most of the project objectives. All alternatives were subject to a preliminary feasibility analysis. Five of the alternatives were determined to be infeasible as a result of this review and rejected from further consideration. The rejected alternatives are described below.

Alternative Location

According to the State CEQA Guidelines, the range of alternatives should include evaluation of alternative "locations that would avoid or substantially lessen any of the significant effects of the

project" (Guidelines §15126.6(f)(2)(A)). The proposed Project is a General Plan, which guides the future development of the City of San Diego. Since the proposed Project is specific to the City of San Diego, no feasible alternative location exists that could be used for meaningful analysis.

City of Villages Increased Growth Alternative

Under this alternative, 17,000 to 37,000 multifamily dwelling units in excess of adopted community plan capacity would be added to areas of the City with a high propensity for village development as shown in the Draft General Plan. The assumptions of this alternative are similar to the analysis undertaken for the Strategic Framework Element (SFE) Final EIR, in which the environmental impacts of the addition of 17,000 to 37,000 units located on the City of Villages Map were evaluated.

The SFE Final EIR evaluated the citywide impacts of these additional units, but did not provide site-specific analyses. The City received many comment letters asking for an analysis of more detailed, site- and community-specific environmental impacts related to these units. Members of the public also recommended that village sites be designated through the community plan update process, with attention to public facilities, traffic and neighborhood character issues among others.

As a part of the process to update the General Plan, City staff further investigated whether sites identified on the City of Villages Map, which was ultimately adopted as the City of Villages Opportunities Area Map[1] in the City of Villages Action Plan, would be suitable for village development. Given the complexity of the sites and the communities in which they are located, and the public interest in the planning process, staff concluded that the more detailed study and environmental analysis of potential village sites would best occur at the community plan level. Policies were included in the Land Use and Community Planning Element outlining the role of the General Plan and community plans, and calling for the community plans to provide site-specific land use and design recommendations that implement the citywide vision. To implement the General Plan and to maintain internal consistency, the City Planning and Community Investment department is developing a work program to update all community plans over a 12-year period.

Therefore, this alternative was rejected from further analysis because mandating the addition of 17,000 to 37,000 units to areas of the City with high village propensity through General Plan policies would be inconsistent with the City's established community planning program, which identifies community plans as the appropriate vehicle for determining detailed land use designations and site-specific recommendations, and it is unlikely to be implemented since a proposal similar to the City of Villages Increased Growth Alternative faced intense public opposition and was rejected by the Mayor and City Council in 2002.

General Intensification Alternative

This alternative was originally considered as a means of accommodating future population growth equally among the City's communities. This alternative would—similar to the City of

[1] City of San Diego, Action Plan, Appendix A, 2002

Villages Increased Growth Alternative—add approximately 17,000 to 37,000 residential units to the City in excess of adopted community plan capacity. However, instead of targeting the additional units to community plan areas with high village propensity as shown in the Draft General Plan., the additional residential units would be distributed equally throughout every community in the City irrespective of its village propensity. The number of residential units added to each community under this alternative would be proportional to the community's size. By locating new residential units equally throughout the City, this alternative would result in fewer localized traffic impacts and greater attainment of the balanced communities' project objective. However, this alternative was rejected from further consideration because accommodating future growth equally through the communities of the City irrespective of village propensity would not meet several of the primary project objectives. First, by directing growth equally throughout City, this alternative would result in new housing development within areas of varying degrees of village propensity. Although communities with a higher village propensity would be able to accommodate the new growth under this alternative, communities with a lower village propensity do not include the, public facilities and services, mixture of land uses, walkable design, proximity to transit stations, higher frequency transit service, and/or other characteristics needed to accommodate residential intensification while meeting project objectives.

Under this alternative, all communities would be forced to accommodate their proportion of the City's new residential units regardless of environmental considerations such as canyons, habitat, and other valuable open spaces or environmentally sensitive lands. Thus, environmentally sensitive lands would be subject to increased development pressure. In addition, providing infrastructure and public services to serve new growth in all communities would be less efficient and more expensive. Environmental impacts associated with traffic, air quality, biological resources, land use, public facilities and possibly others would likely increase under this alternative. Also, this alternative would not necessarily meet project objectives of achieving walkable, mixed-use villages, an integrated and efficient regional transportation network, high-quality, affordable public facilities, a clean and sustainable environment, and an open space network formed by parks, canyons, habitat, and other open spaces.

Reduced Density/Maintain Existing Neighborhood Character Alternative

This alternative was considered as a means to reduce growth in the City to a level below that which could currently be built in accordance with the City's adopted community plans in order to maintain the existing character of the City's neighborhoods. Under this alternative, the General Plan policy would call for residential density reductions to occur in conjunction with community plan updates. This alternative could result in a reduction in planned densities in communities with a higher village propensity as well as in other areas throughout the City in an effort to minimize change.

Reducing the residential density of adopted community plans would reduce the City's housing stock and increase the demand for housing. Since population growth and demand for housing would continue to increase over time regardless of the residential density reductions, this alternative would likely (1) force many of the housing units needed to accommodate the City's projected population growth outside of the City into other jurisdictions such as other cities in the county and undeveloped portions of San Diego, Riverside, and Imperial counties as well as Baja California, and (2) result in the overcrowding of existing units, the division of existing single-

family homes into multiple units, or other changes to existing neighborhoods as a result of increased housing demand combined with limited housing supply.

In the short-term, this alternative would reduce localized traffic congestion and noise impacts, and maintain the character of existing neighborhoods. However, the short-term benefits of this alternative would lessen and eventually disappear altogether with time as unplanned growth would occur under one or both of the two scenarios described above. Over the long-term, growth would likely increase the environmental impacts associated with agricultural resources, air quality, biological resources, hydrology, paleontological resources, noise, traffic, water quality and possibly others.

Further, reducing the City's housing capacity would be inconsistent with the City's adopted Housing Element and state law pertaining to the provision of housing opportunities. State housing element law requires that the City identify an adequate amount of multifamily zoned land or take other actions to accommodate their share of the region's lower income housing needs. The City's Housing Element, which was adopted in December 2006, identified adequate multifamily zoned land for the 2005-2010 housing element cycle consistent with state requirements. Therefore, this alternative would be infeasible since it would increase the environmental impacts of the Draft General Plan and conflict with the City's adopted Housing Element and state housing element law.

Reduced Industrial Lands Protections Alternative

The Reduced Industrial Lands Protection Alternative would not identify Prime Industrial Lands (i.e., areas that support economic base sector employment activities) or policies intended to protect the industries located on such lands. Specifically, this alternative would eliminate the policies of the Draft General Plan prohibiting: (1) the conversion of Prime Industrial Lands to non-industrial land uses, (2) the collocation of residential or non-industrial uses into industrial uses on Prime Industrial Lands, and (3) discretionary projects for public assembly or sensitive receptor lands uses on Prime Industrial Lands. In addition, all General Plan policies (e.g., residential and industrial collocation) that apply to industrial areas or employment lands not identified as Prime Industrial lands under the Draft General Plan would be applied to all industrial areas and employment lands under this alternative.

This alternative is analyzed as an alternative to the Prime Industrial Lands policies of the Draft General Plan. Therefore, this alternative is analyzed for conformance with project objectives associated with industrial lands. According to the Economic Prosperity Element of the Draft General Plan, the project goals associated with industrial lands include the following:

- A diversified economy with a focus on providing quality employment opportunities and livable wages for San Diegans;
- A city with sufficient employment, land and capacity for base sector industries appropriate designed to sustain a strong economic base;
- Efficient use of existing employment lands; and

- No loss of employment land for base sector industries that contribute significantly to the regional or local economy.

Since goals (2) and (4)—half of the project goals associated with industrial lands—would not be achieved, this alternative was rejected from further analysis.

7.3.2 Alternatives Analyzed in this Section

The four remaining alternatives that are comparatively analyzed in this section are:

- No Project
- Enhanced Sustainability
- Increased Parking Management
- Concentrated Growth

In response to comments made on the Draft General Plan PEIR during the public review period, the City has undertaken the following actions to reduce the GHG emissions of future development and City operations under the General Plan and meet its obligations under CEQA to mitigate the cumulatively significant global warming impacts of the General Plan: (1) modify the policy language of the October 2006 Draft General Plan to expand and strengthen climate change policies; (2) ensure that policies to reduce greenhouse gas (GHG) emissions are imposed on future development and City operations by incorporating them into the Mitigation Monitoring and Reporting Program (MMRP) for the Final EIR; and (3) initiate work on a General Plan Action Plan to identify measures such as new or amended regulations, programs and incentives to implement the GHG reduction policies.

