

## **8 PROJECT ALTERNATIVES**

### **8.1 INTRODUCTION**

To fully evaluate the environmental effects of projects, the California Environmental Quality Act (CEQA) mandates that alternatives to the project be analyzed. Section 15126.6 of the CEQA Guidelines requires the discussion of “a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project” and the evaluation of the comparative merits of the alternatives. The alternatives discussion is intended to “focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project,” even if these alternatives would impede to some degree the attainment of the project objectives.

For this Supplemental Environmental Impact Report (SPEIR), alternatives selected for consideration may include Alternatives Considered but Rejected; the No Project (Adopted General Plan) Alternative; the Alternate Project Location Alternative; and an Environmentally Superior Alternative. A comparison of the residential, commercial, and industrial square footage projected to be developed under each alternative is provided in Table 8.3-1. CEQA does not require an environmental impact report (EIR) to consider every conceivable alternative to a project; however, the Lead Agency must consider a reasonable range of potentially feasible alternatives.

### **8.2 ALTERNATIVES CONSIDERED BUT REJECTED**

Various sites (“Study Areas,” per Appendix 13.C.13) throughout the Planning Area were considered for inclusion in each Focus Area. The following subsections describe the nature of each site and reasons for rejection of each alternative Study Area.

#### **8.2.1 TODO - Study Area 2: Hoover Avenue**

Study Area 2 is a 26.3-acre area currently zoned as Light Industrial (IL) that generally includes the Southport Business Center. Under the adopted zoning, no residential uses are allowed and the maximum allowed height for development is three stories or 35 feet. Due to the proximity of this site to the 24th Street Transit Center and the recommendations of the 24th Street Transit Oriented Development Overlay (TODO) Study, Study Area 2 was evaluated for the application of a mixed-use overlay (24 dwelling units per acre) that would allow mixed-use development up to a height of five stories/65 feet.

Community members and environmental stakeholder organizations raised concerns regarding the creation of potential new land use incompatibilities by allowing the co-location of light industrial and residential uses. Due to this feedback, Study Area 2 was dropped from inclusion in the Focused General Plan Update (FGPU).

#### **8.2.2 TODO - Study Area 3: Mile of Cars Way**

Study Area 3 is an 11.3-acre area that includes a variety of automobile dealerships generally at the intersection of National City Boulevard and Mile of Cars Way. This area is currently zoned Commercial Automotive (CA), and no residential uses are allowed. The maximum allowed height is three stories or 50 feet. Study Area 3 was evaluated based on the recommendations of the TODO Study.

While Study Area 3 is near the 24th Street Transit Center, no changes are proposed at this time due to concerns with co-locating residential uses with existing automobile-oriented uses. Therefore, Study Area 3 was dropped from inclusion in the FGPU.

### **8.2.3 TODO - Study Area 4A: National City Boulevard (Sub-Area)**

Study Area 4A is a 13.7-acre area that includes a variety of new and used car dealerships generally along National City Boulevard that is bounded by 18th Street, Roosevelt Avenue, 22nd Street, and A Avenue. This area is currently zoned Commercial Automotive (CA), and no residential uses are allowed. The maximum allowed height is three stories, or 50 feet. Study Area 4A was evaluated based on the recommendations of the TODO Study.

While Study Area 4A is near the 24th Street Transit Center, no changes are proposed at this time due to concerns with co-locating residential uses with existing automobile-oriented uses. Therefore, Study Area 4A was dropped from inclusion in the FGPU.

### **8.2.4 TODO - Study Area 4B: National City Boulevard (Sub-Area)**

Study Area 4B is A 16.4-acre area that includes a variety of car dealerships, warehouses, and commercial uses that is generally bounded by 24th Street, National City Boulevard, and A Avenue. This area is currently zoned Light Industrial (IL) and Service Commercial (CS), and no residential uses are allowed. The maximum allowed height ranges between 35 and 50 feet, or three stories. Study Area 4B was evaluated based on the recommendations of the TODO Study.

While Study Area 4B is near the 24th Street Transit Center, no changes are proposed at this time due to concerns with co-locating residential uses with existing automobile-oriented uses. Therefore, Study Area 4B was dropped from inclusion in the FGPU.

### **8.2.5 TODO - Study Areas 5A and 5B: Highland Avenue**

Study Areas 5A and 5B includes a variety of automobile-oriented, commercial, and residential uses generally along Highland Avenue. Sub-Area 5A (1.5 acres) is generally located at the intersection of 18th Street and Highland Avenue, and Sub-Area 5B (3.2 acres) is generally located at the intersection of 24th Street and Highland Avenue. This area is currently zoned Major Mixed Use Corridor(MXC-2), Minor Mixed Use Corridor (MXC-1), and Very High Density Multi-Unit Residential (RM-3), which allow for densities of up to 75, 48, and 75 dwelling units per acre, respectively. The maximum height ranges from three to nine stories and 65 to 95 feet. Study Areas 5A and 5B were evaluated based on the recommendations of the TODO Study.

Study Areas 5A and 5B are within a Transit Priority Area and nearby various services and amenities. The current zone and density, however, have the capacity to accommodate higher-intensity development. No changes are proposed at this time.

## **8.3 ALTERNATIVES FULLY ANALYZED**

The No Project (Adopted General Plan) Alternative and the Alternate Project Location Alternative were fully analyzed for this Supplemental Environmental Impact Report (SPEIR). For purposes of this alternatives discussion, the FGPU will be referred to as the “Proposed Project.” A comparison of the number of residential units, commercial development, and industrial development that would occur at buildout under each alternative and the Proposed Project is provided in Table 8.3-1. Table 8.3-2 also details buildout comparisons for the two alternatives above and beyond what is allowed in the Adopted General Plan.

