

5.0 ALTERNATIVES

5.1 INTRODUCTION

The California Environmental Quality Act requires that an EIR include a discussion of reasonable project alternatives that would “feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any significant effects of the project, and evaluate the comparative merits of the alternatives” (*CEQA Guidelines*, Section 15126.6). This chapter identifies potential alternatives to the proposed *Sustainable Santee Plan: The City’s Roadmap to Greenhouse Gas Reductions* (“Sustainable Santee Plan” or “proposed project”) and evaluates them as required by CEQA.

Key provisions of the *CEQA Guidelines* on alternatives (Section 15126.6[b] through [f]) are summarized below to explain the foundation and legal requirements for the alternatives analysis in the EIR:

- The discussion of alternatives shall 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 these alternatives would impede to some degree the attainment of the project objectives or would be more costly (15126.6[b]).
- The specific alternative of “no project” shall also be evaluated along with its impact (15126.6[e][1]). The “no project” analysis shall discuss the existing conditions at the time the Notice of Preparation is published and at the time the environmental analysis is commenced, as well as what would reasonably be 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. If the environmentally superior alternative is the “no project” alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives (15126.6[e][2]).
- The range of alternatives required in an EIR is governed by the “rule of reason” that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision-making. Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site (or the site is already owned by the proponent) (15126.6[f]).
- For alternative locations, only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR (15126.6[f][2][A]).
- If the lead agency concludes that no feasible alternative locations exist, it must disclose the reasons for this conclusion and should include the reasons in the EIR. For example, in some

cases, there may be no feasible alternative locations for a geothermal plant or mining project, which must be in close proximity to natural resources at a given location (15126.6[f][2][B]).

- An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative (15126.6[f][3]).

5.2 PROJECT OBJECTIVES

As stated in Section 3.0, Project Description, the objectives set forth below have been established for the Sustainable Santee Plan and would aid decision-makers in their review of the proposed project and its associated environmental impacts:

1. Present the City’s plan for achieving sustainability by utilizing resources effectively, reducing GHG emissions, and preparing for potential climate-related impacts.
2. Identify how the City will effectively implement this proposed project by obtaining funding for program implementation, and tracking and monitoring the progress of Sustainable Santee Plan implementation over time.
3. Allow streamlined CEQA compliance for new development by preparing a PEIR for the Sustainable Santee Plan and developing screening tools that provide clear guidance to developers and other project proponents.
4. Maintain economic competitiveness within the region.

5.3 SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS IDENTIFIED FOR THE PROPOSED PROJECT

No significant unavoidable adverse impacts were identified for the proposed project.

5.4 ALTERNATIVES UNDER CONSIDERATION

Section 21100 of the Public Resources Code and Section 15126.6 of the *CEQA Guidelines* require an EIR to identify and discuss a No Project Alternative and a reasonable range of alternatives to the proposed project that would feasibly attain most of the basic objectives of the proposed project and that would avoid or substantially lessen any of the significant environmental impacts.

Public comments during the Notice of Preparation and Scoping Meeting focused on including an analysis of a Sustainable Santee Plan that accelerated the reduction of greenhouse gases to try and achieve a carbon-neutral goal for the City by 2030. To facilitate this analysis, the Accelerated Reduction Program Alternative was selected to evaluate how this alternative might avoid or lessen environmental impacts.

Therefore, the alternatives considered in this EIR consist of the following:

- **Alternative 1: No Project.** The No Project Alternative represents a continuation of development occurring under the City’s existing General Plan (adopted in 2003) without the adoption of the Sustainable Santee Plan.

- **Alternative 2: Accelerated Reduction Program Alternative.** This alternative would include more aggressive GHG reduction goals that match the State’s 2050 goal to be implemented by 2030.

5.4.1 Alternative 1: No Project/No Plan Alternative

5.4.1.1 Description of Alternative

The Sustainable Santee Plan will be used together with the City’s General Plan to guide sustainable development into the future. Therefore, this alternative analyzes the environmental effects that could occur if the Sustainable Santee Plan were not implemented and development proceeded under the existing General Plan. Only those issue areas that are discussed in the EIR technical sections are analyzed below.

