CHAPTER 8
ALTERNATIVES

8.1 Scope and Purpose

Section 15126.6(a) of the California Environmental Quality Act (CEQA) Guidelines requires that an environmental impact report (EIR) "describe a range of reasonable alternatives to the proposed project, or to the location of the project, that would feasibly attain most of the basic objectives but would avoid or substantially lessen any of the significant environmental effects of the project, and evaluate the comparative merits of the alternatives." Section 15126.6(a) also provides that an EIR need not consider every conceivable alternative to a project. Instead, the EIR must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation.

Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (California Public Resources Code, Section 21002.1), the purpose of an EIR's alternatives discussion is to focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project, even if the alternatives would impede to some degree the attainment of the project's objectives or be more costly.

However, an EIR need not consider alternatives that are infeasible. There also is no ironclad rule governing the nature or scope of the alternatives to be discussed in an EIR, other than the "rule of reason." The "rule of reason" governing the range of alternatives specifies that an EIR should only discuss those alternatives necessary to foster meaningful public participation and informed decision making.

The CEQA Guidelines require the EIR to analyze a "No Project" Alternative. CEQA also requires that an EIR identify the environmentally superior alternative from among the evaluated alternatives. If the environmentally superior alternative is the No Project Alternative, then the EIR shall identify an environmentally superior alternative among the other alternatives (14 CCR 15126.6(e)(2)).

The Alta Oceanside Project (proposed project) would result in two significant and unavoidable transportation impacts. The proposed project would result in potentially significant impacts that would be reduced to a level below significant related to the following: biological resources, cultural resources, geology and soils, noise, tribal cultural resources, and air quality. The proposed project would result in no impact or less-than-significant impacts to the following: aesthetics, agriculture and forestry resources, energy, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, population and housing, public services, recreation, utilities and service systems, and wildfire.

For each of the alternatives identified, this EIR conducts the following assessment:

- Describe the alternative
- Determine if the alternative would meet most of the basic project objectives
- Assess potential feasibility of the alternative
- Determine if the alternative would potentially eliminate or reduce a potentially significant impact of the project

If the alternative meets the above criteria and provides a meaningful CEQA analysis, then the EIR analysis will address the potential impacts of the alternative relative to those potentially significant impacts of the project. An environmentally superior alternative will then be identified based on the alternative's ability to reduce environmental impacts.

Based on the identified potentially significant environmental impacts above, the objectives established for the project (refer to Section 8.2.1, Project Objectives, below), consideration of local plans and zoning designations, and consideration of public input, this EIR evaluates three alternatives to the proposed project:

1. No Project (No Build) Alternative
2. No Project (Development Per Entitlements)
3. Reduced Footprint Alternative

8.2 Criteria for Selection and Analysis of Alternatives

8.2.1 Project Objectives

1. Provide a mixed-use development that contributes to the revitalization of Downtown Oceanside pursuant to the City of Oceanside (City) General Plan Special Management Area Redevelopment Project Area, and the Coast Highway Vision and Strategic Plan Redevelopment Area.
2. Provide frontage improvements consistent with the current draft Coast Highway Corridor Study and General Plan Circulation Element.
3. Develop a project with market rate housing that at least meets the General Plan authorized density of 43 dwelling units/acre to help satisfy the City's current and future demand for housing, as outlined in the General Plan Housing Element and the City's Regional Housing Needs Assessment allocation.

4. Implement State density bonus law and the City's General Plan Housing Element by providing housing for a mix of income levels, including at least 10% of the project's base dwelling units for very low income households on the project site.
5. Increase the intensity of development sufficiently to feasibly provide amenities and services that add value and contribute to a higher quality of life for residents, such as wellness/fitness areas, common recreational spaces, access to co-work space, and proximity to multi-modal transportation options (transit, pedestrian, and bicycle connections) and coastal recreation areas.
6. Conserve natural resources and promote efficient use of land by developing a previously disturbed, in-fill property with a mixed-use development that incorporates energy efficient and sustainability features into the project's design in an area currently served by existing utility infrastructure.
7. Provide pedestrian oriented building design and site layout elements along North Coast Highway by screening parking areas from public view, providing pedestrian features such as plazas and providing visual relief features to break up building massing.
8. Provide commercial space suitable for both visitor-serving and resident-serving commercial uses near residential and recreational areas.
9. Provide commercial uses and other project features that front on North Coast Highway to activate the streetscape and pedestrian corridor in accordance with the Coast Highway Vision and Strategic Plan.