Based on this approach, the Conservation Element of the General Plan has been revised to: incorporate an overview of climate change; discuss existing state and City actions to address climate change impacts; and establish comprehensive policies that would reduce the GHG emissions of future development, the existing community-at-large, and City operations. A key new Conservation Element policy is to "reduce the City's carbon footprint" and to "develop and adopt new or amended regulations, programs and incentives as appropriate to implement the goals and policies set forth" related to climate change (CE-A.2). Additional policies have been added to "collaborate with climate science experts" to allow informed public decisions (CE-A.3) and to "regularly monitor, update and implement the City's Climate Protection Action Plan (CE-A.13)." The overall intent of these new policies is to unequivocally support climate protection actions, while retaining flexibility in the design of implementation measures which could be influenced by technological advances, environmental conditions, state and federal legislation, or other factors.

In addition, the Draft General Plan Land Use and Community Planning; Mobility; Urban Design; and Public Facilities, Services, and Safety elements have been edited to better support GHG reduction and climate change adaptation goals. These elements contain policy language related to sustainable land use patterns, alternative modes of transportation, energy efficiency, water supply, and GHG emissions associated with landfills. The Draft General Plan also calls

for the City to employ sustainable building techniques, minimize energy use, maximize waste reduction and diversion, and implement water conservation measures. By adding these comprehensive policies into the Draft General Plan and MMRP and identifying Action Plan measures to implement these policies, the City has incorporated the principal objectives of the environmentally superior Enhanced Sustainability Alternative into the Draft General Plan. Furthermore, the addition of Policy ME-G.5 to the Mobility Element to "implement parking strategies that are designed to help reduce the number and length of automobile trips …" implements the principal objective of the Increased Parking Management Alternative.

No Project

This alternative is analyzed within this Program EIR as it is required under CEQA Guidelines §15126.6(e). According to §15126.6(e)(2) of the CEQA Guidelines, which states that the "no project" analysis shall discuss, "…what is reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services." When the project is the revision of an existing land use policy, CEQA Guidelines §15126.6(e)(3)(A) states that "the No Project Alternative will be the continuation of the existing plan…into the future." So, for the purposes of this Program EIR, the No Project Alternative represents buildout under the currently adopted plans as further described below. This alternative does not represent a "no build" scenario in which no future development would occur.

Under the No Project Alternative the Draft General Plan would not be implemented and projected future growth would occur in accordance with the 1979 *Progress Guide and General Plan* (existing General Plan or 1979 General Plan), the Strategic Framework Element, which was adopted by the City Council in October 2002, and the City's Housing Element, which was adopted in December 2006. The existing General Plan, primarily addressed development of vacant land and provision of adequate public facilities in new communities. In addition, the existing General Plan does not have a distinct Land Use Element, but relies exclusively on community plans to provide land use designations and policies.

Currently, developable vacant land accounts for only 3.6 percent or 6,756 acres of the City's total acreage, meaning a majority of future growth will occur in infill and redevelopment areas. While infill development is addressed in some of the City's community plans, the existing General Plan does not establish an effective citywide framework for how to remedy facility deficits, prioritize capital improvements, or to preserve or create a high quality of life as the City matures. The existing General Plan, therefore, is out-of-date, and largely irrelevant for directing the type of future growth and development anticipated to occur in the years to come.
The Strategic Framework Element includes the City of Villages Strategy, which provides guidance to meet projected housing and employment needs and to preserve and enhance the City's many communities and neighborhoods as growth occurs through reinvestment in existing communities. Implementation of the City of Villages Strategy does not encourage or mandate a specific amount of growth. Rather, the Strategic Framework Action Plan indicates that the City of Villages Strategy would be implemented through a series of actions including a comprehensive update to the existing General Plan followed by updates to existing community plans as necessary to achieve consistency with the updated General Plan and implement the City of Villages Strategy.

While community plans could still be updated in the absence of an updated General Plan, there would not be a framework in place to implement citywide policies and to achieve citywide goals, and the Strategic Framework Element would not be fully implemented. Therefore, future growth and development under the No Project Alternative would occur in accordance with the out-of-date policies for directing future growth and inadequate public facilities strategies of the existing General Plan. In addition, there would be no guidance to streamline the preparation of community plans, or to standardize the approximately 160 different land use designations currently in effect. However, community plan updates that take place under this alternative would be subject to the requirements of state Housing Element law to plan for the City's share of projected regional housing needs.

The State of California General Plan Guidelines (2003) call for internal consistency among all elements of a General Plan. Under the No Project Alternative there would be inconsistencies among the 1979 General Plan, community plans and the Strategic Framework Element (such as different approaches to prioritization, inconsistent land use category definitions, inconsistent transit strategies, outdated baseline information, lack of updated public facilities guidelines, differing industrial land use policies, and lack of adequate walkability design guidelines to implement adopted policies) with no overall strategy on how to remedy these inconsistencies. In addition, the General Plan Guidelines state that "most jurisdictions select 15 to 20 years as the long-term horizon for the general plan," and that "a general plan based upon outdated information and projections is not a sound basis for day-to-day decision-making and may be legally inadequate (p. 14). The existing General Plan was last comprehensively updated in 1979.

Relationship to the Project Objectives

This alternative would meet some of the project objectives (see Section 7.2). Objectives Numbers 1, 2, 7, 8, and 9 could be generally met through adherence to adopted community plans and citywide policies such as the Strategic Framework Element City of Villages strategy and the Balanced Communities Council Policy. It would only partially implement project objective Numbers 3 and 5, as it would be more difficult to implement the City of Villages strategy and qualify for regional transportation funds in the absence of a coordinated General Plan framework. Objective Number 4 would also be partially met through existing policies, but would place industrial/employment lands at greater risk than under the Draft General Plan. Objective 6 would not likely be met as the Draft General Plan provides updated public facilities guidelines and strategies for remedying public facilities deficiencies that are not addressed in the 1979 General Plan.

Environmental Effects

Agricultural Resources

According to **Section 3.8**, Land Use, 6,055 acres, or 2.8 percent of the City's total acreage is in existing agricultural use. However, some existing agricultural lands are currently planned for non-agricultural land uses. As a result, implementation of existing plans would decrease the amount of agricultural land uses to 3,670 acres, or 1.7 percent of the City's total acreage. Since the Draft General Plan does not directly propose any land use changes within the City, the loss of existing agricultural lands planned for non-agricultural uses would be similar under both the Draft General Plan and the No Project Alternative.

As discussed in **Section 3.12**, Population and Housing, the City's population is projected to increase by 361,110 persons and its housing stock is projected to increase by 119,983 units by 2030. Population growth is primarily a function of economic and demographic factors and these projections would be similar under both the Draft General Plan and the No Project Alternative. As previously discussed above, developable vacant land accounts for only 3.6 percent or 6,756 acres of the City's total acreage. Since the amount of vacant developable land is limited, development under this alternative and the Draft General Plan would similarly exhaust the limited supply of vacant land. As a result, the remaining 3,670 acres currently planned for agricultural use would be subject to increasing development pressure under both this alternative and the Draft General Plan as population growth increases and the City plans for its share of regional housing needs as required by state law. Therefore, implementation of this alternative would result in similar agricultural resources impacts when compared to the Draft General Plan.

Air Quality

This alternative would not include a comprehensive strategy for encouraging future growth through infill and redevelopment in areas with existing or planned transit investments. In addition, growth under this alternative would be less likely to result in walkable, transit-oriented developments and therefore less conducive to transit use, biking, and walking. Thus, this alternative would likely result in a higher proportion of automobile trips and greater traffic congestion than development under the Draft General Plan. The higher proportion of automobile trips would result in greater emissions of criteria pollutants and greater traffic congestion would increase the number of CO hot spots at intersections within the plan area. Therefore, implementation of this alternative would result in greater air quality impacts associated with increased vehicular emissions and an increased number of CO hot spots when compared to the Draft General Plan. Air quality impacts associated with stationary sources and construction activities would be similar when compared to the Draft General Plan.