As required under section 15126.6 (e)(2) of the CEQA Guidelines, an EIR must identify the Environmentally Superior Alternative. Pursuant to the CEQA Guidelines, if the No Project Alternative is determined to be the most environmentally superior project, then another alternative among the alternatives evaluated must be identified as the environmentally superior project. Section 8.5 addresses the Environmentally Superior Alternative selected for this SPEIR.

**Table 8.3-1 Buildout Comparison – Totals**

Alternative	Net New Projected Buildout 2050			
	Population	Dwelling Units	Commercial (square feet)	Industrial (square feet)
FGPU (Proposed Project)	74,872	23,325	13.3 million	5.8 million
No Project Alternative <sup>(1)</sup>	72,961	22,729	13.1 million	5.8 million
Alternate Project Location Alternative	75,251	23,425	13.2 million	5.8 million

Source: See Appendix 13.B.12 FGPU Buildout Projections.  
 Note:  
 (1) National City Comprehensive Land Use Update, Draft EIR, Table 3-2 Projected 2030 Buildout, 2011. <https://www.nationalcityca.gov/home/showpublisheddocument/4460/636090627169130000>; WSP extrapolated rates to determine a 2050 year equivalent.

**Table 8.3-2 Buildout Comparison – Differences as Compared to No Project (Adopted Plan)**

Alternative	Net New Projected Buildout			
	Population	Dwelling Units	Commercial (square feet)	Industrial (square feet)
FGPU (Proposed Project)	(+)1,911	(+)595	(+)198,688	(0)
Alternate Project Location Alternative	(+)2,291	(+)696	(+)110,983	(0)

Source: See Appendix 13.B.12 FGPU Buildout Projections. National City Comprehensive Land Use Update, Draft EIR, Table 3-2 Projected 2030 Buildout, 2011. <https://www.nationalcityca.gov/home/showpublisheddocument/4460/636090627169130000>; WSP extrapolated rates to determine a 2050 year equivalent.

### 8.3.1 No Project (Adopted Plan) Alternative

#### 8.3.1.1 Description

The following discussion of the No Project Alternative (Adopted Plan) is based on the CEQA Guidelines section 15126.6(e)(3)(A) which states:

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

Consistent with CEQA Guidelines section 15126.6(e)(3)(A), the No Project Alternative represents the continued implementation of the adopted 2011 Comprehensive Land Use Update (CLUU), including all subsequent General Plan and zoning amendments, which would continue to guide development throughout the City through implementation of the policies and regulations. The Westside Specific Plan and Downtown Specific Plan would continue to be implemented through the policies of each. It is noted that the CLUU focused on reinvestment in existing neighborhoods and directing additional

development and redevelopment near transit stations, within urban and community centers, and along transit corridors. The existing zoning for the project areas is shown on Figure 8.3-1.

The new dwelling units, retail/office, and industrial facilities would replace existing buildings. Areas of change would occur mainly in the mixed-use zones, including those identified in the Westside Specific Plan and Downtown Specific Plan areas, as identified in the land use map in the 2011 CLUU Program Environmental Impact Report (PEIR). The 2011 CLUU PEIR describes substantial growth as a result of the CLUU being attributed predominantly to the change from single-use commercial to mixed-use with the addition of high-density residential use. Existing and proposed single-family residential areas are unlikely to be affected.

### **8.3.1.2 Objectives**

The No Project Alternative would meet the following objectives of the Proposed Project:

- Encourage smart growth that is consistent with statewide and regional transportation and planning goals.
- Establish a universally accessible, safe, comprehensive, and integrated pedestrian and bicycle system.
- Create a framework for a mix of land uses, including residential, commercial, employment, service, agricultural, open space, and recreational uses that accommodate the needs of persons from all income groups and age levels.
- Encourage the development of complete neighborhoods that meet the community's needs for sustainable and high-quality living environments.
- Develop effective plans, codes, resolutions, ordinances, and zoning to implement the General Plan.
- Develop a safe and efficient system for the movement of goods that supports commerce while enhancing the livability of the community.

The No Project Alternative would not fully address the following objectives of the Proposed Project:

- Update the City's General Plan to integrate new State legislation and other regional and local regulatory changes into the City's policies and programs.
  - The No Project Alternative would not update the General Plan to integrate new State legislation that has been adopted since 2011.
- Develop a comprehensive circulation system that is safe and efficient for all modes of travel and that is coordinated with the regional system.
  - The No Project Alternative would not update the circulation system with the latest Regional Transportation Plan/Sustainable Communities Strategy update, 2021 San Diego Forward Regional Plan.
- Reduce greenhouse gas (GHG) emissions resulting from local government and community-wide activities within the City.
  - The No Project Alternative would reduce GHG emissions, but as it was developed in 2011, the current adopted Climate Action Plan (CAP) would not maintain consistency with the State legislation adopted since then, which sets new GHG reduction goals (see Table CAP-1 Regulatory Framework in the 2022 CAP).

## 8.3.2 Alternate Project Location Alternative

### 8.3.2.1 Description

The Alternative Project Location Alternative would include all the same components as the Proposed Project: updates to the Land Use, Transportation, and Safety Elements and CAP, along with code and Specific Plan amendments. The sole difference between this alternative and the Proposed Project pertains to one Focus Area: the exclusion of the 24th Street Transit Station. This alternative would relocate density from the 24th Street Transit Station to a set of parcels (“Alternative Site”), which would be rezoned to High Density Multi-Unit Residential (RM-2) (see Figure 8.3-1 and Figure 8.3-2, outlined in blue). The Alternative Site is composed of a set of parcels between A Avenue, E 26th Street, E 27th Street, and D Avenue. Under the Alternative Site Alternative, the City would net an additional 119 dwelling units as compared to the Proposed Project, but would see a reduction of 87,705 square feet of commercial space. This reduction would stem from this location being rezoned from commercial uses to RM-2, which is purely residential.