While the General Plan includes several policies related to resource conservation, it lacks the specificity of program development contained in the Sustainable Santee Plan. Under the No Project Alternative, strategies and actions that implement those policies would not be implemented. Measures that would result in the creation of a Bicycle Master Plan (Measure 5.2) and traffic signal and outdoor lighting retrofits (Measure M-3.1) would not be implemented. Other actions that would increase building energy efficiency and water use efficiency would not be implemented, and efforts to reduce waste would be less intensive and less coordinated. Overall, the No Project Alternative would result in fewer actions and measures to reduce GHG emissions and less coordinated and presumably less effective implementation of the General Plan’s goals and policies to address climate change.

Without the Sustainable Santee Plan, it is uncertain whether the City would achieve its GHG reduction targets of 15 percent below 2005 levels by year 2020 and 49 percent below 2005 levels by the year 2035. Under the No Project Alternative, emissions reductions would occur with implementation of legislation adopted at the State level; however, there would likely be a gap in emissions reduction potential, which the Sustainable Santee Plan is intended to fulfill.

Aesthetics. Development would continue to occur under the existing General Plan, without implementation of the proposed project. Future development would not result in degradation of visual character or quality of the City, as all development would be required to comply with Santee municipal development review criteria and procedures to determine the development projects’ consistency with the Zoning Code, Municipal Code, and General Plan. Among the aspects of development regulated by the Santee Municipal Code are types of allowable land uses, setback and height requirements, solar, landscaping, walls, fencing, signage, access, parking requirements, storage areas, and trash enclosures. Thus, the impact from future development on visual character and quality would be less than significant, similar to the proposed project. Additionally, while the Sustainable Santee Plan could result in glare from energy-generating structures, glare could also result from sharply reflected light caused by sunlight or artificial light reflecting from highly finished surfaces such as window glass or brightly colored surfaces, which could result from implementation of the General Plan. Therefore, similar to the proposed project, implementation of the General Plan could require mitigation measures to reduce the impacts of glare.

Air Quality. Development would occur under the existing General Plan, without implementation of the proposed project. The current AQMP relies on information from the ARB and SANDAG. The ARB

mobile source emissions projections and SANDAG growth projections are based on population and vehicle trends and land use plans developed by the cities and by the County as part of the development of their general plans. As such, projects that propose development consistent with the growth anticipated by the general plans would be consistent with the AQMP and SANDAG regional plans. The Sustainable Santee Plan is intended to reduce greenhouse gas emissions in compliance with AB 32 and subsequent State legislation. Specific measures would be implemented that are in addition to the policies in the General Plan and would facilitate achievement of this goal. Without implementation of the Sustainable Santee Plan, there would be less formalized citywide guidance to reduce greenhouse gas emissions. While these reduction strategies were formulated to reduce greenhouse gases, they also act to improve overall air quality by reducing emissions of criteria pollutants. The goals and measures of the Sustainable Santee Plan being incorporated at the City level provide additional reductions in greenhouse gas emissions and improvements in air quality. Thus, while this alternative would not conflict with or obstruct implementation of the applicable air quality plan, it would have less of a beneficial effect compared to the proposed project.

Biological Resources. Development would occur under the existing General Plan, without implementation of the proposed project. Future development would not result in conflicts with provisions of an adopted HCP, NCCP, or other approved local, regional, or State HCP, as once the Subarea Plan is adopted, any future development projects that would implement the General Plan would be subject to all applicable City regulations and requirements, as well as subject to further CEQA analysis of project-specific impacts. Thus, the impact from future development conflicting with habitat conservation plans would be less than significant, similar to the proposed project.