8.2.2 Feasibility

CEQA Guidelines, Section 15126.6(f)(1), identifies the factors to be taken into account to determine the feasibility of alternatives. The factors include site suitability; economic viability; availability of infrastructure; general plan consistency; other plans or regulatory limitations; jurisdictional boundaries; and whether the applicant can reasonably acquire, control, or otherwise have access to the alternative site. No one of these factors establishes a fixed limit on the scope of reasonable alternatives. An alternative does not need to be considered if its environmental effects cannot be reasonably ascertained and if implementation of such an alternative is remote or speculative.

It has been recognized that, for purposes of CEQA, "feasibility" encompasses "desirability" to the extent that the latter is based on a reasonable balancing of the relevant economic, environmental, social, and technological factors (*California Native Plant Society v. City of Santa Cruz* [2009] 177 Cal.App.4th 957, 1001). This balancing is harmonized with CEQA's fundamental recognition that policy considerations may render alternatives impractical or undesirable (California Public Resources Code Section 21081; CEQA Guidelines Section 15126.6[c] and 15364).

8.2.3 Evaluation of Significant Impacts

According to CEQA Guidelines, Section 15126.6(b), the alternatives discussion should focus on those alternatives that, if implemented, could eliminate or reduce any of the significant environmental impacts of the proposed project. The significant effects of the project impacts are considered to be those that are identified to be potentially significant prior to the incorporation or implementation of any mitigation measures.

8.2.4 Rationale for the Selection of Alternatives

As part of an alternatives analysis, CEQA requires an EIR to address a No Project Alternative. The purpose of describing and analyzing a No Project Alternative is to allow decision makers to compare the impacts of approving a proposed project with the impacts of not approving the proposed project.

EIRs should also identify any alternatives that were considered by the Lead Agency but rejected, and briefly explain the reasons why the Lead Agency made such a determination. Among the factors that may be used in an EIR to eliminate alternatives from detailed consideration are (i) failure to meet most of the basic project objectives, (ii) infeasibility, and/or (iii) inability to avoid significant environmental impacts.

In accordance with these requirements and based on comments received during the CEQA Notice of Preparation and scoping process for the proposed project, alternatives to the proposed project were considered and analyzed compared to the proposed project. A No Project (No Build) Alternative is considered as the "no project" alternative. As there are existing entitlements on the project site, the No Project (Build per Entitlements) is also included. These two No Project alternatives and the Reduced Footprint Alternative are addressed in Section 8.4, Alternatives Under Consideration, below. Based on the Coast Highway Vision Plan (City of Oceanside 2009) and uses allowed in Downtown District (DT) within Subdistrict 7B, a mixed-use hotel and residential Land Use Alternative was considered but rejected due to the inability to meet the basic project objectives. Considering the significant project impacts are related to the existing project site conditions, a Location Alternative was also considered but rejected due to infeasibility. In addition, a Traffic Impact Avoidance Alternative was considered to avoid all the significant not mitigated transportation impacts of the project; however, it would also not meet the basic project objectives. These three alternatives are discussed in Section 8.3, Alternatives Considered but Rejected.

8.3 Alternatives Considered But Rejected

This EIR considered two additional alternatives that are not carried forward for detailed analysis. These alternatives are described below.

8.3.1 Location Alternative

In accordance with CEQA Guidelines 15126.6(f)(2), an EIR may consider an alternative location for the proposed project, but is only required to do so if significant project effects would be avoided or substantially lessened by moving the project to another site. As the project impacts are all site specific, this Location Alternative was considered as a potential alternative. The intent would be to locate an alternative site within the downtown area of the City that would avoid or substantially lessen one or more of the following impacts: biological, cultural, geology and soils, transportation, tribal cultural resources, air quality, and/or construction noise impacts. This Alternative is assumed to include the same components as the project, and would require a site similar to the project's five-acre site in the downtown Oceanside area.

There may be sites within the City of an approximately equivalent size to the project site that could be redeveloped with a mixed-use residential project; however, the project applicant does not control another site within the City of comparable land area that is available for development of the project. One of the factors for feasibility of an alternative is "whether the proponent can reasonably acquire, control or otherwise have access to the alternative site." As described in Section 2.1.1, the development of the project site as assembled currently has been contemplated since 1999, but an agreement to assemble the parcels of the project site was only recently reached. It is unlikely and speculative to assume the feasibility of assembling another site similar to the proposed project that meets most of the project objectives and avoids or substantially lessens the project's potential significant impacts (Creager, pers. comm. 2019). The Location Alternative was considered but rejected due to feasibility. As an independent basis, the Location Alternative was considered but rejected due to the project's proposed mixed-use development being consistent with the General Plan and other applicable land use plans and regulations. As a result of that consistency with the adopted land use policy documents, and this EIR's inclusion of a reasonable range of alternatives, CEQA does not require consideration of an off-site alternative that may not even be feasible to identify let alone acquired.