The Alternative Site was selected as a replacement for the 24th Street Transit Station Focus Area to reduce potential air quality and noise impacts to residential uses near the Interstate 5 (I-5) corridor. The Alternative Site is located approximately 2,400 feet (0.4 miles) from the I-5 corridor (as the crow flies), as compared to the 24th Street Transit Station Focus Area, which is approximately less than 200 feet from the edge of parcel to the nearest off-ramp (as the crow flies).

### 8.3.2.2 Objectives

The Alternate Location Alternative would meet all of the objectives of the Proposed Project, as the differences between the two are minor, as follows.

- Update the City’s General Plan to integrate new State legislation and other regional and local regulatory changes into the City’s policies and programs.
- Encourage smart growth that is consistent with statewide and regional transportation and planning goals.
- Create a framework for a mix of land uses, including residential, commercial, employment, service, agricultural, open space, and recreational uses that accommodate the needs of persons from all income groups and age levels.
- Encourage the development of complete neighborhoods that meet the community’s needs for sustainable and high-quality living environments.
- Develop effective plans, codes, resolutions, ordinances, and zoning to implement the General Plan.
- Establish a universally accessible, safe, comprehensive, and integrated pedestrian and bicycle system.
- Develop a comprehensive circulation system that is safe and efficient for all modes of travel that is coordinated with the regional system.
- Provide and manage parking in a way that balances economic development, livable neighborhoods, environmental health, and public safety with a compact, multi-modal environment.
- Develop a safe and efficient system for the movement of goods that supports commerce while enhancing the livability of the community.
- Reduce GHG emissions resulting from local government and community-wide activities within the City.