Greenhouse Gas Emissions. The Sustainable Santee Plan is intended to reduce greenhouse gas emissions in compliance with AB 32 and the California Air Resources Board's Climate Change Scoping Plan. Specific measures would be implemented that are in addition to the policies in the General Plan that would facilitate achievement of this goal. Without implementation of the Sustainable Santee Plan, there would be less formalized citywide guidance to reduce greenhouse gas emissions. The Sustainable Santee Plan not only provides an emissions inventory and reduction measures, it provides a vehicle through the use of screening tables for determining the success of these measures and demonstrating compliance with the applicable State regulations. Without the Sustainable Santee Plan, there is no formal vehicle for demonstrating compliance with State law, even though existing City policies promote sustainability and would have the effect of reducing greenhouse gas emissions. Thus, this alternative would have less of a beneficial effect and could have a potentially significant impact related to greenhouse gas emissions compliance compared to the proposed project.

Hazards and Hazardous Materials. Development under the General Plan could still include structures in the ALUCP area of both Gillespie Field and MCAS Miramar Airports. Additionally, as described under Aesthetics, glare could also result from implementation of the General Plan, which could affect aircraft safety. Therefore, similar to the proposed project, all proposed development projects would require review by the San Diego County Regional Airport Authority to ensure continuing aircraft safety and implementation of the General Plan could also require mitigation measures to reduce the impacts of glare to less than significant.

Land Use and Planning. The current AQMP relies on information from the ARB and SANDAG. The ARB mobile source emission projections and SANDAG growth projections are based on population and vehicle trends and land use plans developed by the cities and by the County as part of the development of their general plans. As such, projects that propose development consistent with the growth anticipated by the general plans would be consistent with the AQMP and SANDAG regional plans. Additionally, any future development projects that would implement General Plan would be subject to all applicable City regulations and requirements, including specific plans, as well as HCPs and ALUCPs, and additional CEQA analysis of project-specific impacts. Therefore, implementation of the General Plan would not result in any conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project. However, without adoption of the aggressive reduction policies in the Sustainable Santee Plan, the City's General Plan may not be in compliance with State regulations to reduce GHG emissions, or may not be able to demonstrate to the ARB's satisfaction that it has done so. The Sustainable Santee Plan ensures that the City is in compliance with AB 32 and EO S-3-05. Thus, continuation of the existing General Plan without implementation of the Sustainable Santee Plan would not result in the same beneficial effects of plan compliance, although it would result in a similar less than significant impact with respect to consistency with other identified land use plans.

Wildfire. This area was added to the CEQA Guidelines in December 2018 after the publication of the NOP/IS for the Sustainable Santee Plan. This area of review was added to the PEIR and is discussed in Section 4.7 of this PEIR. The impacts of the project could be reasonably expected to generate the planting of additional trees to reduce the urban heat island effect on the developed portions of Santee where the majority of the land surface is covered with buildings or paving. Trees planted to reduce the urban heat island effect, mostly would be located in the center or developed areas of the City and not within the Very High Fire Hazard Severity Zones located at the periphery of the city. In addition such trees would be native and drought resistant thereby less susceptible to fire. Therefore, the project would have a less than significant impact on wildfire.

5.4.1.2 Attainment of Project Objectives

Without adoption and implementation of the Sustainable Santee Plan, there would be no plan that lays out measures and actions for achieving sustainability by utilizing resources effectively and reducing GHG emissions, or strategies for preparing for potential climate-related impacts. Additionally, there would be no plan laying out implementation steps to support achievement of the energy efficiency and GHG reduction goals. There would also be no policy document to be referred to during the planning process for future development projects. The list of specific actions to reduce GHG emissions would not be available. Furthermore, there would be no plan from which future developments could streamline CEQA compliance. Lack of a plan to meet the State's GHG gas reduction goals may make Santee less economically competitive as business owners and residents increasingly prefer locations and homes that require less electricity and energy uses (and as a result, are less expensive to supply with electricity and energy) and that have less impact on the environment. Therefore, this alternative would not meet any of the objectives of the proposed project.

