

CHAPTER 4 PROJECT ALTERNATIVES

4.1 Introduction

This section summarizes The Villages – Escondido Country Club Project (Project) to allow for an evaluation of its comparative merit with a range of reasonable potentially feasible alternatives. The Project proposes the development of 392 single-family homes in three interrelated villages with related resident amenities and the concurrent development and dedication of 48 acres of open space with greenbelts, parks, and community amenities. Please refer to Chapter 1, Project Description, for a complete description of the Project. The potentially significant impacts relating to construction and/or operation of the Project were identified in connection with air quality, biological resources, cultural resources, GHG emissions, hazards and hazardous materials, noise, and transportation and traffic. With the implementation of the identified mitigation measures prescribed in this Environmental Impact Report (EIR), all potentially significant impacts would be mitigated to less than significant levels with the exception of one traffic impact, which would remain significant and unavoidable. The Project would result in a significant unavoidable long-term cumulative traffic impact at the Interstate 15 (I-15) southbound on-ramp at El Norte Parkway. Although mitigation is proposed to reduce this impact, it is considered a significant unavoidable impact, even with the identified mitigation improvements because the improvements are located within the jurisdiction and responsibility of the California Department of Transportation (Caltrans), and neither the applicant nor the City of Escondido can ensure that Caltrans will permit the improvement to be made. Nonetheless, the proposed mitigation improvements are considered feasible to implement and both the applicant and City will continue to coordinate with Caltrans to complete the mitigation improvements should the proposed project be approved. If Caltrans subsequently concurs and authorizes such improvements, they would eliminate the identified significant impact at the referenced on-ramp.

4.2 Scope and Purpose

Section 15126.6(a) of the California Environmental Quality Act (CEQA) Guidelines requires that an EIR “describe a range of reasonable alternatives to the 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” (14 CCR Section 15126.6a). 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, but is not required to consider alternatives that are infeasible. There 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. CEQA requires consideration of a “No Project” alternative to allow decision makers to compare the impacts of approving the project with the impacts of not approving the project (14 CCR Section 15126.6(e)).

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. Further, CEQA requires that an EIR identify the environmentally superior alternative from among the alternatives.

This EIR has evaluated the Project’s potential significant impacts in numerous environmental categories. This information allows the Project to be compared against the merits of each alternative.

4.3 Criteria for Selection, Analysis, and Feasibility of Alternatives

The criteria for the selection and analysis of alternatives are provided in CEQA Guidelines, Section 15126.6(c). The alternatives must (1) meet most of the Project objectives, (2) be feasible, and (3) avoid or substantially lessen any significant impacts of the project. The Project objectives are contained in Chapter 1 of this EIR and listed below.

The underlying purpose of the Project is to revitalize an existing residential area surrounding the Escondido Country Club community, and to develop a new community with unique homes and interrelated open space and recreation amenities on 109 acres near existing and planned infrastructure, services, and jobs in the vicinity of the North San Diego County Interstate 15 (I-15) corridor. Project implementation is guided by the following statement of Project objectives:

1. Eliminate the blighted condition of the current Project site and abate hazards to public health and safety.
2. Assist the City in implementing the General Plan’s housing goals by increasing the City’s housing stock and diversifying the range of housing opportunities.
3. Provide a variety of housing types and designs within interrelated villages located adjacent to an existing, established residential community.
4. Create an interrelated open space system including a greenbelt with walking trails, pocket parks, and landscape areas, in addition to active recreation facilities, to facilitate an active and healthy lifestyle for residents, thereby assisting the City in implementing the General Plan’s community health and services goals.

5. Provide a place for the community to gather, socialize, dine, and recreate thereby assisting the City in implementing the General Plan's community health and services goals.
6. Provide a Specific Alignment Plan as part of the Project that would provide a series of intersection improvements designed to calm traffic speeds and enhance pedestrian and bicycle circulation.
7. Protect privacy of existing residents by providing a landscaped buffer between all new and existing homes.
8. Implement sustainable design measures to enhance walkability, minimize water usage for both interior and exterior facilities, and maximize energy-saving features; and cluster residential within established single-family villages or neighborhoods to maintain site topography, protect natural resources, and avoid hazards consistent with the City's land use goals.
9. Implement timely public facilities within existing service areas without burden or cost to existing residents, visitors, or North San Diego County incorporated and unincorporated communities.