Figure 8.3-1 No Project Alternative Zoning Map

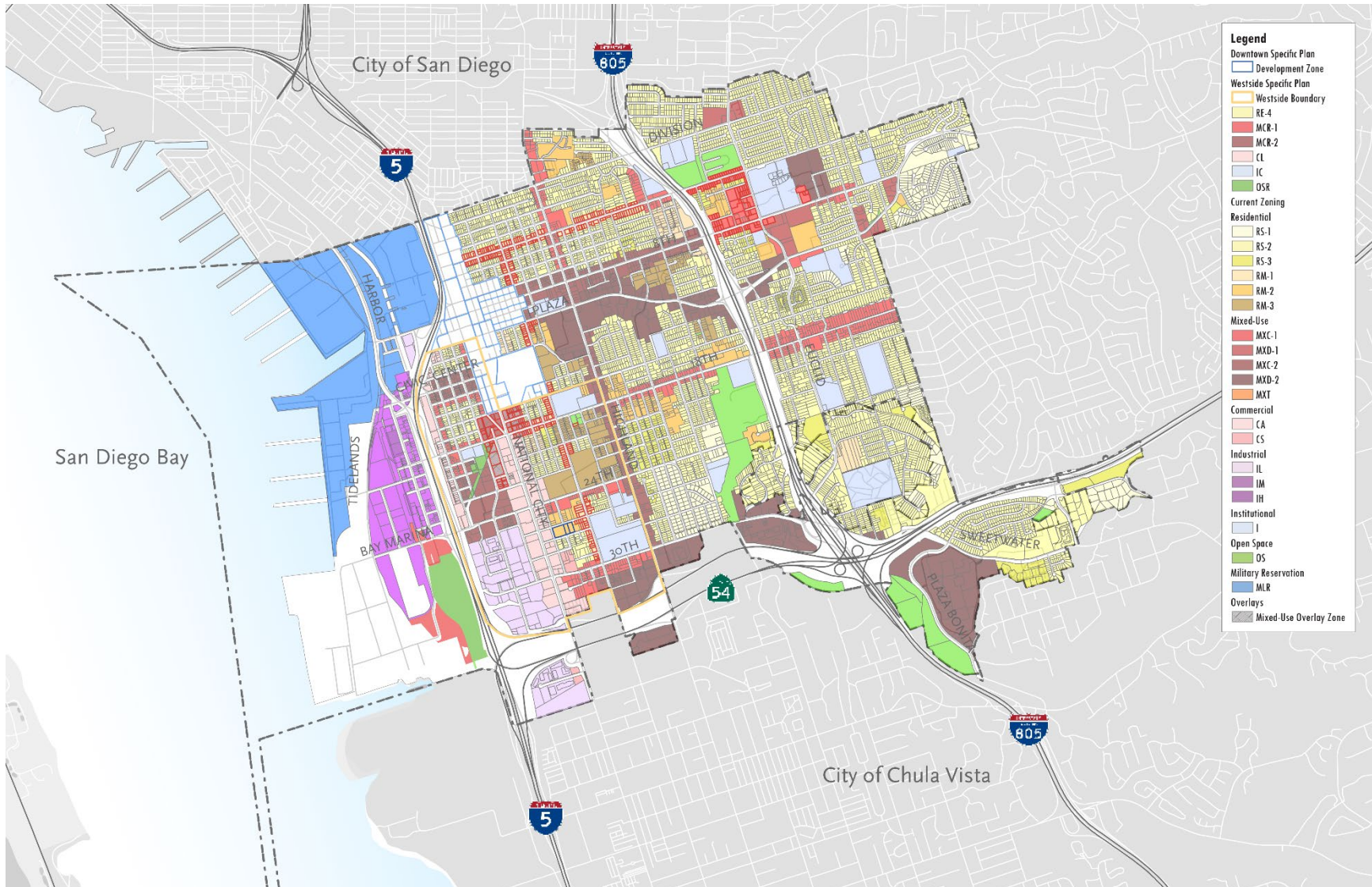
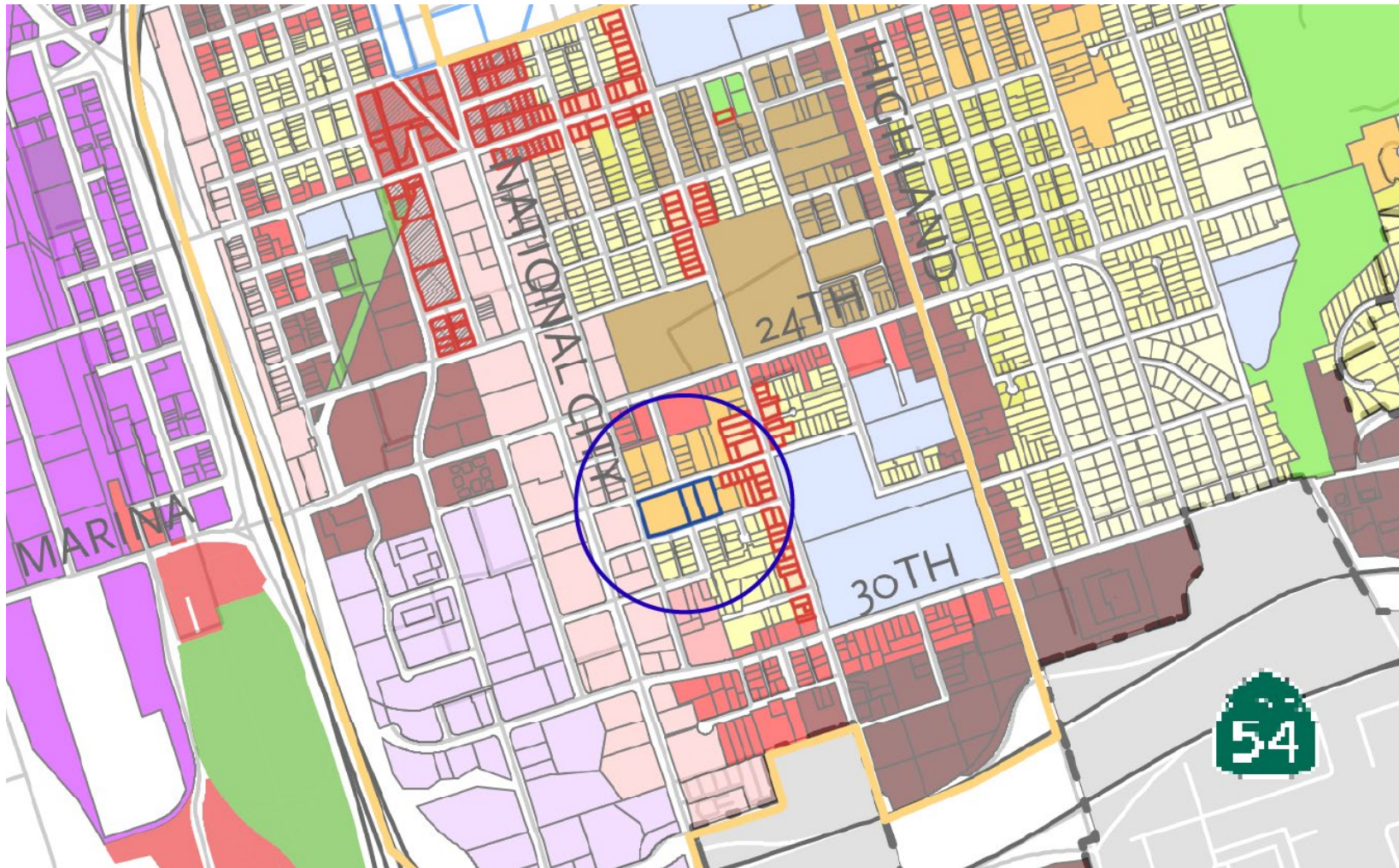




Figure 8.3-2 Alternate Project Location Alternative



## 8.4 ENVIRONMENTAL ANALYSIS

This section compares the significance conclusions of each major issue area assessed in this SPEIR for the Proposed Project and for the two alternatives. Table 8.4-1 shows a comparison of the significance conclusions associated with each alternative, with the differences indicated in bold.

**Table 8.4-1 Alternative Significance Comparison**

Resource	Project	Alternative	
	FGPU (Proposed Project)	No Project	Alternate Project Location Alternative
<b>Aesthetics</b>			
Visual Character and Visual Quality	Less than Significant	Same	Same
<b>Air Quality</b>			
Consistency with Air Quality Plans	Significant and Unavoidable	<b>Less</b>	Same
Air Quality Standards	Significant and Unavoidable	Same	Same
Sensitive Receptors	Significant and Unavoidable	<b>Less</b>	<b>Less</b>
Odors	Less than Significant	Same	Same
<b>Cultural Resources</b>			
Historic Resources	Significant and Mitigated	Same	Same
Archaeological Resources	Significant and Mitigated	Same	Same
Human Remains	Less than Significant	Same	Same
Tribal Cultural Resources	Less than Significant	Same	Same
<b>Paleontological Resources</b>	Significant and Mitigated	Same	Same
<b>Hazards and Hazardous Materials</b>			
Transport, use, and disposal	Less than Significant	Same	Same
Reasonably foreseeable upset and accident conditions	Less than Significant	Same	Same
Within ¼ mile of an existing or proposed school	Less than Significant	Same	Same
A site included on a list of hazardous materials sites	Significant	Same	Same