Biological Resources

As previously discussed above, developable vacant land accounts for only 3.6 percent or 6,756 acres of the City's total acreage. Vacant and undeveloped lands may include biological resources such as native habitat, wetland habitat, sensitive species or function as segments of wildlife movement corridors. Activities associated with urban development such as mass grading, paving of the landscape, the building of structures, fencing, vehicular traffic, increased ambient noise levels, and roadway and public utility construction on or adjacent to such resources could result in significant impacts to native habitat and wildlife, and habitat fragmentation and isolation. As discussed in **Section 3.12**, Population and Housing, population growth would be similar under both the Draft General Plan and the No Project Alternative. As a result, the remaining 6,756 acres of vacant land would be subject to increasing development pressure under both this alternative and the Draft General Plan as the population increases and the City plans for its share of regional housing needs as required by state law. Since the supply of vacant developable land is limited, it would likely be similarly exhausted under this alternative or the Draft General Plan. In addition, development under this alternative would not be subject to substantially different local, state, and federal regulations, policies, or plans regarding the protection of habitat, wetlands, sensitive species and other biological resources.

Therefore, implementation of this alternative would result in similar biological resources impacts when compared to the Draft General Plan.

Geologic Conditions

Implementation of the No Project Alternative would not substantially alter the City's projected population growth or housing unit increase. As a result, this alternative would not result in the exposure of a substantially different number people or property to geologic hazards such as groundshaking, fault rupture, landslides and others.

The development of structures and impervious surfaces and the removal of vegetative cover on undeveloped lands generally increase the potential for wind and water erosion of soils. Since the pressure to develop the City's remaining vacant land would not be substantially different as the population increases and the City plans for its share of regional housing needs as required by state law, the potential for wind and water erosion of soils would not change. Furthermore, compliance with local, state, and federal regulations associated with seismic risks and other geologic hazards would not be substantially different under this alternative. Therefore, implementation of this alternative would result in similar impacts associated with geologic conditions when compared to the Draft General Plan.

Health and Safety

Implementation of existing local, state, and federal regulations would ensure that the exposure of people or sensitive receptors to potential health hazards associated with hazardous materials does not change substantially under this alternative. In addition, due to climate, topography, and native vegetation, some of the City's new and existing development will be highly subject to wildland fires under this alternative and the Draft General Plan.

Furthermore, this alternative would continue to allow new development within flood prone areas in accordance with local, state and federal floodplain regulations. Therefore, implementation of this alternative would result in similar health and safety impacts when compared to the Draft General Plan.

Historic Resources

Developable vacant land accounts for only 3.6 percent or 6,756 acres of the City's total acreage. Since the amount of vacant developable land is limited, development under this alternative and the Draft General Plan would similarly exhaust the limited supply of vacant land resulting in similar impacts to buried cultural resources. Additionally, as population growth occurs and the supply of vacant and developable land within the City is exhausted, the pressure to develop within existing communities will continue to increase. This infill and redevelopment would have a similar potential to impact important historic resources under this alternative or the Draft General Plan. Mandatory compliance with existing local, state, and federal regulations would further ensure that implementation of this alternative would result in similar impacts to historic and archaeological resources when compared to the Draft General Plan.

Hydrology

As previously discussed above, developable vacant land accounts for only 3.6 percent or 6,756 acres of the City's total acreage. Development of these lands would cover natural vegetated pervious groundcover with impervious surfaces such as paved highways, streets, rooftops, and parking lots. The introduction of new or expanded impermeable surface areas can potentially affect existing hydrology including absorption rates, drainage patterns, and the rate of surface runoff. The plan area is currently highly urbanized and features a large amount of impermeable surface areas.

As discussed in **Section 3.12**, population growth would be similar under both the Draft General Plan and the No Project Alternative. As a result, the remaining 6,756 acres of vacant land would be subject to increasing development pressure under both this alternative and the Draft General Plan as the population increases and the City plans for its share of regional housing needs as required by state law. Since the supply of vacant developable land is limited, it would likely be similarly exhausted under this alternative or the Draft General Plan.

Although new development under the No Project Alternative would be subject to the Strategic Framework Element City of Villages strategy and could be more compact as a result, the amount of new impervious surfaces introduced under this alternative, when considered with the large amount of existing impervious surface, would not significantly increase the amount of impervious surfaces within the plan area. Furthermore, development under this alternative would comply with all applicable local, state, and federal regulations associated with hydrology. Therefore, implementation of this alternative would result in similar hydrologic impacts when compared to the Draft General Plan.

Land Use

Development under the No Project Alternative would comply with the mandatory policies of any adopted environmental plans, policies or regulations of any state or federal agency, including applicable habitat conservation plans as well as adopted Airport Land Use Compatibility Plans.

Since development under the No Project Alternative would occur in accordance with existing community plans, this alternative would not result in impacts to the environmental goals or land use designations of these plans. Because community plans would remain in effect, impacts associated with physically dividing an established community would also be similar to the Draft General Plan. Community plans are used to identify the community's street network, and policies are in place to protect community character under both the No Project Alternative as well as the Draft General Plan. Development under this alternative would not result in substantially different impacts associated with adopted Airport Land Use Compatibility Plans.

Furthermore, development under the No Project Alternative would be less likely to occur through infill and redevelopment over the short-term as remaining vacant developable land is developed. As a result, impacts related to land use incompatibilities associated with infill and redevelopment, such as close proximity of sensitive receptors to noise from traffic, industrial, and entertainment uses, would be less over the short-term. However, as population growth occurs and the supply of vacant and developable land within the City is exhausted, the pressure to develop within existing communities will increase and eventually occur at a similar level

when compared to the Draft General Plan. Without the Draft General Plan policies that encourage infill and redevelopment and minimize the potential for associated land use incompatibilities, environmental impacts related to land use incompatibilities associated with infill and redevelopment could be greater over the long-term. Therefore, implementation of this alternative would result in greater land use impacts when compared to the Draft General Plan.

Mineral Resources

Impacts to mineral resources occur when access to resources is restricted or prohibited through development of lands containing the resources or when incompatible land uses are developed in close proximity thereby reducing the likelihood for extraction of those resources. However, mandatory compliance with existing local, state, and federal regulations protecting valuable mineral resources would ensure that implementation of this alternative would result in similar impacts to mineral resources when compared to the Draft General Plan.

Noise

The plan area is an existing highly urbanized environment with ambient sources of noise including vehicular traffic, buses, trucks, trains, aircraft and various stationary sources such as industrial and entertainment land uses. Since this alternative would not substantially alter the projected population growth and level of economic activity within the plan area, the amount of noise generated by the sources described above would not change substantially under this alternative when compared to the Draft General Plan. In addition, the amount of construction activity and related short-term noise impacts would not change substantially.

Furthermore, development under the No Project Alternative would be less likely to occur through infill and redevelopment over the short-term as remaining vacant developable land is developed. As a result, impacts related to the exposure of sensitive receptors to incompatible noise levels would be less over the short-term. However, as population growth occurs and the supply of vacant and developable land within the City is exhausted, the pressure to develop within existing communities, and the likelihood of exposing of sensitive receptors to incompatible noise levels, will increase and eventually occur at a similar level when compared to the Draft General Plan. Therefore, over the long-term, implementation of this alternative would result in similar impacts associated with the exposure of sensitive receptors to substantial noise levels when compared to the Draft General Plan. Development under this alternative would comply with the land use compatibility policies of adopted Comprehensive Land Use Plans for airports within and near the plan area impacts associated with the exposure of sensitive receptors to aircraft noise would be similar when compared to the Draft General Plan.

Furthermore, this alternative would not include the proposed change in the Land Use Compatibility Chart included in the Draft General Plan that creates a “conditionally compatible” category, which conditionally permits certain uses in exterior environment with higher ambient noise levels than would be allowed by existing noise standards. However, the “conditionally compatible” category requires new development to undergo detailed noise analysis and incorporate measures to reduce interior noise levels to acceptable levels comparable to existing General Plan policies and project review procedures allow. As a result, noise impacts under this alternative would be similar when compared to the Draft General Plan.

Paleontological Resources

Mass grading, excavation, construction of utility infrastructure and other activities associated with development could impact paleontological resource resources when located on sensitive geologic formations. Land development regulations would not provide protection for paleontological resources under this alternative or under the Draft General Plan. However, impacts to such resources would be identified and protected through the environmental review process for discretionary projects under both this alternative and the Draft General Plan. Therefore, implementation of this alternative would result in similar paleontological resources impacts when compared to the Draft General Plan.