According to CEQA Guidelines, Section 15126.6(b), the alternatives analysis should focus on those alternatives that, if implemented, could eliminate or reduce any of the project's significant environmental impacts. The alternatives will be evaluated to determine if, as anticipated when selected as alternatives, they actually eliminate any significant environmental effects or reduce them to a less-than-significant level. The Project-related impacts are considered to be those that are identified prior to the incorporation or implementation of any mitigation measures.

The potential impacts of the alternative relative to the Project will be evaluated to determine the "comparative merits of the alternatives." (CEQA Guidelines section 15126.6(a).) This analysis will be based, in part, on a comparison to the Project's impacts. It also will include a discussion of the relative feasibility of each alternative.

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.

In determining the nature and scope of alternatives to be examined in an EIR, CEQA and the case law have stated that local agencies must be guided by the doctrine of “feasibility.” As defined by CEQA, “feasible” means “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors.” (Public Resources Code Section 21061.1; see also 14 CCR Section 15364 [same definition but with the addition of “legal” factors].) The concept of feasibility under CEQA also encompasses “desirability” to the extent that desirability is based on a reasonable balancing of the relevant economic, social, technological, and other factors.¹

4.4 Rationale for the Selection of Alternatives

The criteria discussed above and information received during the CEQA Notice of Preparation and scoping process were used to select alternatives to the Project.

The “No Project” alternative must be evaluated along with any impacts (14 CCR §15126.6(e)(1)). If the environmentally superior alternative is the “No Project” alternative, the EIR must identify an environmentally superior alternative among the other alternatives (14 CCR Section 15126(e)(2)). (See Table 4-1, Environmentally Superior Alternative, for a comparison of the alternatives.) In addition, the EIR must identify any alternatives that were considered but rejected by the lead agency, and briefly explain the reasons behind the lead agency’s rejection determination.

An EIR need not evaluate the environmental effects of alternatives in the same level of detail as the project, but must include enough information to allow meaningful evaluation, analysis, and comparison with the project. The alternatives discussion is intended 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 these alternatives would impede to some degree the attainment of the Project objectives.

In addition to the “No Project” alternative, the Escondido Country Club Homeowners’ Association (ECCHO) proposed two reduced-density alternatives during the public scoping process. Each of these alternatives is evaluated in this EIR, in addition to a Reduced-Density 279 Unit Alternative.

¹ See *City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3rd 401, 417.

4.5 Alternatives Considered but Rejected from Further Analysis

Alternative Project Location

In accordance with CEQA Guidelines Section 15126.6(f)(2), an alternative location for a project should be considered if development of another site is feasible and if such development would avoid or substantially lessen the significant impacts of the project. Factors that may be considered when identifying an alternative site location include the size of the site, its location, the General Plan (or Subregional Plan) land use designation, and availability of infrastructure. CEQA Guidelines Section 15126.6(f)(2)(A) states that a key question in addressing an off-site alternative is “whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location.”

If another parcel within the City limits were to become available, development of the alternative site would likely result in the same or similar impacts as those identified in this EIR for the Project. Those impacts include, among others, traffic, noise, and air quality. Selection of another alternative location may avoid impacts to biological resources, cultural resources, and geology and soils, which are site-specific; however, such impacts associated with the Project were found to be less than significant with mitigation. Additionally, the Project site is in an area surrounded by residential development and thus constitutes infill and avoids inducing sprawl. In this way, the Project site helps to avoid environmentally sensitive areas and minimizing impacts to these other valued lands while aiding the City to meet their housing needs. Thus, another alternate site location is not likely to substantially reduce significant environmental effects as to those resources when compared to the Project site. In addition, while only a factor, the applicant has stated that it cannot reasonably acquire, control, or otherwise have access to an alternative site with the same or similar attributes as the Project site. In fact, the applicant targeted this specific site because of the need to revitalize the now dilapidated former clubhouse property, which creates an opportunity for positive change, and there are no similar alternative sites that would provide opportunities for positive change of this magnitude. There also is no other available property within the City that is in such a state of disrepair and also zoned residential.