Resource	Project	Alternative	
	FGPU (Proposed Project)	No Project	Alternate Project Location Alternative
<b>Land Use</b>			
Conflict with land use plan, policy, regulations	Significant and Mitigated	<b>Greater</b>	<b>Less</b>
<b>Noise</b>			
Ambient Noise	Significant and Mitigated	Same	<b>Less</b>
Vibration	Significant and Mitigated	Same	Same
<b>Transportation</b>			
Conflict with program, plan, ordinance, policy	Less than significant	Same	Same
Inconsistency with Vehicle Miles Traveled	Less than significant	Same	Same
Geometric Design	Less than significant	Same	Same
Emergency Access	Less than significant	Same	Same
<b>Greenhouse Gas Emissions</b>			
GHG Emissions	Less than significant	<b>Greater</b>	Same
Conflict with Plan	Less than significant	<b>Greater</b>	Same

### 8.4.1 Environmental Analysis for the No Project (Adopted Plan) Alternative

#### 8.4.1.1 Aesthetics

##### Visual Character and Visual Quality

Impacts related to visual character and quality from buildout of the No Project Alternative would be similar to the those associated with the Proposed Project since future infill development in the Planning Area would not significantly impact visual character and visual quality. Future development under the No Project Alternative would be required to be reviewed on a site-specific basis for consistency with zoning and regulations guiding development. This would ensure visual character consistency within the Planning Area.

#### 8.4.1.2 Air Quality

##### Consistency with Air Quality Plans

Existing regional air plans are based on the existing City forecasts and therefore, the No Project Alternative, which is based on the Adopted General Plan, would be consistent with the Regional Air Quality Standards (RAQS). Therefore, the No Project Alternative would result in **less** impact than the Proposed Project, which would conflict with the RAQS, as the RAQS are based on the City’s 2011 Adopted General Plan projections.

**Air Quality Standards**

The No Project Alternative also has the potential to exceed San Diego Air Pollution Control District (SDAPCD) significance thresholds, as it cannot be known at this time if several projects would be constructed concurrently as buildout occurs under the Adopted General Plan. Therefore, the No Project Alternative would result in the same level of construction impacts as the Proposed Project at the program level.

**Sensitive Receptors**

The development of any new facilities (i.e., stationary sources) would be subject to the same rigor of health risk assessment and health risk reduction planning under both the Adopted General Plan and the Proposed Project. Future development under both the No Project Alternative and the Proposed Project may result in the exposure of sensitive receptors to substantial diesel particulate matter concentrations from mobile sources due to the potential for future infill development within 500 feet of I-5. However, under the No Project Alternative, fewer additional sensitive receptors would be placed in this location than under the Proposed Project. Therefore, the No Project Alternative would result in incrementally **less** impact than the Proposed Project at the program level.

**Odors**

The No Project Alternative would not introduce land uses known to generate substantial odors, and any construction-related odors from diesel-powered equipment would dissipate quickly, similar to the Proposed Project. Therefore, impacts would be similar.

**8.4.1.3 Cultural Resources****Historic Resources**

Impacts related to historic resources from buildout of the No Project Alternative would be similar to those of the Proposed Project since all future development and its associated construction activities have the potential to result in direct or indirect impacts to subsurface archaeological resources and to historical resources (structures) during grading and/or construction activities. Impacts would be potentially significant under all alternatives because no site-specific projects are being assessed at this time.

**Archaeological Resources**

Similar to the historic resources analysis above, while a majority of the Planning Area is largely built out with limited vacant and undeveloped land, construction activities from future development under the No Project Alternative, such as grading and excavation, has the potential to result in the accidental destruction or disturbance of previously unidentified archaeological sites on infill sites. Therefore, the No Project Alternative would have impacts to archaeological resources similar to those of the Proposed Project.

**Human Remains**

Impacts related to human remains from buildout of the No Project Alternative would be similar to those of the Proposed Project since the Planning Area is urbanized and a majority of infill sites have been previously developed. Therefore, the likelihood of discovery of human remains during construction is low.

**Tribal Cultural Resources**

As development under the No Project Alternative would primarily be infill on previously disturbed parcels, the likelihood of disturbing Tribal Cultural Resources is low. All future development activities would be required to comply with applicable federal and State statutes that are meant to protect Tribal Cultural Resources. Discretionary development projects would also be required to undergo environmental review pursuant to CEQA, which would include an assessment of impacts to the expanded definition of Tribal Cultural Resources and consultation with local tribes pursuant to

Assembly Bill 52. Therefore, the No Project Alternative would have impacts to Tribal Cultural Resources similar to those of the Proposed Project.

#### **8.4.1.4 Paleontological**

The No Project Alternative would have impacts to paleontological resources similar to those of the Proposed Project, due to the potential for inadvertent discovery of a paleontological resource to occur during construction.

#### **8.4.1.5 Hazards and Hazardous Materials**

##### **Transport, Use, and Disposal**

The No Project Alternative would result in an impact similar to that of the Proposed Project, as the routine use, transportation, and disposal of hazardous material and waste within and through National City would result from existing and future land use regardless of the intensity of development. Adoption of the No Project Alternative or Proposed Project would not result in a substantially greater volume of use or transport of hazardous materials than that presently occurring within the Planning Area.