Population and Housing

Infill and redevelopment can lead to displacement of residents as existing housing units are demolished or replaced with generally more expensive housing units. As areas redevelop, older housing units, and in some cases more affordable housing units, will be replaced by higher cost housing units. Low-income households are most likely to be adversely affected. This could result in displacement and relocation of people away from the City and the region in search of more affordable housing. Displacement could necessitate construction of some replacement housing in the City and/or region. The displacement of people is considered a social and economic impact, but not a CEQA impact. The construction of replacement housing has the potential to result in physical environmental impacts.

Since development under the No Project Alternative would be less likely to occur through infill and redevelopment, the amount of displacement associated with such development would be less over the short-term. However, as population growth occurs and the remaining supply of vacant lands is exhausted, the pressure to develop within existing communities, and the potential for displacement of residents, will increase and eventually occur at a similar level when compared to the Draft General Plan. Therefore, implementation of this alternative would result in similar impacts associated with displacement of substantial numbers of people and housing when compared to the Draft General Plan.

Public Services and Facilities

As previously discussed, many of the City's older, urbanized communities include deficient levels of public services, facilities and utilities, and/or older facilities and infrastructure in need of replacement. During the short-term, this alternative may result in more development on remaining vacant and developable land and less infill and redevelopment. However, over the long-term, development under this alternative and the Draft General Plan would exhaust the limited supply of vacant land result in and a sizeable amount of future growth through infill and redevelopment. Additional growth within the urbanized communities would likely require the construction of new or physically altered public facilities and utilities, the construction of which could result in environmental impacts. Since this alternative would result in a similar amount of infill and redevelopment when compared to the Draft General Plan, impacts associated with the construction of new or physically altered public facilities and utilities would also be similar.

Public Utilities

Since projected population growth would be similar under this alternative, the consumption of available water supplies would be similar under this alternative when compared to the Draft General Plan. Please see the "Public Services and Facilities" section for discussion of environmental impacts associated with the construction of new or physically altered public utilities.

Transportation/Traffic/Circulation/Parking

Growth under this alternative would be less likely to result in walkable, transit-oriented developments. As a result, the No Project Alternative would likely result in increased automobile trips and reduced multi-modal trips (i.e., transit, biking, and walking). The addition of increased automobile trips to the planned transportation network would increase the number of roadway miles and the percentage of daily vehicle miles traveled at Level of Service E or F. However, existing parking requirements would likely ensure that parking demand does not exceed supply. Therefore, implementation of this alternative would result in greater impacts associated with increased automobile trips and reduced multi-modal trips compared to the Draft General Plan. Impacts related to parking would be similar.

Visual Effects and Neighborhood Character

Since development under the No Project Alternative would be less likely to occur through infill and redevelopment, the amount of negative and substantial change to the existing character of the Plan area would be less over the short-term. However, as population growth occurs and vacant lands are consumed, the pressure to develop within existing communities will increase over time. Existing policies, programs and project review procedures provide a level of assurance similar to proposed Draft General Plan policies that infill and redevelopment is compatible with existing community character. Implementation of this alternative would result in similar impacts to the existing character of the City over the long-term when compared to the Draft General Plan.

Existing City policies would continue to address potential impacts to topography, ground surface relief features and public views from designated open space areas, scenic highways or to any significant visual landmarks or scenic vistas (e.g., mountains, bays, rivers, and the ocean). Although this alternative would be less likely to result in infill and redevelopment with potential to block public views or scenic vistas, impacts to public views or scenic vistas would be similar when compared to the Draft General Plan. Overall, impacts to visual effects and neighborhood character would be similar to the Draft General Plan

Water Quality

As previously discussed above, developable vacant land accounts for only 3.6 percent or 6,756 acres of the City's total acreage. Development of these lands would cover natural vegetated pervious groundcover with impervious surfaces such as paved highways, streets, rooftops, and parking lots. The introduction of new or expanded impermeable surface areas would result in increased runoff, adding to local non-point source pollution. The plan area is currently highly urbanized and features a large amount of impermeable surface areas.

As previously discussed in **Section 3.12**, population growth would be similar under both the Draft General Plan and the No Project Alternative. As a result, the remaining 6,756 acres of vacant land would be subject to increasing development pressure under both this alternative and the Draft General Plan as the population increases and the City plans for its share of regional housing needs as required by state law. Since the supply of vacant developable land is limited, it would likely be entirely consumed under this alternative or the Draft General Plan. New development under the No Project Alternative, when considered with the large amount of existing impervious surface, would not significantly increase the amount of impervious surfaces within the plan area. Furthermore, development under this alternative would comply with all applicable local, state, and federal regulations related to water quality. Therefore, implementation of this alternative would result in similar water quality impacts when compared to the Draft General Plan.

Global Warming

As previously discussed above, this alternative would not include a comprehensive strategy for encouraging future growth through infill and redevelopment in areas with existing or planned transit investments. Growth under this alternative would be less likely to result in walkable, transit-oriented developments and therefore less conducive to transit use, biking, and walking. Thus, this alternative would likely result in a higher proportion of automobile trips and greater traffic congestion than development under the Draft General Plan. The higher proportion of automobile trips and greater traffic congestion would increase the amount of fuel (primarily gasoline but also diesel) consumption, which would result in greater greenhouse gas (GHG) emissions than the Draft General Plan.

In addition, the No Project alternative would not include the policies of the Draft General Plan to "reduce the City's carbon footprint "and to "develop and adopt new or amended regulations, programs and incentives as appropriate to implement the goals and policies set forth" related to climate change (CE-A.2), and to "regularly monitor, update, and implement the City's Climate Protection Action Plan (CE-A.13)." In addition, the No Project Alternative would not include the policy language from the Draft General Plan Land Use and Community Planning; Mobility; Urban Design; and Public Facilities, Services, and Safety elements related to sustainable land use patterns, alternative modes of transportation, energy efficiency, water supply, and GHG emissions associated with landfills. The Draft General Plan also calls for the City to employ sustainable building techniques, minimize energy use, maximize waste reduction and diversion, and implement water conservation measures. As a result, in addition to the increased GHG emissions associated with an increased proportion of automobile trips and greater traffic congestion, the No Project alternative could also result in greater GHG emissions associated with increased non-transportation related energy consumption (i.e., natural gas and electricity) due primarily to the design, orientation and energy efficiency of buildings, the amount of solid waste sent to a landfill, and energy associated with the delivery of water to users in the City.

Although the Draft General Plan includes policies that encourage the recycling of construction waste beyond the level that would occur under this alternative, it is not anticipated that the level of increased construction waste recycling and associated GHG emissions reductions would be substantially greater under the Draft General Plan than under this alternative. In addition, GHG emissions associated with the use of equipment and vehicles during construction activities under

this alternative would be similar to the Draft General Plan. Thus, GHG emissions associated with short-term construction activities under this alternative would be similar to the Draft General Plan. Nevertheless, implementation of this alternative would result in greater global warming impacts over the long-term due to increased GHG emissions associated with increased automobile trip and traffic congestion; increased energy consumption from buildings, increased storage and subsequent decomposition of solid waste in landfills, and increased energy consumption associated with water use when compared to the Draft General Plan.

Enhanced Sustainability

This alternative is analyzed as a means of further reducing the environmental effects of the Draft General Plan related to energy and water consumption, solid waste generation, water quality and air quality. It would likely take several years to develop and adopt new or amended regulations and programs to implement the mandatory policies of this alternative. Specifically, this alternative would add mandatory policies to the Draft General Plan to enhance the sustainability of future development within the plan area. These policies would include requirements for: builders/owners to employ sustainable building techniques (e.g., energy efficient design; landscaped "green" roofs; recycled building materials; renewable energy generation [e.g., solar panels]) in private developments; the installation of recycled water systems for large development projects; and reductions in water consumption associated with existing and future development in the plan area (e.g., landscaping associated with residential land uses, landscaping and fields within parks and open spaces, etc.). As discussed above, by adding similar policies aimed at achieving more sustainable development into the Draft General Plan and MMRP, and identifying Action Plan measures to implement these policies, the City has incorporated the principal objectives of the environmentally superior Enhanced Sustainability Alternative into the Draft General Plan.

Relationship to the Project Objectives

This alternative would meet all of the project objectives and is the environmentally superior alternative.

Environmental Effects

Agricultural Resources

The implementation of requirements for sustainable building techniques, recycled water systems, and reduced water consumption would result in similar impacts to agricultural resources when compared to the Draft General Plan. Please see **Section 3.1** for a discussion of agricultural resources impacts under the Draft General Plan.