Further, if an alternative site location were selected, the site would not address the need to revitalize the existing abandoned clubhouse property, along with its ongoing challenges with regard to maintenance and other public health, safety, and welfare concerns (e.g., overgrowth of vegetation, dying trees and other foliage due to lack of irrigation, unsightly areas adversely affecting neighboring properties). Additionally, as stated, the Project site is a former country club site, which has fallen into disrepair and is zoned for residential uses; and, thus, the Project’s underlying purpose would be frustrated by the selection of an alternative site. Relatedly, the visual quality of the existing site is characterized as low because the property’s existing conditions have deteriorated. Redevelopment of the site would eliminate the blighted condition

and abate hazards to public health and safety, which is one of the Project objectives. These unique site improvement opportunities would not be implemented on site if an alternative site location were selected. For these reasons, at this time, the alternative site location is not considered feasible or desirable.

Alternatives Considered

The Project alternatives evaluated include:

1. No Project/No Development Alternative
2. Two Reduced-Density Alternatives (158 and 138 Units)
3. Reduced-Density Alternative (279 Units)

4.6 Analysis of the No Project/No Development Alternative

4.6.1 No Project/No Development Alternative Description and Setting

CEQA requires an evaluation of the “No Project” alternative so that decision makers can compare the impacts of approving the Project with the impacts of not approving it. According to CEQA Guidelines section 15126.6(e), the No Project Alternative must include the assumption that conditions at the time of the Notice of Preparation (i.e., baseline environmental conditions) would not be changed since the Project would not be implemented.

The No Project/No Development alternative assumes that the Project would not be developed, which means there would be no residential, greenbelt, park, trail, and other community and recreation uses developed on site. Traffic improvements would not be constructed. None of Project site would be permanently preserved as open space. In its existing condition, the site would remain an unsightly, abandoned, former golf course/clubhouse property. Maintenance and abatement would continue to be required to ensure the public, health, safety, and welfare. Until developed for some purpose or use not yet known, portions of the existing site would continue to be used for unauthorized purposes, such as use of the site by transients and vandals for drug use and graffiti.

4.6.2 Comparison of the Effects of the No Project/No Development Alternative to the Project

In comparing the No Project/No Development Alternative to the Project, CEQA provides that the “lead agency should proceed to analyze the impacts of the no project alternative by projecting 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” (14 CCR 15126.6(e)(3)(C)).

Below, the No Project/No Development Alternative is compared to the Project as though it would remain in its existing condition; however, as noted under CEQA, the existing site, an abandoned former golf course facility, retains underlying General Plan land use designations and zoning. Thus, development of the existing site, consistent with available infrastructure and services, is a reasonably expected occurrence in the foreseeable future, even if the Project were not approved. As such, although no impacts are noted in the various environmental categories for the No Project/No Development Alternative as of this writing, it is reasonable to project future development on site because it is possible that the existing site would not remain in an undeveloped condition in the foreseeable future, and instead, another development proposal is may occur with same or similar impacts as identified for the Project. The Reduced Density Alternative (158 and 138 residential units) analyzed below represents alternatives that are consistent with the underlying zoning; see Section 4.7.

4.6.2.1 Air Quality

The Project would have a significant impact associated with construction emissions exceeding the City's significance threshold for NO_x and with respect to sensitive receptors. The Project would also conflict with the RAQS and SIP, without mitigation, because although the Project's proposed density would be consistent with the underlying growth projections of the General Plan, the existing land use (golf course) was included in the current RAQS, which did not provide growth in residential units, population, or vehicle trips. Although redesignation of this land use represents minor adjustments to the Project site (update of the zoning density), this new density would represent new designations that were not previously considered in the RAQS and SIP. All potentially significant impacts would be reduced to less than significant with mitigation (**M-AQ-1** and **M-AQ-2**). Under the No Project/No Development Alternative, no impacts to air quality would result at this time, because no development proposal currently exists that would result in construction and corresponding air quality impacts. For this reason, impacts to air quality would be less under this alternative when compared to the Project.