##### **Reasonably Foreseeable Upset and Accident Conditions**

The No Project Alternative would have impacts similar to those of the Proposed Project in terms of reasonably foreseeable upset and accident conditions, as accidental release of hazardous materials—either known or unknown—could occur during excavation and construction of future infill development. Sites proposed for development with known contamination would be subject to further environmental review and conditions. Neither the Proposed Project nor the No Project Alternative would result in a substantially greater likelihood of foreseeable upset and accident conditions.

##### **Within ¼ Mile of an Existing or Proposed School**

The No Project Alternative would result in an impact similar to that of the Proposed Project, as neither would allow land uses that would emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste, such as industrial facilities handling chemical wastes, near existing schools. No new schools are proposed under the No Project Alternative or under the Proposed Project.

##### **Included on a List of Hazardous Materials Sites**

Since the No Project Alternative would also have the potential for infill development on a site included on a list of sites with known contamination, impacts would be similar to those of the Proposed Project. Redevelopment of contaminated sites, or adjacent sites, with existing soil or groundwater contamination could potentially pose a significant hazard to the public or the environment through releases of hazardous materials into the environment. Both the No Project Alternative and the Proposed Project would require mitigation to be completed prior to ground disturbance.

##### **Airports**

The programmatic impacts of the No Project Alternative as it relates to public airport-related safety and excessive noise impacts would be the same as those associated with the Proposed Project, as the Planning Area is not located within any Airport Influence Area (AIA) safety review zones or noise contours and does not involve any actual development and, thus, does not impact any airspace protection boundaries. However, future structures proposed under both alternatives would need to receive a Determination of No Hazard to Air Navigation from the Federal Aviation Administration (FAA). Future residential development within the Naval Air Station North Island (NASNI) AIA would also be required to submit an overflight notification per the NASNI Airport Land Use Compatibility Plan.

### 8.4.1.6 Land Use

#### Conflict with Land Use Plan, Policy, Regulations

The No Project Alternative would result in minor differences in consistency with existing plans and policies compared to the Proposed Project. The No Project Alternative would not directly propose residential development within 500 feet of the centerline of a freeway (e.g., the 24th Street Transit Center Focus Area of the Proposed Project) and therefore would be consistent with existing Policy HEJ-2.3:

*Avoid siting new sensitive land uses within 500 feet from the centerline of a freeway, unless such development contributes to smart growth, open space, or transit-oriented goals, in which case the development shall include feasible measures such as separation/setbacks, landscaping, barriers, ventilation systems, air filters/cleaners, and/or other effective measures to minimize potential impacts from air pollution.*

Although the intention of the 24th Street Transit Station Focus Area under the Proposed Project is to contribute smart growth and transit-oriented goals, the No Project Alternative would ultimately remove the proposal to site residential uses within this distance from the freeway.

The No Project Alternative would not update the General Plan elements and CAP to be in compliance with recent State and local legislation and plans to reduce GHG emissions and achieve sufficient new local housing supply.

Therefore, the No Project Alternative would ultimately result in a **greater** impact than that of the Proposed Project.

### 8.4.1.7 Noise

#### Ambient Noise

The No Project Alternative would also result in potentially substantial temporary increases in ambient noise levels at noise-sensitive receivers due to proximity to construction noise from subsequent development projects. Operationally, development under the No Project Alternative would be subject to the same common noise sources as the Proposed Project and would not generate vehicular traffic in volumes that would increase ambient noise levels substantially beyond those associated with the Proposed Project. However, the No Project Alternative would not propose residential development within 500 feet of the centerline of a freeway (e.g., the 24th Street Transit Station Focus Area) and, therefore, would have an incremental reduction in ambient noise impacts to sensitive receptors compared to the Proposed Project. Freeways are sources of sustained vehicular noise that contributes to the ambient noise environment. Therefore, impacts would be incrementally **less** than those associated with the Proposed Project.

#### Vibration

Future development under the No Project Alternative may require pile driving during construction and, therefore, has the potential for vibration impacts similar to those of the Proposed Project.

### 8.4.1.8 Transportation

#### Conflict with Program, Plan, Ordinance, Policy

The No Project Alternative would not necessarily conflict with local programs, plans, ordinances, or policies related to transportation but would not include the full suite of improvements of the Proposed Project that would help the City to further its transportation goals. Despite this, no conflicts would occur, and impacts would be the same under both the No Project Alternative and the Proposed Project.

#### Inconsistency with Vehicle Miles Traveled

VMT per capita for the No Project Alternative was modeled (see Appendix 13.C.1 for the Traffic Impact Assessment) and was determined to be slightly greater per capita than that of the Proposed Project (a delta of approximately 0.12 resident VMT per capita). Despite this, both are substantially lower than

the regional average of 14.72 resident VMT per capita, and therefore, impacts would be similar under both.

#### **Geometric Design**

The No Project Alternative would result in impacts similar to those associated with the Proposed Project since development would be required to conform with applicable State and City design criteria to minimize potential geometric design hazards on roadways.

#### **Emergency Access**

The No Project Alternative would result in impacts similar to those of the Proposed Project since development would be required to conform with applicable State and City design criteria to minimize potential impacts to emergency access.

### **8.4.1.9 Greenhouse Gas Emissions**

#### **GHG Emissions**

The No Project Alternative would result in **greater** impacts than the Proposed Project since it does not include greater connections to transit from higher-density development within a 0.5-mile radius of high-quality transit (and associated VMT reductions) and would not include updated CAP strategies that aim to reduce emissions from all sectors (energy, transportation, water, solid waste, etc.).