8.3.2 Traffic Impact Avoidance Alternative

As the project has significant and unmitigated traffic impacts, an alternative that would avoid all significant traffic impacts was considered. To avoid all traffic impacts and not increase the volume to capacity ratio along North Coast Highway by 0.02 in the buildout condition (year 2035), the development would need to be reduced to generate 245 or less average daily trips (Appendix H). Considering the San Diego Association of Governments (Not So) Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region (SANDAG 2002) of 8 trips per condominium unit, 160 trips per 1,000 square feet of high turnover restaurant and 10% reduction for mixed use projects consistent with SANDAG's regional smart growth policies, a Traffic Impact Avoidance Alternative would consist of 11 multi-family units and 1,152 square

feet of high turnover restaurant. This alternative was considered but rejected due to the inability to meet the majority of project objectives and because such a redevelopment would not be reasonable to assume to occur.

The Traffic Impact Avoidance Alternative would meet four of the project's nine objectives. This would meet Objective 2, 7, 8 and 9, as it would include a crosswalk along North Coast Highway, could include building design oriented towards North Coast Highway, and would provide commercial uses. This alternative would not meet the goals to revitalize the site in accordance with plans (Objective 1), the planned density for the site (Objective 4), would not include a density bonus or affordable housing (Objective 4), would not include high quality recreational amenities that contributes to a higher quality of life (Objective 5), and would not provide an efficient use of land (Objective 6). Thus, this alternative would not meet the majority of project objectives and is rejected.

In addition, it is not reasonable to expect that the site would be developed with less units than the site is currently entitled for. As discussed under the No Project (Development per Entitlements), a portion of the site is currently entitled to be developed with 52 residential condominium units and 1,152 square feet of retail space. Thus the inclusion of this alternative for full analysis would not add to the meaningful discussion of project alternatives.

8.4 Alternatives Under Consideration

8.4.1 No Project (No Build) Alternative

8.4.1.1 Alternative Description

Under the No Project (No Build) Alternative, the project site would remain in its existing condition and would not involve the construction of any new development or associated improvements. The existing commercial developments, vacant buildings, and other site conditions would remain in their current state. Refer to Chapter 2.1.3, Existing Land Uses, for a description of the existing uses on site.

8.4.1.2 Comparison of Significant Effects

Biological Resources

No significant impacts to sensitive biological resources would occur under this alternative; existing non-native grasslands and nesting birds, would not be impacted. Therefore, this alternative would avoid biological resource impacts of the proposed project.

Cultural Resources

This alternative would not require any excavation or grading; therefore, this alternative would not encounter known and unknown potentially significant archaeological resources. Therefore, this alternative would avoid cultural resource impacts of the proposed project.

Geology and Soils

No grading would occur under this alternative; therefore, there would be no potential impact to paleontological resources. Therefore, this alternative would avoid geology and soils (paleontological resource) impacts of the proposed project.

Noise

This alternative would not require use of noise-generating construction equipment, and no construction noise impact would occur. Therefore, this alternative would avoid noise impacts of the proposed project.

Transportation

As this alternative would retain all existing uses and would not add any additional uses, the traffic generated by this alternative would not change. Thus, this alternative would avoid the significant and unmitigated transportation impacts of the project.

Tribal Cultural Resources

No construction or development would occur on site under this alternative. Therefore, this alternative does not have the potential to affect Tribal Cultural Resources (TCRs). Therefore, this alternative would avoid TCR impacts of the proposed project.

Air Quality

As no construction would occur under this alternative, the No Project (No Build) Alternative would avoid the significant air quality impact related to the exposure of sensitive receptors to toxic air contaminants (TACs) generated by project construction. As this alternative would not propose any new site uses, the No Project (No Build) Alternative would also avoid the project's impact related to the exposure of future residents to TACs generated by the adjacent freeways.

8.4.1.3 Relation to Project Objectives

This alternative would not meet any of the project objectives.

8.4.2 No Project (Development per Entitlements)

8.4.2.1 Alternative Description

The No Project (Development per Entitlements) Alternative would include the development of the entitled Seacliff Terraces project on the property and no new development on the remainder of the site. The 1.7-acre residential and retail development would be located on APNs 143-040-23 and -54 in the northwestern area of the site. The development to be constructed would include 1,152 square feet of retail space, 52 residential condominium units, a public recreational viewing deck, a public retail patio, and supporting amenities. This development would be included within one four-story building with two levels of underground parking. The remaining 3.4 acres of the site would remain in its current condition as vacant, previously disturbed land. (See Chapter 2). This would include the continued operation of the existing commercial uses. In addition, this No Project (Development per Entitlements) alternative assumes that the currently vacant buildings could be occupied.