Air Quality

The implementation of requirements for sustainable building techniques such as more energy efficient design, landscaped "green roofs" (which reflect solar radiation and cool the interior of buildings) and renewable energy production (i.e., installation of solar panels) would reduce the amount of nonrenewable energy consumed by new development within the plan area under this alternative. As long-term development occurs under this alternative, the prevalence of

sustainable buildings could significantly decrease the amount of air pollution associated with the burning of fossil fuels as consumption of nonrenewable energy decreases relative to long-term development under the Draft General Plan. Therefore, long-term development under the Enhanced Sustainability Alternative would result in reduced air quality impacts when compared to the Draft General Plan. However, by incorporating policies for sustainable building techniques such as more energy efficient design, landscaped "green roofs" (which reflect solar radiation and cool the interior of buildings) and renewable energy production (i.e., installation of solar panels) into the Draft General Plan and MMRP, and identifying Action Plan measures to implement these policies, the City has incorporated the principal objectives of the environmentally superior Enhanced Sustainability Alternative into the Draft General Plan. Therefore, this alternative would have similar impacts to air quality when compared to the Draft General Plan.

Biological Resources

The implementation of requirements for sustainable building techniques, recycled water systems, and reduced water consumption would result in similar impacts to biological resources when compared to the Draft General Plan. Please see **Section 3.3** for a discussion of biological resources impacts under the Draft General Plan.

Geologic Conditions

The implementation of requirements for sustainable building techniques, recycled water systems, and reduced water consumption would result in similar impacts associated with geologic conditions when compared to the Draft General Plan. Please see **Section 3.4** for a discussion of impacts associated with geologic conditions under the Draft General Plan.

Health and Safety

The implementation of requirements for sustainable building techniques, recycled water systems, and reduced water consumption would result in similar impacts to human health and safety when compared to the Draft General Plan. Please see **Section 3.5** for a discussion of human health and safety impacts under the Draft General Plan.

Historic Resources

The implementation of requirements for sustainable building techniques, recycled water systems, and reduced water consumption would result in similar impacts associated with historic resources when compared to the Draft General Plan. Please see **Section 3.6** for a discussion of historic resources impacts under the Draft General Plan.

Hydrology

The implementation of requirements for sustainable building techniques such as landscaped "green roofs" would absorb some rainwater that would otherwise drain into the storm water system. As long-term development occurs under this alternative, the prevalence of sustainable buildings within the plan area could significantly decrease the amount and rate of surface runoff and significantly increase absorption rates of runoff within the plan area relative to the Draft

General Plan. Therefore, long-term development under the Enhanced Sustainability Alternative would result in reduced hydrologic impacts when compared to the Draft General Plan. However, by incorporating policies for sustainable buildings and urban heat island mitigation, both of which could result in landscaped "green roofs" into the Draft General Plan and MMRP, and identifying Action Plan measures to implement these policies, the City has incorporated the principal objectives of the environmentally superior Enhanced Sustainability Alternative into the Draft General Plan.

Land Use

The implementation of requirements for sustainable building techniques, recycled water systems, and reduced water consumption would result in similar land use impacts when compared to the Draft General Plan. Please see **Section 3.8** for a discussion of land use impacts under the Draft General Plan.

Mineral Resources

The implementation of requirements for sustainable building techniques could result in greater reuse of building materials, thereby reducing the demand for raw mineral resources. Therefore, long-term development under the Enhanced Sustainability Alternative would result in fewer mineral resource impacts when compared to the Draft General Plan.

Noise

The implementation of requirements for sustainable building techniques, recycled water systems, and reduced water consumption would result in similar noise impacts when compared to the Draft General Plan. Please see **Section 3.10** for a discussion of noise impacts under the Draft General Plan.

Paleontological Resources

The implementation of requirements for sustainable building techniques, recycled water systems, and reduced water consumption would result in similar paleontological resources impacts when compared to the Draft General Plan. Please see **Section 3.11** for a discussion of paleontological resources impacts under the Draft General Plan.

Population and Housing

The implementation of requirements for sustainable building techniques, recycled water systems, and reduced water consumption would result in similar impacts associated with the displacement of people or housing units, necessitating the construction of replacement housing elsewhere, when compared to the Draft General Plan. Please see **Section 3.12** for a discussion of impacts associated with the displacement of people or housing units under the Draft General Plan.

Public Services and Facilities

The implementation of requirements for sustainable building techniques, recycled water systems, and reduced water consumption would result in similar impacts related to the construction of

new or physically-altered public services and facilities associated with police, fire, and schools when compared to the Draft General Plan. Please see **Section 3.13** for a discussion of impacts related to the construction of new or physically-altered public services and facilities under the Draft General Plan.

Public Utilities

The implementation of requirements for sustainable building techniques such as more energy efficient design, the use of recycled building materials, landscaped "green roofs" (which absorb rainwater and reflect solar radiation and cool the interior of buildings) and renewable energy production (i.e., installation of solar panels) as well as requirements for recycled water systems, and reduced water consumption would reduce the consumption of nonrenewable energy and water, and the generation of solid waste and storm water within the plan area under this alternative. As long-term development occurs under this alternative, the prevalence of sustainable buildings, recycled water systems, and continued implementation of requirements for reduced water consumption could significantly reduce the need for the construction of new or physically-altered public utilities infrastructure associated with water, energy, storm water and solid waste (i.e., landfills) and the associated potential construction-related environmental impacts relative to long-term development under the Draft General Plan. In addition, the consumption of available water supplies would be significantly reduced over the long term under this alternative when compared to the Draft General Plan.

Although the need for new or physically altered infrastructure associated with water and the environmental impacts thereof would significantly decrease over the long term, the construction of recycled water infrastructure could result in significant environmental impacts that would not occur under the Draft General Plan. Overall, the significantly reduced potential environmental impacts associated with reduced demand for new or physically altered energy, potable water, storm water and solid waste infrastructure, and the significantly reduced consumption of available water supplies would outweigh the potential significant environmental impacts associated with requirements for recycled water systems. Therefore, long-term development under the Enhanced Sustainability Alternative would result in fewer impacts associated with the construction of new or physically altered public utilities infrastructure when compared to the Draft General Plan. However, by incorporating policies for sustainable building techniques such as more energy efficient design, the use of recycled building materials, landscaped "green roofs" (which absorb rainwater and reflect solar radiation and cool the interior of buildings) and renewable energy production as well as policies addressing recycled water systems, and reduced water consumption into the Draft General Plan and MMRP, and identifying Action Plan measures to implement these policies, the City has incorporated the principal objectives of the environmentally superior Enhanced Sustainability Alternative into the Draft General Plan.

Transportation

The implementation of requirements for sustainable building techniques, recycled water systems, and reduced water consumption would not result in substantially different transportation-related impacts when compared to the Draft General Plan. Please see **Section 3.15** for a discussion of the transportation-related impacts that would occur under the Draft General Plan.

Visual Effects and Neighborhood Character

The implementation of requirements for sustainable building techniques, recycled water systems, and reduced water consumption would result in similar visual or neighborhood character impacts when compared to the Draft General Plan (see **Section 3.16**). Therefore, implementation of this alternative could result in similar visual effects impacts when compared to the Draft General Plan.

Water Quality

The implementation of requirements for sustainable building techniques such as landscaped "green" roofs would absorb some of the rainwater that would otherwise drain into the storm drain system and natural drainages. Storm water typically flushes anthropogenic pollutants that accumulate on paved surfaces and adjacent areas into the storm drain system and natural drainages, and eventually into the aquatic environment (i.e., lagoons, rivers, lakes and the ocean). The introduction of these pollutants into the aquatic environment can result in significant water quality impacts. As long-term development occurs under this alternative, the prevalence of "green" roofs could significantly reduce the amount of storm water and pollutants that enter the storm drain system and eventually the aquatic environment relative to the Draft General Plan. Therefore, long-term development under the Enhanced Sustainability Alternative would result in reduced water quality impacts when compared to the Draft General Plan. However, by incorporating policies for sustainable building techniques such as landscaped "green roofs" (which absorb rainwater) into the Draft General Plan and MMRP and identifying Action Plan measures to implement these policies, the City has incorporated the principal objectives of the environmentally superior Enhanced Sustainability Alternative into the Draft General Plan.