#### **Conflict with Plan**

The No Project Alternative would result in **greater** impacts than those of the Proposed Project since it does not include the GHG reduction strategies included in the 2022 California Air Resources Board (CARB) Scoping Plan. Therefore, it would not be consistent with the GHG reduction goals of the 2022 CARB Scoping Plan.

## **8.4.2 Environmental Analysis for the Alternate Project Location Alternative**

As the Alternate Project Location Alternative is identical to the Proposed Project in all ways, with the exception of the replacement of the 24th Street Transit Station with the Alternative Site, all impacts would be similar to those of the Proposed Project, with the exception of the issue analysis under Air Quality related to sensitive receptors, as detailed below.

### **8.4.2.1 Aesthetics**

#### **Visual Character and Visual Quality**

Impacts related to visual character and quality from buildout of the Alternate Project Location Alternative would be similar to those of the Proposed Project since the only difference between the two would be the 24th Street Transit Station Focus Area and the Alternative Site. The overall visual character and visual quality of the Planning Area would not be significantly impacted by this difference as future development under both alternatives would be on infill sites and would be subject to the same regulations and site plan review.

### **8.4.2.2 Air Quality**

#### **Consistency with Air Quality Plans**

The Alternate Project Location Alternative would be identical to the Proposed Project except for one Focus Area location; therefore, it would result impacts similar to those of the Proposed Project, relating to consistency with air quality plans. Since the RAQS are based on the City's 2011 Adopted General Plan projections, both the Alternative Project Location Alternative and the Proposed Project would conflict with the RAQS. Therefore, this is an inherent conflict until such time as the RAQS are updated.

#### **Air Quality Standards**

The Alternate Project Location Alternative has the potential to exceed SDAPCD significance thresholds, as it cannot be known at this time if several projects would be constructed concurrently as buildout



occurs. Therefore, the Alternate Project Location Alternative and the Proposed Project would result in similar impacts related to construction, at the program level.

### **Sensitive Receptors**

As detailed above, the Alternative Project Location Alternative would replace the proposed 24th Street Transit Station Focus Area mixed-use residential units out of the vicinity of the I-5 freeway and therefore would reduce air quality impacts to sensitive receptors as compared to the Proposed Project. Proximity to the busy I-5 corridor has the potential to expose sensitive receptors to emissions from stationary or mobile sources in the vicinity. As detailed in Chapter 4.2 Air Quality, Section 4.2.7.2 Mobile Sources, sensitive receptors within 500 feet of I-5 are likely to be subject to substantial diesel particulate matter concentrations from mobile sources. Therefore, as the Alternative Site is outside of the range of this distance, the Alternate Project Location Alternative would result in **less** impact than the Proposed Project.

### **Odors**

The Alternative Project Location Alternative would not introduce land uses known to generate substantial odors, and any construction-related odors from diesel-powered equipment would dissipate quickly, similar to the Proposed Project. Therefore, impacts would be similar.

## **8.4.2.3 Cultural Resources**

### **Historic Resources**

Impacts related to historic resources from buildout of the Alternative Project Location Alternative would be similar to those of the Proposed Project as future site-specific infill development would be unknown. The potential for impacts to historic resources would be similar under both this alternative and the Proposed Project.

### **Archaeological Resources**

Similar to the historic resources analysis above, while a majority of the Planning Area is largely built out with limited vacant and undeveloped land, construction activities from future development under the Alternative Project Location Alternative, such as grading and excavation, have the potential to result in the accidental destruction or disturbance of previously unidentified archaeological sites on infill sites. Therefore, the Alternative Project Location Alternative and Proposed Project would have similar impacts to archaeological resources.

### **Human Remains**

Impacts related to human remains from buildout of the Alternative Project Location Alternative would be similar to those of the Proposed Project as the entire Planning Area is urbanized and largely developed, and so the likelihood of discovery of human remains is low.

### **Tribal Cultural Resources**

Impacts related to Tribal Cultural Resources from buildout of the Alternative Project Location Alternative would be similar to those of the Proposed Project as all future development activities would be required to comply with applicable federal and State statutes, as detailed above, that are meant to protect Tribal Cultural Resources.

## **8.4.2.4 Paleontological**

Impacts of the Alternative Project Location Alternative and Proposed Project would be similar because no site-specific projects are being assessed at this time, and therefore, the potential for impacts would be possible and significant due to the potential for inadvertent discovery of a paleontological resource during construction. Both would implement the required mitigation framework to reduce impact significance in the event of inadvertent discovery.

### **8.4.2.5 Hazards and Hazardous Materials**

#### **Transport, Use, and Disposal**

The Alternative Project Location Alternative would result in an impact similar to that of the Proposed Project as the routine use, transportation, and disposal of hazardous material and waste within and through National City would result from existing and future land use regardless of the intensity of development. Adoption of the Alternative Project Location Alternative or Proposed Project would not result in a substantially greater volume of use or transport of hazardous materials than that presently occurring within the Planning Area.

#### **Reasonably Foreseeable Upset and Accident Conditions**

The Alternative Project Location Alternative would have impacts similar to those under the Proposed Project as accidental release of hazardous materials—either known or unknown—could occur during excavation and construction of future infill development. Sites proposed for development with known contamination would be subject to further environmental review and conditions. Neither the Proposed Project nor the Alternative Project Location Alternative would result in a substantially greater likelihood of foreseeable upset and accident conditions with its implementation.