8.4.2.2 Comparison of Significant Effects

Biological Resources

The No Project (Development per Entitlements) Alternative would be located within the same site as the proposed project, but less development would occur. Considering the location of the proposed development, the No Project (Development per Entitlements) Alternative would continue to result in potentially significant impacts to nesting birds (direct and indirect), raptor foraging and non-native grasslands. While this alternative would result in impacts to these biological resources, impacts would be substantially lessened considering the reduced disturbances to non-native grassland and potential nesting bird areas. Therefore, this alternative would result in reduced biological resource impacts compared to the proposed project.

Cultural Resources

The No Project (Development per Entitlements) Alternative would be located within the same site as the proposed project, but less new development would occur. Since the development area that would be graded would be reduced to 1.7 acres, the potential to impact unknown subsurface resources would accordingly be reduced relative to the 5.3-acre project. This alternative would also avoid the area where the cultural resource isolate was located on site. Therefore, this alternative would substantially lessen the cultural resource impacts compared to the proposed project.

Geology and Soils

This alternative would be located on the same site as the proposed project, with the same underlying geology. Due to the inclusion of underground parking, this alternative would result in

increased grading cuts into formations with high paleontological sensitivity. Therefore, No Project (Development per Entitlements) Alternative would result in greater geology and soils impacts than the proposed project.

Noise

Overall, construction activities would be reduced and shortened under this alternative compared to the proposed project. Construction activities under this alternative would be located a similar distance to Seacliff condominiums, but less impacts to the adjacent MiraMar mobile home community. Considering fewer sensitive receptors would be potentially impacted by construction noise, the No Project (Development per Entitlements) Alternative would substantially lessen construction noise impacts compared to the proposed project.

Transportation

The project would result in significant and not mitigated impacts to two segments of North Coast Highway; between Harbor Drive and Costa Pacifica Way as well as Costa Pacifica Way to SR-76 (Section 4.5, Transportation). As the project's only potentially significant traffic impacts are at these segments, this analysis is focused on the ability of this alternative to avoid or reduce impacts to these two segments of North Coast Highway.

The addition of 52 residential units and 1,152 square feet of commercial to the site would result in a trip generation of approximately 446 ADT[1] based on the San Diego Association of Governments (Not So) Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region (SANDAG 2002) and a 10% reduction per SANDAG's regional "smart growth" policies regarding mixed-use developments.

Per Table 8-1, the addition of the No Project (Development per Entitlements) traffic to the baseline existing and existing plus cumulative conditions would not result in unacceptable operations on North Coast Highway. Thus, this alternative would avoid the project's direct impact to North Coast Highway, Costa Pacifica Way to SR-76.

Under the buildout year (2035) conditions at the North Coast Highway roadway segments impacted by the project, the volume to capacity increase that would occur under the No Project (Development per Entitlements) would be 0.01 V/C at the Harbor Drive to Costa Pacifica Way segment, and an increase of 0.02 V/C at the Costa Pacifica Way to SR-76 segment. Thus, this

[1] It is noted that the previous Traffic Impact Analysis (LLG 2014) prepared for this Seacliff Terrace project identified 458 net trips. In an effort to maintain consistency in the analysis, this analysis herein assumes the same trip generation rates as used for the project, including the mixed use reduction. Similarly, the analysis included herein utilizes the updated baseline information based on current traffic conditions and the currently anticipated cumulative projects.

alternative would avoid the project's cumulative impact to North Coast Highway, Harbor Drive to Costa Pacifica Way. While this alternative would continue to result in a significant not mitigated cumulative impact to the North Coast Highway, Costa Pacifica Way to SR-76 segment, this impact would be lessened relative to the project.

Tribal Cultural Resources

The No Project (Development per Entitlements) Alternative would be located within the same site as the proposed project, but less development would occur. Since the development area would be reduced to 1.7 acres, the potential to impact to unknown subsurface tribal cultural resources would accordingly be reduced relative to the 5.1-acre project. This alternative would also avoid the area where a potentially significant tribal cultural resource isolate was located on site. Therefore, this alternative would substantially lessen tribal cultural resource impacts compared to the proposed project.