4.6.2.2 Biological Resources

The Project would result in potentially significant impacts to biological resources associated with the loss of protected trees, mature trees, riparian habitat, wetlands, and nesting birds. With implementation of mitigation measures, the identified biota impacts would be reduced to less than significant levels. Because no demolition or construction would occur, the No Project/No Development Alternative would not result in changes to biological resources at this time. No nesting birds would be disturbed and all existing trees and habitat would remain in place as of this writing, because of the absence of development. For this reason, impacts to biological resources would be less under this alternative when compared to the Project

4.6.2.3 Cultural Resources

Impacts to cultural resources would be less than significant with implementation of mitigation measures under the Project. Currently, the No Project/No Development Alternative would not disturb existing buildings or subsurface cultural resources or human remains as there is no development proposed at this time under this alternative. Under the No Project/No Development Alternative, no impacts to cultural resources would result at this time, because no development proposal currently exists that would result in construction and corresponding cultural impacts. For this reason, impacts to cultural resources would be less under this alternative when compared to the Project.

4.6.2.4 Greenhouse Gas Emissions

Impacts related to greenhouse gas (GHG) emissions would be less than significant with implementation of mitigation measures under the Project. Under the No Project/No Development Alternative, no impacts to GHG emissions would result at this time, because no development proposal currently exists under this alternative, and, thus, there would be no construction and no additional homes, vehicles, or other GHG-generating emissions would be introduced on the Project site. For this reason, GHG impacts would be less under this alternative when compared to the Project.

4.6.2.5 Hazards and Hazardous Materials

The Project would result in potentially significant impacts associated with hazards and hazardous materials; however, with implementation of mitigation measures, impacts would be reduced to less than significant.

Under the No Project/No Development Alternative, no hazard or hazardous materials impacts would result at this time, because no development proposal currently exists that would result in construction and corresponding hazards impacts. For this reason, hazards impacts would be less under this alternative when compared to the Project.

4.6.2.6 Noise

The Project identified potential traffic noise level impacts and construction noise level impacts. With implementation of mitigation measures, all impacts associated with noise would be reduced to less than significant under the Project.

Under the No Project/No Development Alternative, no construction or operation noise impacts would result at this time, because no development proposal currently exists that would result in

construction and corresponding operational noise impacts. For this reason, noise impacts would be less under this alternative when compared to the Project.

4.6.2.7 Transportation and Traffic

The Project proposes a Specific Alignment Plan (SAP) for Country Club Lane from Golden Circle Drive to Nutmeg Street. The SAP would provide a series of intersection improvements designed to calm traffic speeds and enhance pedestrian and bicycle circulation. Specifically, the SAP includes two roundabouts at Country Club Lane/Golden Circle Drive, and La Brea Street. Traffic signals with pedestrian crosswalks are proposed at Gary Lane and Nutmeg Street. Narrowed lanes and buffered bike lanes also are proposed.

In addition, under the Project, implementation of mitigation measures would reduce all transportation and traffic impacts to less than significant, with the exception of one impact which would remain significant and unavoidable. The Project would result in one significant unavoidable long-term cumulative impact at the I-15 southbound on-ramp at El Norte Parkway. The Project proposes to mitigate this impact by providing an additional single occupancy vehicle lane to the southbound on-ramp; however, since the on-ramp is a Caltrans facility, and outside of the City's jurisdiction and control. Thus, there is no assurance that the improvements will be implemented, which is why the impact is conservatively identified as significant and unavoidable in this EIR.

The No Project/No Development Alternative would not implement any of the traffic calming features proposed as part of the SAP for the Project. At the same time, the alternative would not introduce additional vehicles to the surrounding area and not result in any impacts on the existing transportation infrastructure, because no development proposal currently exists that would result in construction and operational traffic impacts. For this reason, traffic impacts would be less under this alternative when compared to the Project.

4.6.2.8 Project Objectives

The No Project/No Development Alternative would not meet any of the Project objectives. See Table 4-2, Comparison of Alternatives Relative to Project Objectives, for details.