Global Warming

The implementation of requirements for sustainable building techniques such as more energy efficient design, landscaped "green roofs" (which reflect solar radiation and cool the interior of buildings) and renewable energy production would reduce the amount of nonrenewable energy consumed by new development within the plan area under this alternative. As long-term development occurs under this alternative, the prevalence of sustainable buildings could significantly decrease the amount of GHG emissions associated with the burning of fossil fuels as consumption of nonrenewable energy decreases relative to long-term development under the Draft General Plan. Therefore, long-term development under the Enhanced Sustainability Alternative would result in reduced global warming impacts when compared to the Draft General Plan.

But as explained previously, the City has incorporated policies for sustainable building techniques such as more energy efficient design, landscaped "green roofs"and renewable energy production into the Draft General Plan and MMRP, and measures to implement these policies into the Action Plan. By doing so the City has incorporated the principal environmental objectives of environmentally superior Enhanced Sustainability Alternative into the Draft General Plan.

Increased Parking Management

In reality no parking is free, and when the cost of parking is "bundled" with other costs it represents a subsidy to drivers and increases demand for parking over what it would be if the true cost were passed on directly to the user. Increased parking management supports local businesses by increasing on-street parking turnover and more effectively allocating parking resources. In addition, studies have shown that when direct parking costs increase, there is an associated increase in transit ridership and use of alternative modes of transportation.[2] Several tools exist to manage parking, some of which include: shared parking that serves multiple destinations; parking pricing/fees; parking meters; time limits; Community Parking Districts; permit parking districts; parking availability and cost information; and enforcement of time limits, garage use for vehicles instead of storage, and other parking restrictions.

This alternative expands upon the currently available parking management tools by expanding implementation of Community Parking Districts and residential permit parking districts throughout the City. This alternative would also increase parking meter fees and extend the hours of operation for existing parking meters. Full implementation of the parking management tools called for in this alternative would likely take several years. The Community Parking District program allows for direct investment and benefit of the parking management revenue generated within its boundaries, thus providing a source of revenue for community infrastructure and amenities. Permit parking districts address transient and spillover parking problems by restricting on-street parking to permit holders within a specified area. This alternative would substantially increase the management of on-street and other public parking facilities and could result in implementation of additional Community Parking Districts, increased time limits of on-street parking, greater use of shared parking, and additional public parking facilities. This alternative could result in reduced free on-street parking in the City, and increased hours of parking enforcement, thereby increasing the out-of-pocket consumer cost of parking. This would serve to reduce and/or eliminate a number of automobile trips, reduce parking demand, and increase the number of multimodal trips such as carpooling, transit, walking and biking. This alternative is analyzed as a means of further reducing the environmental effects of the Draft General Plan relating to air quality and traffic.

In response to comments made on the Draft General Plan during the public review period, the City has added Policy ME-G.5 to the Mobility Element to "implement parking strategies that are designed to help reduce the number and length of automobile trips …" By adding this policy into the Draft General Plan and MMRP, and identifying Action Plan measures to implement this policy, the City has incorporated one of the principal environmental objectives related to the Increased Parking Management Alternative into the Draft General Plan.

Relationship to the Project Objectives

This alternative would meet all of the project objectives and is an environmentally superior alternative.

[2] United States Environmental Protection Agency. *Parking Alternatives: Making Way for Urban Infill and Brownfield Redevelopment.* December 1999

Environmental Effects

Agricultural Resources

Implementation of this alternative would result in similar agricultural resources impacts compared to the Draft General Plan. Please see **Section 3.1** for a discussion of agricultural resources impacts under the Draft General Plan

Air Quality

The increased parking management alternative would substantially reduce free on-street parking in the City, increase parking meter fees and enforcement hours, thereby increasing the cost of parking. This would serve to reduce the number of automobile trips and vehicle miles traveled as some trips would be replaced by alternative modes of travel such as carpooling, transit, walking and biking. A reduction in vehicular trips would thereby reduce emissions associated with vehicular use. This alternative would have similar impacts related to construction emissions associated with implementing the Draft General Plan. Overall, the increased parking management alternative would result in reduced air quality impacts than development under the Draft General Plan. However, by incorporating Policy ME-G.5 to the Mobility Element to "implement parking strategies that are designed to help reduce the number and length of automobile trips …" into the Draft General Plan and MMRP, and identifying Action Plan measures to implement this policy, the City has incorporated one of the principal environmental objectives related to the Increased Parking Management Alternative into the Draft General Plan.

Biological Resources

Implementation of this alternative would result in similar biological resources impacts compared to the Draft General Plan. Please see **Section 3.3** for a discussion of biological resources impacts under the Draft General Plan.

Geologic Conditions

Implementation of this alternative would result in similar impacts to geologic conditions compared to the Draft General Plan. Please see **Section 3.4** for a discussion of impacts associated with geologic conditions under the Draft General Plan.

Health and Safety

Implementation of this alternative would result in similar health and safety impacts compared to the Draft General Plan Please see **Section 3.5** for a discussion of impacts associated with geologic conditions under the Draft General Plan.

Historic Resources

Implementation of this alternative would result in similar historic resources impacts compared to the Draft General Plan. . Please see **Section 3.6** for a discussion of impacts associated with historic resources under the Draft General Plan.

Hydrology

Implementation of this alternative would result in similar hydrology impacts compared to the Draft General Plan. Please see **Section 3.7** for a discussion of impacts associated with hydrology under the Draft General Plan.

Land Use

Implementation of this alternative would result in similar land use compared to the Draft General Plan. Please see **Section 3.8** for a discussion of impacts associated with land use under the Draft General Plan

Mineral Resources

Implementation of this alternative would result in similar mineral resource impacts compared to the Draft General Plan. Please see **Section 3.9** for a discussion of impacts associated with mineral resources under the Draft General Plan.

Noise

Implementation of this alternative would result in similar noise impacts compared to the Draft General Plan. Please see **Section 3.10** for a discussion of impacts associated with noise under the Draft General Plan.

Paleontological Resources

The implementation of requirements for increased parking management would not result in substantially different impacts associated with paleontological resources than would occur under the Draft General Plan. Please see **Section 3.11** for a discussion of impacts associated with paleontological resources under the Draft General Plan. Implementation of this alternative would result in similar paleontological resource impacts compared to the Draft General Plan.

Population and Housing

Implementation of this alternative would result in similar population and housing impacts compared to the Draft General Plan Please see **Section 3.12** for a discussion of impacts associated with population and housing under the Draft General Plan. .

Public Services and Facilities

Implementation of this alternative would result in similar public services and facilities impacts compared to the Draft General Plan. . Please see **Section 3.13** for a discussion of impacts associated with public services and facilities under the Draft General Plan.

Public Utilities

Implementation of this alternative would result in similar public utilities impacts compared to the Draft General Plan. Please see **Section 3.14** for a discussion of impacts associated with public utilities under the Draft General Plan.

Transportation

The increased parking management alternative would substantially reduce free on-street parking in the City, increase parking meter fees and enforcement hours thereby increasing the cost of parking. This would serve to reduce the number of automobile trips, reduce parking demand, and increase the number of multi-modal trips such as carpooling, transit, walking and biking. Therefore, the increased parking management alternative would result in reduced vehicular transportation impacts than development under the Draft General Plan.

Visual Effects and Neighborhood Character

Implementation of this alternative would result in similar visual effects and neighborhood character impacts compared to the Draft General Plan. Please see **Section 3.14** for a discussion of impacts associated with visual effects and neighborhood character under the Draft General Plan.

Water Quality

Implementation of this alternative would result in similar water quality impacts compared to the Draft General Plan. Please see **Section 3.17** for a discussion of impacts associated with water quality under the Draft General Plan.

Global Warming

The increased parking management alternative would substantially increase the management of on-street and other public parking facilities in the City, thereby increasing the cost of parking. This would serve to reduce the number of automobile trips and vehicle miles traveled as some trips would be replaced by alternative modes of travel such as carpooling, transit, walking and biking. A reduction in vehicular trips would thereby reduce GHG emissions associated with vehicle miles traveled. This alternative would have similar GHG emissions associated with construction activities when compared to the Draft General Plan. Overall, the increased parking management alternative would result in reduced global warming impacts than development under the Draft General Plan. But as explained previously, the City has incorporated Policy ME-G.5 to "implement parking strategies that are designed to help reduce the number and length of automobile trips …" into the Draft General Plan and MMRP, and measures to implement these policies into the Action Plan. By doing so the City has incorporated one of the principal environmental objectives related to the Increased Parking Management Alternative into the Draft General Plan.