Table 8-1
No Project (Development per Entitlements) Alternative
Roadway Segment Level of Service

Roadway Segment	Classification	LOS "E" ADT	Baseline			Alt Traffic	Baseline plus Project			Change in V/C	Impact?
			ADT[1]	*V/C*[2]	*LOS*[3]		*ADT*[1]	*V/C*[2]	*LOS*[3]		
Existing Conditions											
North Coast Hwy, Costa Pacifica Way to SR-76	Collector Road (with TWLTL)	15,000	11,300	0.75	D	402	11,702	0.78	D	0.03	No
Existing Plus Cumulative											
North Coast Hwy, Costa Pacifica Way to SR-76	Collector Road (with TWLTL)	15,000	11,800	0.79	D	402	12,202	0.81	D	0.03	No
Buildout Year (2035)											
North Coast Hwy, Harbor Dr to Costa Pacifica Way	Collector Road (with TWLTL)	15,000	17,300	1.15	**F**	45	17,345	1.16	**F**	0.01	No
North Coast Hwy, Costa Pacifica Way to SR-76	Collector Road (with TWLTL)	15,000	15,400	1.03	**F**	402	15,802	**1.05**	**F**	**0.02**	**Yes**

Source: Appendix H
Note: Capacity and LOS based is on City of Oceanside Roadway Segment LOS Thresholds
1 ADT – Average Daily Traffic
2 V/C – Volumes to Capacity Ratio
3 LOS – Level of Service

Air Quality

The No Project (Development per Entitlements) Alternative would include construction that would generate TACs in proximity to sensitive receivers (i.e., adjacent residential uses); however, the TACs generated would be less than the project considering the construction area would be reduced to 1.7 acres and the construction time period would be reduced.

The California Air Resources Board (CARB) encourages consideration of the health impacts of freeways and high-traffic roadways on sensitive receptors sited within 500 feet (CARB 2005). This alternative would include the provision of residential uses on the site that would be considered a sensitive receptor; however, the residences would be located over 500 feet from the nearest freeway and this alternative would be assumed to have a less than significant health risk per the CARB criteria. As such, this alternative would avoid the project's impact related to the exposure of future residents to TACs generated by the adjacent freeways.

8.4.2.3 Relation to Project Objectives

The No Project (Development per Entitlements) Alternative would meet project Objectives 1 and 5. This alternative would not meet Objectives 2, 3, 4, 6, 7, 8 or 9. The project would meet Objective 1 since it would partially redevelop the site, however, it would meet this objective to a lesser degree than the project. The project would not meet Objective 2, as it would not provide improvements to North Coast Highway. Objectives 3 and 4 would be not met since this alternative would not provide additional housing at the General Plan density not would it include affordable housing. This alternative would include amenities pursuant to Objective 5, through to a lesser extent than the project. This alternative would not meet Objective 6, as it would not include an efficient use of the land. This alternative would not meet Objective 7, as it would not provide pedestrian orientated features along North Coast Highway. This alternative would not meet Objectives 8 or 9, as the proposed commercial would be unlikely to be visitor-serving due to its location and the commercial would not be provided on North Coast Highway. As such, this alternative would not meet the basic project objectives.

8.4.3 Reduced Footprint Alternative

8.4.3.1 Alternative Description

The Reduced Footprint Alternative has been designed to avoid all impacts to on-site non-native grasslands. As such, this alternative would compress the development into only the eastern portion of the site along North Coast Highway and preserve the western portion of the site (Figure 8-1, Reduced Footprint Alternative). Due to this higher density design and fewer units recreational amenities would be reduced, and the proposed building would be five stories above podium. The proposed site access would be directly to North Coast Highway, as a strip of non-native grassland

extends along the northern property line, thereby eliminating vehicular access from Costa Pacifica Way. The North Coast Highway access point would be located across from the City of Oceanside Chamber of Commerce northern driveway, and would be limited to right-turn in/out access. Due to the reduced area of disturbance, at least 1.5 levels of below grade parking would be required. Additionally due to the reduced development footprint, the total number of units would be below the allowed density for this zone, and this alternative would not require a density bonus nor include affordable housing. Overall, this Reduced Footprint Alternative would include 117 residential units and 2,700 square-feet of commercial. The non-native grassland on site would be preserved as open space via a conservation easement.

8.4.3.2 Comparison of Significant Effects

Biological Resources

The Reduced Footprint Alternative would be located within the same site as the proposed project, but less development would occur. Considering the location of existing trees, the Reduced Footprint Alternative would continue to result in significant impacts to nesting birds (direct and indirect). However, this alternative would avoid the project's significant impact to raptor foraging and non-native grasslands. Therefore, this alternative would substantially lessen biological resource impacts compared to the proposed project.

Cultural Resources

The Reduced Footprint Alternative would be located within the same site as the proposed project, but less development would occur. Since the development area would be reduced and development would be located in the more disturbed area of the site where topsoil has already been disturbed by previous grading, the potential to impact to unknown subsurface resources would accordingly be reduced relative to the 5.3-acre project. This alternative would also avoid the area where the cultural resource isolate was located on site as well. Therefore, this alternative would substantially lessen cultural resource impacts compared to the proposed project.