5.4.2 Alternative 2: Accelerated Reduction Program Alternative

5.4.2.1 Description of Alternative

Alternative 2 would include more aggressive GHG Reduction goals that match the State’s 2050 goal to be implemented by 2030. The 2050 goal as described in Executive Order S-3-05 is to get statewide emissions 80 percent below 1990 levels by 2050. In addition to these GHG emission reductions, Executive Order B-55-18 has established a new statewide goal of carbon neutrality as soon as possible and no later than 2045. Carbon neutrality refers to achieving net zero carbon emissions by balancing a measured amount of carbon emissions with an equal amount that is sequestered or offset. These are two separate but related targets.

Statewide emissions include intra-state aviation, water-borne transportation, and some unique industrial processes that will require continued GHG emissions. To achieve Carbon Neutrality and to achieve a reduction of GHG emission to 80% below 1990 levels, other State-wide carbon emission sectors would have to achieve zero carbon emissions and buy carbon sequestration credits.

To implement the goals of Carbon Neutrality and a 80% reduction in GHG emissions at the City level actions would include 1) adoption of zero net energy standards for all new construction earlier than planned; 2) retrofitting many existing building with energy savings measures; 3) be a member of a Community Choice Aggregation program, Investor Owned Utility or other energy provider that achieves 100% renewable energy.

Alternative 2 would require the GHG reductions in a shorter time frame. This Alternative would not benefit from technological and regulatory changes that would over a longer time frame. Therefore, the required reductions would involve more local effort. For example everyone living in, working in, and visiting the City could have to own and travel in an electric vehicle or find alternative transportation such as walking or biking. This could also apply to the bus system and heavy-duty trucks that transport goods to and from the City. Since on-road transportation accounts for 60% of all GHG emissions in the City, combustion engines would be banned (e.g., portable generators, lawn mowers, scooters, motorcycles, cars, and trucks) within the City unless carbon credits could offset these emissions.

Alternative 2 would also require that wastewater treatment be contained in covered tertiary treatment with methane capture systems. Methane is a GHG. To achieve GHG or Carbon Neutrality, the water treatment plant would have to be covered to capture these gases or credits purchased to mitigate such emissions. Additionally, all electricity would need to be generated by solar photovoltaic (“PV”) or other zero-emission renewable sources. This would require advanced energy storage systems to provide electricity 24 hours, seven days a week regardless of renewable generation, at any given time. Some of this advanced energy storage capacity is just coming online and may not be economically feasible to be placed near every PV system by 2030.

Alternative 2 would require the GHG reductions in a shorter time frame. This Alternative would not benefit from technological and regulatory changes that would over a longer time frame. Therefore, the required reductions would involve more local effort. Alternative 2 could require all existing buildings and industrial land uses retrofitted to become zero-emission land uses, requiring PV solar retrofits, energy efficiency retrofits, and replacement of all appliances (e.g., no gas appliances). The

City has the opportunity to implement this requirement 1) at point of sale during real estate transactions or 2) when a property owner applies for building or discretionary permit from the City . Alternatives, to this process would be to purchase carbon offset credits. In order to meet the reduction goals all existing land uses would need to change owners, apply for a building or discretionary permit from the City or existing owners would need to voluntarily retrofit their properties so that 100 percent of buildings (businesses and residential land uses) are retrofitted by 2030. It would be unlikely that all of Santee's approximately 19,000 parcels would fall into one of these scenarios by the year 2030.

Aesthetics. Implementation of Alternative 2 would involve incorporation of renewable energy-generating systems in new construction to meet the aggressive zero city emissions by 2030. These systems include solar panels, photovoltaic arrays, and energy-saving components such as cool roofs, similar to the proposed project, as well as larger renewable energy projects. As with the proposed project, future development under Alternative 2 would be required to comply with the Santee municipal development review criteria and procedures to determine the development projects' consistency with the Zoning Code, Municipal Code, and General Plan. However, implementation of Alternative 2 would likely result in more energy-generating systems on rooftops, as well as larger renewable energy projects that would likely affect the visual character of the surrounding community. Thus, the impact from future development under Alternative 2 would be significant. Similar to the proposed project, implementation of Alternative 2 could require mitigation measures to reduce the impacts of glare of smaller renewable energy-generating systems. Unlike the proposed project, this impact would be potentially significant and unavoidable under Alternative 2.