Concentrated Growth

This alternative is analyzed within this Program EIR as a means to focus projected growth into four subareas of the City that are served by high quality transit. Environmental impacts would be greater in these four subareas, but would likely decrease in other areas of the City. Under this alternative, infill and redevelopment would be focused in the Downtown San Diego and Uptown communities; and in Urban Village Centers within the Mission Valley/Morena/Grantville, University/Sorrento Mesa, and Midway-Pacific Highway subareas to a greater extent than is envisioned under the Draft General Plan. In addition, under this alternative, higher density infill and redevelopment would be discouraged in Neighborhood/Community Villages and within Transit Corridors outside of the above-referenced subareas. Due to the high cost of land and the scarcity of vacant developable land in the four subareas, it would be more difficult to secure the population-based park lands needed to provide public facilities in accordance with General Plan, as compared to the Draft General Plan.

Relationship to the Project Objectives

This alternative would meet or partially meet most of the project objectives (see **Section 7.2**). Objectives Numbers 1, 2, 4, 7, 9, and 10 would be met. It would only partially implement project objective Number 3, as there would be more concentrated growth in fewer communities. Objective Number 5 could potentially be met, but would reduce the transit connectivity among communities as fewer communities would have villages, and may require some redesign of the regional transportation network to add more capacity to the concentrated growth areas. Objective Number 6 would be difficult to implement in the concentrated growth communities, and Objective Number 8 would not be met.

Environmental Effects

Agricultural Resources

The implementation of the Concentrated Growth Alternative would result in similar impacts to agricultural resources than would occur under the Draft General Plan because the alternative and the Draft General Plan both encourage infill and redevelopment to meet future needs, and both provide policy protections for agricultural lands. Please see **Section 3.1** for a discussion of agricultural resources impacts under the Draft General Plan.

Air Quality

The Concentrated Growth alternative would increase densities in areas that are served by some of the most substantial transit capital investments in the region. This alternative would likely serve to increase transit trips to and from these four subareas. In addition, the higher intensities within these areas there would likely result in an increase in walking and the use of alternative modes for internal, local trips. A reduction in vehicular trips would thereby reduce emissions associated with vehicular use. However, there would likely be increased localized air quality impacts at busy intersections within the concentrated growth areas. In addition, some of the citywide air quality benefits may be reduced if transit service in other areas of the city is scaled back due to insufficient densities to make improved transit service cost-effective. This alternative would have similar impacts related to construction emissions associated with

implementing the Draft General Plan. Overall, the concentrated growth alternative is expected to result in similar air quality impacts than development under the Draft General Plan.

Biological Resources

The implementation of requirements for concentrated growth would result in similar impacts to biological resources than would occur under the Draft General Plan because the alternative and the Draft General Plan both encourage infill and redevelopment to meet future needs, and both provide policy protections for biological resources. See Section 3.3 for a discussion of biological resources impacts under the Draft General Plan.

Geologic Conditions

Implementation of the Concentrated Growth Alternative would not substantially alter the City's projected population growth or housing unit increase. However, it would result in greater concentrations of people living in areas identified as a "Moderate to High" or "Low to Moderate" geo-technical relative risk areas(see **Figure 3.4-1**). As a result, this alternative could result in the exposure of a substantially greater number people or property to geologic hazards such as groundshaking, fault rupture, landslides and others.

The development of structures and impervious surfaces and the removal of vegetative cover on undeveloped lands generally increase the potential for wind and water erosion of soils. Since the pressure to develop the City's remaining vacant land would not be substantially different as the population increases and the City plans for its share of regional housing needs as required by state law, the potential for wind and water erosion of soils would not change.

Compliance with local, state, and federal regulations associated with seismic risks and other geologic hazards would not be substantially different under this alternative. However, due to greater numbers of people and property potentially being located in Moderate or High Risk Geo-technical Relative Risk Areas, implementation of this alternative would result in greater impacts associated with geologic conditions when compared to the Draft General Plan.

Health and Safety

Implementation of existing local, state, and federal regulations would ensure that the exposure of people or sensitive receptors to potential health hazards associated with hazardous materials does not change substantially under this alternative. In addition, due to climate, topography, and native vegetation, some of the City's new and existing development will be subject to wildland fires under this alternative, though the impacts would be similar to the Draft General Plan.

Under this alternative increased intensity would be expected to occur in Mission Valley, which would result in an incremental increase in the number of people living in a flood prone area. However, similar to the Draft General Plan, the impacts to heath and safety would be reduced to a less than significant level by new development's adherence to local, state and federal floodplain regulations. Still, due to the increase concentration of people in flood prone areas, this alternative is expected to result in greater health and safety impacts than the Draft General Plan.

Historic Resources

The implementation of the Concentrated Growth Alternative would result in greater impacts associated with historic resources than would occur under the Draft General Plan. Both the alternative and the Draft General Plan encourage infill and redevelopment and both provide policy protections for historical resources. However, since areas impacted by development under this alternative are located in areas of high sensitivity for historical resources, it is anticipated the impacts to historic resources would be greater. Please see **Section 3.6** for a discussion of impacts associated with historic resources under the Draft General Plan

Hydrology

The implementation of the Concentrated Growth Alternative would result in similar impacts associated with hydrology than would occur under the Draft General Plan because the alternative and the Draft General Plan both encourage infill and redevelopment to meet future needs, and both provide policy protections for hydrological resources. Please see **Section 3.7** for a discussion of impacts associated with hydrology under the Draft General Plan.

Land Use

Development under the Concentrated Growth Alternative would comply with the mandatory policies of any adopted environmental plans, policies or regulations of any state or federal agency, including applicable habitat conservation plans as well as adopted Airport Land Use Compatibility Plans. Therefore, development under this alternative would not result in substantially different impacts associated with adopted Airport Land Use Compatibility Plans or with adopted environmental plans.

However, development under the Concentrated Growth Alternative would increase densities over what is permitted in existing community plans within the four subareas where growth is to be concentrated. This alternative would also be contrary to existing community plan land use recommendations that call for the development of compact, mixed-use centers in other communities (communities outside of the four subareas).

The Concentrated Growth Alternative as well as the Draft General Plan would follow policies that encourage infill and redevelopment, and minimize the potential for associated land use incompatibilities. However, overall the secondary environmental impacts associated with this alternative would result in greater land use impacts when compared to the Draft General Plan.

Mineral Resources

Impacts to mineral resources occur when access to resources is restricted or prohibited through development of lands containing the resources or when incompatible land uses are developed in close proximity thereby reducing the likelihood for extraction of those resources. However, due to the limited supply of such resources in the City, mandatory compliance with existing local, state, and federal regulations protecting valuable mineral resources it is anticipated that implementation of this alternative would result in similar impacts to mineral resources when compared to the Draft General Plan.

Noise

The plan area is an existing highly urbanized environment with ambient sources of noise including vehicular traffic, buses, trucks, trains, aircraft and various stationary sources such as industrial and entertainment land uses. Since this alternative would not substantially alter the projected population growth and level of economic activity within the plan area, the amount of noise generated by the sources described above would not change substantially under this alternative when compared to the Draft General Plan but would be greater in areas of concentrated growth but less in other areas. In addition, the amount of construction activity and related short-term noise impacts would not change substantially but would be greater in areas of concentrated growth but less in other areas. Development under this alternative would comply with the land use compatibility policies of adopted Comprehensive Land Use Plans for airports within and near the plan area. Impacts associated with the exposure of sensitive receptors to aircraft noise would be similar when compared to the Draft General Plan. Overall, it is anticipated that noise impacts would be similar when compared to the Draft General Plan.

Paleontological Resources

Mass grading, excavation, construction of utility infrastructure and other activities associated with development could impact paleontological resource resources when such development is located on sensitive geologic formations. It is anticipated that impacts to paleontological resources would be greater in areas of concentrated growth due to the depth of excavation required for such development but lesser in other areas. Land development regulations would not provide protection for paleontological resources under this alternative or under the Draft General Plan. However, impacts to such resources would be identified and protected through the environmental review process for discretionary projects under both this alternative and the Draft General Plan. Overall, implementation of this alternative would result in similar paleontological resources impacts when compared to the Draft General Plan.