Geology and Soils

This alternative would be located on the same site as the proposed project, with the same underlying geology. This alternative would result in deeper grading cuts into formations with high paleontological sensitivity and would likely encounter existing groundwater (at depth of 20 feet or greater). Therefore, Reduced Footprint Alternative would result in greater impacts relative to the proposed project.

Noise

The intensity of noise during grading within the construction area may be increased relative to the project due to the additional excavation required for the below ground parking and the associated need for shoring. However, construction activities under this alternative would be located a minimum of approximately 175 feet from the nearest residential receivers (Seacliff condominiums and the MiraMar mobile home community). Doubling the distance from the receiver drops the intensity by about 6 dB, and a distance times 10 reduces the noise intensity by 20 dB. Considering this, the Reduced Footprint Alternative would substantially lessen potential construction noise impacts compared to the proposed project.

Tribal Cultural Resources

The Reduced Footprint Alternative would be located within the same site as the proposed project, but less development would occur. Since the development area would be reduced and development would be located in the more disturbed area of the site where topsoil has already been disturbed by previous grading, the potential to impact to unknown subsurface tribal cultural resources would accordingly be reduced relative to the project. This alternative would also avoid the area where a tribal cultural resource isolate was located on site. Therefore, this alternative would substantially lessen tribal cultural resource impacts compared to the proposed project.

Transportation

The project would result in significant and not mitigated impacts to two segments of North Coast Highway; between Harbor Drive and Costa Pacifica Way as well as Costa Pacifica Way to SR-76 (Section 4.5, Transportation). As the project’s only potentially significant traffic impacts are at these segments, this analysis is focused on the ability of this alternative to avoid or reduce impacts to these two segments of North Coast Highway.

The addition of 117 residential units and 2,700 square feet of commercial to the site would result in a trip generation of approximately 1,021 ADT based on the San Diego Association of Governments (Not So) Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region (SANDAG 2002) and a 10% reduction per SANDAG's regional "smart growth" policies regarding mixed-use developments.

Per Table 8-2, the addition of Reduced Footprint Alternative traffic to the baseline existing and existing plus cumulative conditions would not result in unacceptable operations on North Coast Highway. Thus, this alternative would avoid the project's direct impact to North Coast Highway, Costa Pacifica Way to SR-76.

Per Table 8-2, based on the addition of this traffic to the buildout year (2035) conditions at the North Coast Highway roadway segments impacted by the project, the volume to capacity increase that would occur under the Reduced Footprint Alternative would be 0.01 V/C at the Harbor Drive to Costa Pacifica Way segment, and an increase of 0.06 V/C at the Costa Pacifica Way to SR-76 segment. Thus, this alternative would avoid the project's cumulative impact to North Coast Highway, Harbor Drive to Costa Pacifica Way. While this alternative would continue to result in a significant and not mitigated impact to the North Coast Highway, Costa Pacifica Way to SR-76 segment, this impact would be lessened relative to the project.

Potential impacts to intersections, transportation-related general plan policies, and design hazards are discussed for this alternative due to the potential for increasing impacts compared to the proposed project. Due to the Reduced Footprint Alternative taking direct access to North Coast Highway, this alternative would have a potentially significant impacts related to intersection delay increases at North Coast Highway – I-5 southbound ramps/Harbor Drive, as well as a potential conflict with the City's Circulation Element Policies related to driveways.

As indicated by the City's Engineering Department, the City has a policy of only striping "Keep Clear" pavement markings at street intersections (and in front of driveways of first responders such as fire stations, police stations, etc., as allowed in the California Vehicle Code), and not in front of private driveways. Thus, the Reduced Footprint Alternative would not include such pavement markings and queuing on the North Coast Highway entrance would occur for vehicles turning into the site from the northbound direction. To avoid that potentially significant impact, access to/from the project site on North Coast Highway would be limited to right-turn in/out movements only.

With limited right-turn in/out only access at the North Coast Highway driveway, the majority of inbound project vehicles would take access from the southbound direction via exiting the I-5 at Harbor Drive. Under the Buildout 2035 condition without project, North Coast Highway – I-5 southbound ramps/Harbor Drive would operate at unacceptable LOS F. With the addition of the Reduced Footprint traffic to this intersection, the delay would increase 6.7 seconds (Appendix H). This increase in delay would exceed the City's two second threshold and would be considered a significant impact.