Air Quality. Alternative 2 is intended to implement the State's 2050 goal by 2030. The 2050 goal, as described in Executive Order S-3-05, is to reduce statewide emissions to 80 percent below 1990 levels by 2050. As described above, because statewide emissions include intra-state aviation and some unique industrial processes that will require continued emissions, implementing this goal at a citywide level will require zero emissions from all sectors. Alternative 2 would reduce GHG emissions below the emissions reduction goals of AB 32 and SB 32. Specific measures would be implemented to supplement the policies in the General Plan and would facilitate achievement of zero citywide emissions. Similar to the proposed project, implementation of Alternative 2 would reduce regional criteria air pollutants emissions and is not expected to result in any long-term regional air quality impacts. Therefore, similar to the proposed project, Alternative 2 would not conflict with or obstruct implementation of the applicable air quality plan. Impacts would be less than significant.

Biological Resources. While development under Alternative 2 would likely result in the construction of more structures compared to the proposed project, it would not result in conflicts with provisions of an adopted HCP, NCCP, or other approved local, regional, or State HCP (once the Subarea Plan is adopted). While Alternative 2 would result in development of more and larger renewable energy projects than the proposed project, all projects would still be subject to all applicable City regulations and requirements, as well as subject to further CEQA analysis of project-specific impacts. Thus, the impact from future development conflicting with habitat conservation plans would be less than significant, similar to the proposed project.

Greenhouse Gas Emissions. Alternative 2 is intended to implement the State's 2050 goal by 2030. The 2050 goal as described in Executive Order S-3-05 is to have statewide emissions 80 percent

below 1990 levels by 2050. As described above, because statewide emissions include intra-state aviation and some unique industrial processes that will require continued emissions, implementing this goal at a citywide level will require zero emissions from all sectors. Alternative 2 would reduce GHG emissions below the emissions reductions goal of AB 32 and the ARB's Climate Change Scoping Plan. Specific measures would be implemented to supplement the policies in the General Plan and would facilitate achievement of zero citywide emissions. Therefore, similar to the proposed project, implementation of the Alternative 2 would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases. Impacts would be less than significant.

Hazards and Hazardous Materials. Development under Alternative 2 would likely result in the construction of more structures in the ALUCP area of both Gillespie Field and MCAS Miramar Airports compared to the proposed project. Additionally, as described under Aesthetics, glare could also result from implementation of Alternative 2, which could affect aircraft safety. While Alternative 2 would result in development of more and larger renewable energy projects than the proposed project, all proposed development projects would still require review by the San Diego County Regional Airport Authority to ensure continuing aircraft safety. Implementation of Alternative 2 could also require mitigation measures to reduce the impacts of glare to less than significant.

Land Use and Planning. As described above, under Air Quality, similar to the proposed project, implementation of Alternative 2 would reduce regional criteria air pollutant emissions and is not expected to result in any long-term regional air quality impacts. Therefore, similar to the proposed project, Alternative 2 would not conflict with or obstruct implementation of the applicable air quality plan. Additionally, any future development projects that would occur under Alternative 2 would be subject to all applicable City regulations and requirements, including specific plans, as well as HCPs and ALUCPs, and additional CEQA analysis of project-specific impacts. Therefore, implementation of Alternative 2 would not result in any conflict with an applicable habitat conservation plan or regulation of an agency with jurisdiction over the project. Additionally, the alternative's aggressive emissions reductions would be in compliance with State regulations (AB 32 and SB 32) and the California Governor's directive (EO S-3-05). Thus, Alternative 2 would result in a similar less than significant impact with respect to consistency with other identified land use plans.