Population and Housing

Infill and redevelopment can lead to displacement of residents as existing housing units are demolished or replaced with generally more expensive housing units. As areas redevelop, older housing units, and in some cases more affordable housing units, will be replaced by higher cost housing units. Low-income households are most likely to be adversely affected. This could result in displacement and relocation of people away from the City and the region in search of more affordable housing. Displacement could necessitate construction of some replacement housing in the City and/or region. The displacement of people is considered a social and economic impact, but not a physical CEQA impact. The construction of replacement housing has the potential to result in physical environmental impacts. However, because this alternative would result in less land area being targeted for infill and redevelopment as compared to the Draft General Plan, there would be fewer older housing units affected, and reduced construction impacts to provide replacement housing.

Therefore, implementation of this alternative would result in fewer impacts associated with displacement of substantial numbers of people and housing when compared to the Draft General Plan.

Public Services and Facilities

As previously discussed, many of the City's older, urbanized communities include deficient levels of public services, facilities and utilities, and/or older facilities and infrastructure in need of replacement. Development under this alternative and the Draft General Plan would result in a sizeable amount of future growth occurring through infill and redevelopment. Additional growth within the urbanized communities would likely require the construction of new or physically altered public facilities and utilities, the construction of which could result in environmental impacts.

Since this alternative would result in more focused infill and redevelopment when compared to the Draft General Plan, impacts associated with the construction of new or physically altered public facilities and utilities would likely be increased in the areas of concentrated growth, but reduced in other areas of the city. Overall, it is expected that implementation of this alternative would result in similar public facilities construction impacts when compared to the Draft General Plan.

Public Utilities

Implementation of this alternative would result in similar public utilities impacts compared to the Draft General Plan. Please see **Section 3.14** for a discussion of impacts associated with public utilities under the Draft General Plan.

Transportation/Traffic/Circulation/Parking

Growth under this alternative would result in walkable, transit-oriented developments in limited areas of the City. As a result, the Concentrated Growth Alternative would likely result in decreased automobile trips and increased multi-modal trips (i.e., transit, biking, and walking) in the concentrated growth areas, and could decrease multi-modal trips in other areas of the City where village and transit corridor development would not be realized. In addition, parking supply would likely be more limited in the four subareas as compared to the rest of the City.

Both the Draft General Plan and this alternative are projected to result in increased automobile trips as a result of population growth. This increase in automobile trips to the planned transportation network would increase the number of roadway miles and the percentage of daily vehicle miles traveled at Level of Service E or F. This alternative may cause a shift in types of trips that occur in the four concentrated growth subareas as compared to the rest of the City, while the numbers and types of projected trips should not substantially change over the Draft General Plan. However, it is anticipated that implementation of this alternative would result in greater impacts in areas of concentrated growth and but reduced impacts in other areas compared to the Draft General Plan. Overall, the impacts associated with this alternative would be similar compared to the General Plan.

Visual Effects and Neighborhood Character

The implementation of the Concentrated Growth Alternative could result in increased visual and neighborhood character impacts in areas where growth is to be concentrated, and reduced impacts to other areas of the City, when compared to the Draft General Plan. In the areas of

concentrated growth, visual effects and neighborhood character impacts would be reduced by adherence to existing policies, programs and project review procedures. In addition, this alternative would be subject to Draft General Plan policies that call for infill and redevelopment to be compatible with existing community character.

Existing City policies would continue to address potential impacts to topography, ground surface relief features and public views from designated open space areas, scenic highways or to any significant visual landmarks or scenic vistas (e.g., mountains, bays, rivers, and the ocean). Therefore, impacts to public views or scenic vistas would be similar when compared to the Draft General Plan. Overall, impacts to visual effects and neighborhood character with this alternative would be similar compared to the Draft General Plan.

Water Quality

The implementation of the Concentrated Growth Alternative would result in similar impacts associated with water quality than would occur under the Draft General Plan. Please see **Section 3.17** for a discussion of impacts associated with water quality under the Draft General Plan. Implementation of this alternative would result in similar water quality impacts compared to the Draft General Plan.

Global Warming

As previously discussed, the Concentrated Growth alternative would increase densities in areas that are served by some of the most substantial transit capital investments in the region. This alternative would likely serve to increase transit trips to and from these four subareas. In addition, the higher intensities within these areas would likely result in an increase in transit usage, and in walking and biking for internal, local trips. A reduction in vehicular trips would reduce GHG emissions associated with vehicle miles traveled. However, if transit service is scaled back in Neighborhood/Community Villages and Transit Corridors where growth is discouraged due to insufficient densities to make such service cost-effective, the GHG emissions reductions associated with reduced VMT in the concentrated growth areas may be offset by increased GHG emissions associated with increased VMT in areas where growth is discouraged. Furthermore, the Draft General Plan would focus growth into compact, mixed use walkable communities served by transit throughout the City, which would reduce the length and number of automobile trips and increase the number of transit, walking and biking trips throughout the City, including the areas targeted for concentrated growth under this alternative.

Under the Concentrated Growth Alternative, the reductions in the length and number of automobile trips and increases in the number of transit, walking and biking trips would only be anticipated to occur in the concentrated growth areas; reductions in the length and number of automobile trips and increases in the number of transit, walking and biking trips would not be anticipated to occur in the areas where growth is discouraged since such areas generally lack the densities and infrastructure to support increases in the number of alternative transportation trips. The level of GHG emissions associated with energy consumption in buildings under this alternative would be similar to the level under the Draft General Plan. This alternative would also have similar impacts related to GHG emissions from construction activities when compared to the Draft General Plan. The concentrated growth alternative would result in similar levels of transportation-related GHG emissions in the areas targeted for concentrated growth when compared to the transportation-related GHG emissions of these areas under the Draft General

Plan, and higher levels of transportation-related GHG emissions in the Neighborhood/Community Villages and Transit Corridors where growth is discouraged and other areas of the City. Overall, the concentrated growth alternative is expected to result in greater global warming impacts than the Draft General Plan.

7.4 Environmentally Superior Alternative

An EIR is required to identify the environmentally superior alternative from among the range of reasonable alternatives that are evaluated. State CEQA Guidelines §15126.6(d)(2) states that if the environmentally superior alternative is the no project alternative, the EIR shall also identify an environmentally superior alternative from among the other alternatives. The environmental effects of the four alternatives analyzed in Section 7.3.2 are compared with the Draft General Plan on **Table 7.4-1** and summarized below. As the table shows, the Enhanced Sustainability Alternative would be environmentally superior to the Draft General Plan. But as explained previously, the City has undertaken actions to reduce the GHG emissions of future development under the Draft General Plan by expanding and strengthening the climate change policies of the Draft General Plan and MMRP, and identifying Action Plan measures to implement these policies. By taking these actions, the City has incorporated the principal environmental objectives of the Enhanced Sustainability Alternative into the Draft General Plan. Furthermore, the addition of Policy ME-G.5 to the Mobility Element to "implement parking strategies that are designed to help reduce the number and length of automobile trips …" implements the principal environmental objective related to the Increased Parking Management Alternative.

Table 7.4-1
Comparison of Impacts by Alternative to the Draft General Plan

Impact	Proposed Project	No Project/ Existing Plans Alternative	Enhanced Sustainability Alternative	Increased Parking Management Alternative	Concentrated Growth Alternative
Agricultural Resources	Significant and unavoidable	Similar	Similar	Similar	Similar
Air Quality	Significant and unavoidable	Greater	Less	Less	Similar
Biological Resources	Significant and unavoidable	Similar	Similar	Similar	Similar
Geologic Conditions	Significant and unavoidable	Similar	Similar	Similar	Greater
Health and Safety	Significant and unavoidable	Similar	Similar	Similar	Greater
Historic Resources	Significant and unavoidable	Similar	Similar	Similar	Greater
Hydrology	Significant and unavoidable	Similar	Less	Similar	Similar
Land Use	Significant and unavoidable	Greater	Similar	Similar	Greater
Mineral Resources	Significant and unavoidable	Similar	Less	Similar	Similar
Noise	Significant and unavoidable	Similar	Similar	Similar	Similar
Paleontological Resources	Significant and unavoidable	Similar	Similar	Similar	Similar
Population and Housing	Significant and unavoidable	Similar	Similar	Similar	Less
Public Services and Facilities	Significant and unavoidable	Similar	Similar	Similar	Similar
Public Utilities	Significant and unavoidable	Similar	Less	Similar	Similar
Traffic	Significant and unavoidable	Greater	Similar	Less	Similar
Visual Effects and Neighborhood Character	Significant and unavoidable	Similar	Similar	Similar	Similar
Water Quality	Significant and unavoidable	Similar	Less	Similar	Similar
Global Warming	Significant and unavoidable	Greater	Less	Less	Greater