Table 8-2
Reduced Footprint Alternative
Roadway Segment Level of Service

Roadway Segment	Classification	LOS "E" ADT	Baseline			Alt Traffic	Baseline plus Project			Change in V/C	Impact?
			ADT[1]	*V/C*[2]	*LOS*[3]		*ADT*[1]	*V/C*[2]	*LOS*[3]		
Existing Conditions											
Coast Hwy, Costa Pacifica Way to SR-76	Collector Road (with TWLTL)	15,000	11,300	0.75	D	919	12,219	0.81	D	0.06	No
Existing Plus Cumulative											
Coast Hwy, Costa Pacifica Way to SR-76	Collector Road (with TWLTL)	15,000	11,800	0.79	D	919	12,719	0.85	D	0.06	No
Buildout Year (2035)											
Coast Hwy, Harbor Dr to Costa Pacifica Way	Collector Road (with TWLTL)	15,000	17,300	1.15	**F**	102	17,402	1.16	**F**	0.01	No
Coast Hwy, Costa Pacifica Way to SR-76	Collector Road (with TWLTL)	15,000	15,400	1.03	**F**	919	16,319	**1.09**	**F**	**0.06**	**Yes**

Source: Appendix H
Note: Capacity and LOS based is on City of Oceanside Roadway Segment LOS Thresholds
1 ADT – Average Daily Traffic
2 V/C – Volumes to Capacity Ratio
3 LOS – Level of Service

This alternative would also potentially conflict with General Plan Circulation Element Policy 3.9 related to driveway access. As detailed in Section 4.5, this transportation policy is related to eliminating or reducing driveway access along collectors and busier streets such as North Coast Highway. As the Reduced Footprint Alternative would include a driveway along a busy street for sole site access, this is considered a conflict with this General Plan Circulation Element Policy 3.9. As shown in the analysis above, this conflict would result in secondary physical impacts, and this would be a potentially significant land use impact.

Therefore, this alternative would result in greater transportation impacts related to intersections, transportation-related general plan policies, and design hazards compared to the proposed project.

Air Quality

The Reduced Footprint Alternative would include construction that would generate TACs in proximity to sensitive receivers (i.e., adjacent residential uses); however, the TACs generated would be less than the project considering the construction area would be reduced and the construction time period would be reduced. In addition, this alternative would move construction activities further from the adjacent sensitive receivers to the west, and would therefore reduce exposure to those sensitive receptors to TACs.

The California Air Resources Board (CARB) encourages consideration of the health impacts of freeways and high-traffic roadways on sensitive receptors sited within 500 feet (CARB 2005). This alternative would include residential uses within 500 feet from the nearest freeway. Thus, this alternative would result in an air quality impact related to the exposure of future residents to TACs similar to the project.

8.4.3.3 Relation to Project Objectives

The Reduced Footprint Alternative would meet project Objectives 1, 2, 5, 7, and 8, as the alternative would provide revitalization Downtown Oceanside, provide consistent frontage improvements, provides amenities (although reduced relative to the project), screens parking and provides visual massing reliefs, and provides both visitor-serving and residential-serving commercial. As this alternative wouldn't provide market rate housing at the General Plan density or affordable housing pursuant to a Density Bonus, it wouldn't meet Objectives 3 or 4. This alternative would not meet Objective 6, as it would not include the efficient use of land considering the entire urban infill site would not be developed. This alternative would also not meet Objective 9, as it would not include a street-facing plaza intended to activate the streetscape and pedestrian corridor. . Overall, this alternative would meet the basic project objectives.

8.5 Environmentally Superior Alternative

Table 8-3 outlines the comparative impacts between each alternative and the proposed project. The No Project (No Build) Alternative would result in the least environmental impacts and would be the environmentally superior alternative. However, CEQA Guidelines, Section 15126.6(e)(2), states that if the environmentally superior alternative is the "no project" alternative, the EIR also must identify an environmentally superior alternative among the other alternatives. While the No Project alternatives would reduce impacts relative to the project, neither would meet the majority of the basic project objectives. Thus, the environmentally superior alternative is the Reduced Footprint Alternative as it would reduce project impacts while meeting the majority of project objectives. However, it should be noted that the Reduced Footprint Alternative would result in greater impacts to geology and soils, and transportation (General Plan policies, hazards and intersections) than the project.