#### **Within ¼ Mile of an Existing or Proposed School**

The Alternative Project Location Alternative would result in an impact similar to that of the Proposed Project as neither would allow land uses that would emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste, such as industrial facilities handling chemical wastes, near existing schools. No new schools are proposed under the Alternative Project Location Alternative or under the Proposed Project.

#### **A Site Included on a List of Hazardous Materials Sites**

Since the Alternative Project Location Alternative would have the potential for infill development on a site included on a list of sites with known contamination, impacts would be similar to those of the Proposed Project. Redevelopment of contaminated sites, or adjacent sites, with existing soil or groundwater contamination could potentially pose a significant hazard to the public or the environment through releases of hazardous materials into the environment. Both the Alternative Project Location Alternative and Proposed Project would require mitigation to be completed prior to ground disturbance.

#### **Airport**

The Alternate Project Location Alternative would have impacts similar to those of the Proposed Project as it relates to safety and excessive noise from a public airport since the Planning Area is not within safety review areas or noise contours. Future development under the Alternate Project Location Alternative would be subject to NASNI notification requirements as applicable and be required to receive a Determination of No Hazard to Air Navigation from the FAA.

### **8.4.2.6 Land Use**

#### **Conflict with Land Use Plan, Policy, Regulations**

The Alternative Project Location Alternative would result in incrementally **less** impact relating to consistency with local policies since it would not propose residential development within 500 feet of the centerline of a freeway (e.g., the 24th Street Transit Center Focus Area of the Proposed Project), and therefore consistent with Adopted General Plan Policy HEJ-2.3:

*Avoid siting new sensitive land uses within 500 feet from the centerline of a freeway, unless such development contributes to smart growth, open space, or transit-oriented goals, in which case the development shall include feasible measures such as separation/setbacks, landscaping, barriers, ventilation systems, air filters/cleaners, and/or other effective measures to minimize potential impacts from air pollution.*

Although the intention of the 24th Street Transit Station Focus Area under the Proposed Project is to contribute smart growth and transit-oriented goals, the Alternative Project Location Alternative would ultimately remove the proposal to site residential uses within this distance from the freeway.

### **8.4.2.7 Noise**

#### **Ambient Noise**

The Alternative Project Location Alternative would also result in potential temporary increases in ambient noise levels at noise-sensitive receivers due to proximity to construction noise from subsequent development projects. Operationally, development under the Alternative Project Location Alternative would be subject to the same common noise sources as the Proposed Project and would not generate vehicular traffic in volumes that would increase ambient noise levels substantially beyond those of the Proposed Project. However, the Alternative Project Location Alternative would remove the proposal for development within 500 feet of the centerline of a freeway (e.g., the 24th Street Transit Station Focus Area) and, therefore, would have an incremental reduction in ambient noise impacts to sensitive receptors compared to the Proposed Project. Freeways are sources of sustained vehicular noise that contributes to the ambient noise environment. Therefore, impacts would be incrementally **less** than those of the Proposed Project.

#### **Vibration**

Future development under the Alternative Project Location Alternative may require pile driving during construction and therefore has the potential for vibration impacts similar to those of the Proposed Project.

### **8.4.2.8 Transportation**

#### **Conflict with Program, Plan, Ordinance, Policy**

The Alternative Project Location Alternative would result in impacts to similar those of the Proposed Project as the difference in one Focus Area would not change the significance of impacts as noted in the analysis for the Proposed Project in Chapter 4.8 Transportation and Circulation.

#### **Inconsistency with VMT**

VMT per capita was not modelled for the Alternative Project Location Alternative, but can be reasonably assumed to not differ substantially from the Proposed Project as only one Focus Area, with similar development potentials, was changed between the two alternatives. Therefore, impacts of both alternatives would be similar.

#### **Geometric Design**

The Alternative Project Location Alternative would result in impacts similar to those of the Proposed Project since development would be required to conform with applicable State and City design criteria to minimize potential geometric design hazards on roadways.

#### **Emergency Access**

The Alternative Project Location Alternative would result in impacts similar to those of the Proposed Project since development would be required to conform with applicable State and City design criteria to minimize potential impacts to emergency access.

### **8.4.2.9 Greenhouse Gas Emissions**

#### **GHG Emissions**

VMT per capita was not modelled for the Alternative Project Location Alternative, and therefore GHG emissions were not modelled as they rely on VMT data but can be reasonably assumed to not differ substantially from the Proposed Project as only one Focus Area, with similar development potential, was changed between the two alternatives. Therefore, impacts of this alternative would be similar to those of the Proposed Project.

**Conflict with Plan**

The difference in one Focus Area between the Alternative Project Location Alternative and the Proposed Project would not cause the alternative to conflict with the 2022 CARB Scoping Plan. The Alternative Project Location Alternative would also include GHG reduction strategies, similar to the Proposed Project. Therefore, impacts of this alternative would be similar to those of the Proposed Project.

**8.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE**

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

In the case of this SPEIR, the Alternate Project Location is considered the Environmentally Superior Alternative because, due to the exclusion of the 24th Street Transit Center Focus Area, it would incrementally reduce significant impacts associated with air quality emissions on sensitive receptors compared to the Proposed Project. This alternative would comply with the CARB Scoping Plan and Sustainable Communities Strategy since it would assist in regional efforts to reduce VMT by providing opportunities for higher-density residential land uses in proximity to transit. The Alternative Project Location Alternative would meet all the project's objectives (although not to the same degree as the Proposed Project due to the removal of the 24th Street Transit Station Focus Area which would reduce the Planning Area's transit oriented developments). In conclusion, the Alternate Project Location Alternative is considered the Environmentally Superior Alternative because it would result in fewer impacts than the Proposed Project and would still meet the project's objectives.