Wildfire. This area was added to the CEQA Guidelines in December 2018 after the publication of the NOP/IS for the Sustainable Santee Plan. This area of review was added to the PEIR and is discussed in Section 4.7 of this PEIR. The impacts of the project could be reasonably expected to generate the planting of additional trees to reduce the urban heat island effect on the developed portions of Santee where the majority of the land surface is covered with buildings or paving. Trees planted to reduce the urban heat island effect, mostly would be located in the center or developed areas of the City and not within the Very High Fire Hazard Severity Zones located at the periphery of the city. In addition such trees would be native and drought resistant thereby less susceptible to fire. Therefore, the project would have a less than significant impact on wildfire.

5.4.2.2 Attainment of Project Objectives

While Alternative 2 would reduce GHG emissions at a quicker pace, it would not meet two objectives of the project. Objective #2 seeks to identify how the City will effectively implement the Sustainable Santee Plan by obtaining funding for program implementation and tracking and monitoring the progress of Plan implementation over time. The Alternative to accelerate GHG reductions might outpace funding sources such as grants which are designed and timed to achieve State mandates. Many State grant programs are tied to specific and timed achievement of State objectives. If Santee is ahead of this schedule, certain measures would not be eligible for available grants and would require the use of general Funds. This would put strain on the City’s ability to fund such a program.

Alternative 2 requires that an energy provider achieve 100% renewable energy by 2030. Current renewable energy rates for the existing CCAs are averaging around 70%. It might be infeasible of achieving 100% renewable energy sourcing by 2030 as the growing number of CCAs may outstrip clean energy production. In addition, many long term contracts with non-renewable sources may remain in place for extended periods of time.

Alternative 2 would also require GHG emission reductions at an accelerated pace than surrounding jurisdictions. Depending on the GHG reduction strategy, additional costs to the City and/or homeowner or business owner could be expected. In the short term, the costs of these GHG reduction strategies could place the City, homeowner, or business owner at an economic disadvantage when compared to surrounding jurisdictions. Homeowners and businesses which are cost-sensitive may choose other cities when deciding where to locate due to the cost of implementing GHG reduction measures. In addition certain measures (1.3) may only be triggered when properties are sold and it would be difficult to review all of the older residences by the year 2030. And lastly, Alternative 2 would result in significant and unavoidable aesthetic impacts due to larger renewable energy projects and other measures required to meet the more aggressive time line.

Alternative 2’s target year of 2030 does not provide sufficient time for these improvements to occur. Therefore, Alternative 2 would not meet the objectives of the proposed project.

Table 5.A: Comparison of the Environmental Impacts of the Proposed Project to the Project Alternatives

Environmental Topic	Level of Impacts After Mitigation		
	Proposed Project	Alternative 1: No Project/No Development Alternative	Alternative 2: Accelerated Reduction Program Alternative
Aesthetics	Less than Significant	Less than Significant	Potentially Significant
Air Quality	Less than Significant	Less than Significant	Less than Significant
Biology	Less than Significant	Less than Significant	Less than Significant
Greenhouse Gas Emissions	Less than Significant	Potentially Significant	Less than Significant
Hazards and Hazardous Materials	Less than Significant	Less than Significant	Less than Significant
Land Use and Planning	Less than Significant	Less than Significant	Less than Significant

Table 5.A: Comparison of the Environmental Impacts of the Proposed Project to the Project Alternatives

Environmental Topic	Level of Impacts After Mitigation		
	Proposed Project	Alternative 1: No Project/No Development Alternative	Alternative 2: Accelerated Reduction Program Alternative
Attainment of All Project Objectives	Meets all of the Project Objectives	Meets None of the Project Objectives	Meets two of the four Project Objectives

5.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

The No Project/No Plan Alternative and Alternative 2 would not be environmentally superior to the proposed project on the basis of the minimization or avoidance of physical environmental impacts. With respect to GHG emissions, the No Project/No Plan Alternative would have potentially greater and possibly significant impacts. With respect to Aesthetics, the Accelerated Reduction Program Alternative would have potentially significant impacts. Therefore, according to the above analysis and as summarized in Table 5.A, the proposed project would be the preferred, Environmentally Superior Alternative.