Table 8-3
Comparative Summary of Alternatives Under Consideration and Proposed Project

Alternative	Impacts									
	Biological Resources		*Cultural Resources*	*Geology and Soils*	*Noise*	*Tribal Cultural Resources*	*Transportation*		*Air Quality*	
	BIO-1/ BIO-3: Nesting Birds	*BIO-2/ BIO-4: Raptor Foraging and NNG*	*CUL-1: Archaeological Resources*	*GEO-1: Paleontological Resources*	*NOI-1: Construction Noise*	*TCR-1: Tribal Cultural Resources*	*TRF-1 and TRF-2: Roadway Segments-*	*General Plan Policies, Hazards and Intersections*	*AQ-1: TACs Exposure During Construction*	*AQ-2: Operational TACs Exposure*
No Project (No Build)	Less	Less	Less	Less	Less	Less	Less	Less	Less	Less
No Project (Development Per Entitlements)	Less	Less	Less	More	Less	Less	Less	Less	Less	Less
Reduced Footprint	Less	Less	Less	More	Less	Less	Less	More	Less	Same

"Less" = reduced impact relative to the project
"Same" = similar impact relative to the project
"More" = greater impact relative to the project

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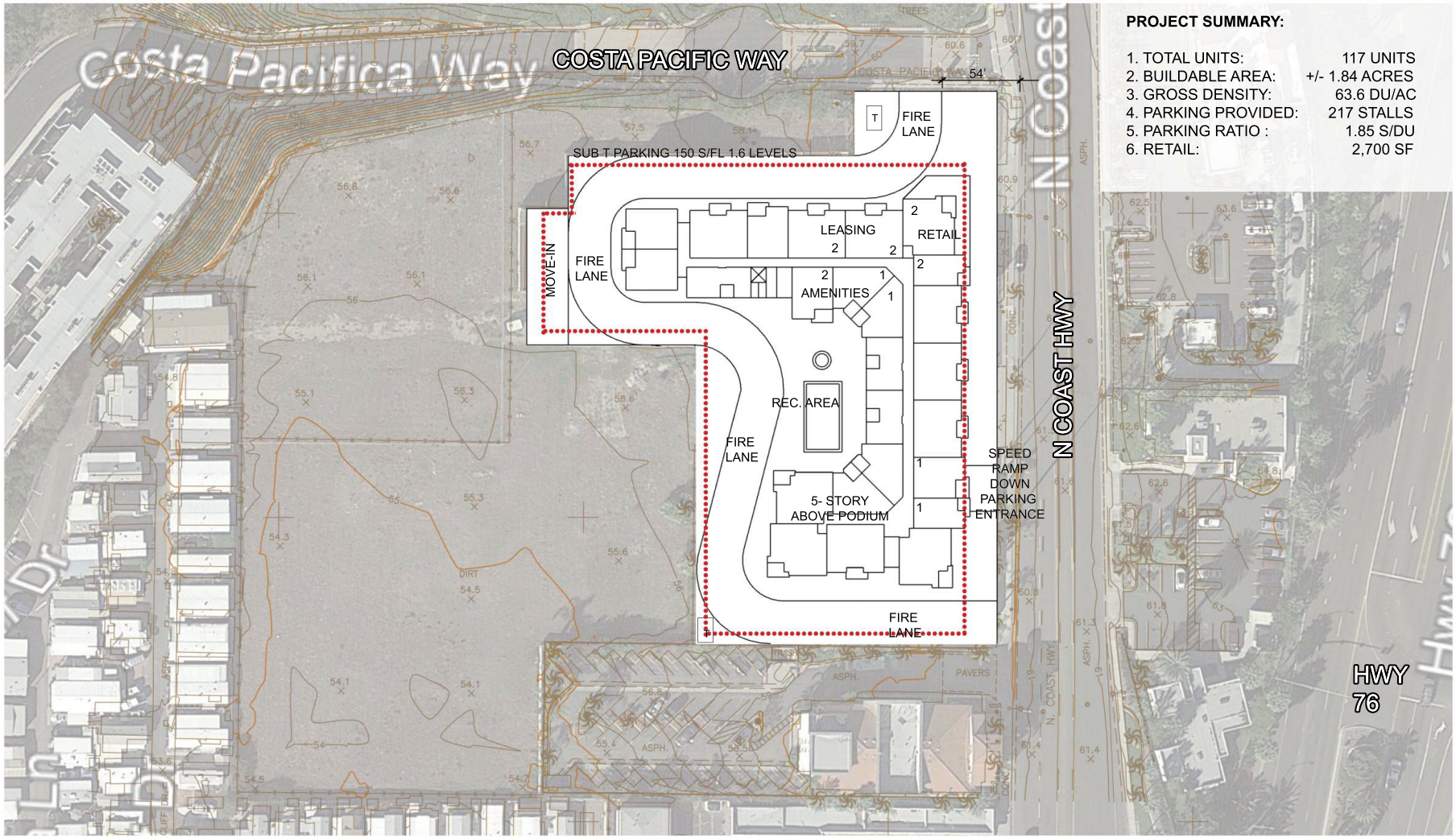

SOURCE: Architects Orange, 2019

FIGURE 8-1

Reduced Footprint Alternative

Alta Oceanside Project

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