4.7 Analysis of Two Reduced-Density Alternatives (158 and 138 Units)

4.7.1 Reduced-Density Alternatives (158 and 138 Units) Description and Setting

The ECCHO proposed the two reduced-density alternatives (158 and 138 residential units) during the EIR public scoping period. The reduced-density alternatives include two potential alternative developments. The first alternative would include the development of 158 residential

units (Figure 4-1A), and the second would include the development of 138 residential units (Figure 4-1B). Both alternatives would result in similar impacts compared to the Project. Therefore, they are analyzed together in this EIR. Although details were not provided for proposed ECCHO reduced-density alternatives, some assumptions are made based on the plans provided (Figures 4-1A and 4-1B). It is assumed the existing R-1-7 zoning would remain the same under the two reduced-density alternatives; therefore, all lots would be a minimum of 7,000 square feet. Although fewer units would be developed, the footprint of disturbance to construct the reduced number of residences would be roughly the same as the Project because the lot sizes would be larger. In addition to the residential development, there are green areas depicted in the plans. These areas would consist of necessary drainage facilities, BMPs, utilities to support the residential development and uses, as well as some passive open space. Lastly, although this alternative would not include the SAP, it would include bicycle and pedestrian improvements along Country Club Lane.

4.7.2 Comparison of the Effects of the Reduced-Density Alternatives to the Project

4.7.2.1 Air Quality

The Project would have a significant impact associated with construction emissions exceeding the City's significance threshold for NO_x and with respect to sensitive receptors. The Project would also conflict with the RAQS and SIP, without mitigation, because although the Project's proposed density would be consistent with the underlying growth projections of the General Plan, the existing land use (golf course) was included in the current RAQS, which did not provide growth in residential units, population, or vehicle trips. Although redesignation of this land use represents minor adjustments to the Project site, the residential land use would represent new designations on this site that were not previously considered in the RAQS and SIP. All potentially significant impacts would be reduced to less than significant with mitigation (**M-AQ-1** and **M-AQ-2**). Development would still occur under the two reduced-density alternatives, which would result in construction emissions similar to the Project; however, since fewer homes would be constructed under these alternatives, fewer emissions would occur over a shorter duration. Additionally, although slightly less grading and earthwork would be required because these alternatives do not include the SAP, the same type of equipment would be used and the amount of area disturbed would be only slightly less under these alternatives because the lot sizes would be larger. Air quality impacts would be slightly less and would remain less than significant with mitigation. Compared to the Project, the reduced-density alternatives would involve fewer units and operational traffic trips would be reduced by 67% under the 138-unit alternative and by 63% under the 158-unit alternative compared to the Project. However, similar to the Project, the reduced-density alternatives would have operational emissions that would not exceed the City's significance thresholds; therefore, they would result in a less than significant

impact during operation. Also similar to the Project, the reduced-density alternatives would result in an inconsistency with the RAQS and SIP without mitigation, because the existing land use (golf course) was included in the current RAQS. This impact would be reduced to less than significant with implementation of **M-AQ-1**.

4.7.2.2 Biological Resources

The Project would result in potentially significant impacts to biological resources associated with the loss of protected trees, mature trees, riparian habitat, wetlands, and nesting birds. With implementation of mitigation measures, impacts would be reduced to less than significant levels. Development would still occur under the reduced-density alternatives and although fewer units would be developed, the footprint of disturbance to construct the reduced number of residences would still result in impacts to biological resources and would be the same compared to the Project. Impacts to biological resources would not be reduced or avoided under the two alternatives.

4.7.2.3 Cultural Resources

The Project identified potential impacts associated with the possibility of uncovering previously undetected cultural resources, paleontological resources, and human remains. Each of these potential impacts would be less than significant with implementation of mitigation measures. Under the reduced-density alternatives, development with single-family homes would still occur and the potential to uncover cultural resources, paleontological resources, or human remains still exists. Although fewer units would be developed, the footprint of disturbance to construct the reduced number of residences would remain the same because lot sizes would be larger under these alternatives. Therefore, impacts would be the same compared to the Project. Impacts to cultural resources would not be reduced or avoided under the two alternatives.

4.7.2.4 Greenhouse Gas Emissions

Similar to air quality impacts, the GHG emission impacts of the reduced-density alternatives would be less than those of the Project during construction and operation. Development would still occur under the two alternatives, which would result in construction emissions similar to the Project; however, since fewer homes would be constructed under these alternatives, fewer emissions would occur over a shorter duration. Additionally, although slightly less grading and earthwork would be required because these alternatives do not include the SAP, the same type of equipment would be used and the amount of area disturbed would be only slightly less under these alternatives because the lot sizes would be larger. Compared to the Project, the reduced-density alternatives would involve fewer units and operational traffic trips would be reduced by 67% under the 138-unit alternative and by 63% under the 158-unit alternative compared to the Project. The reduced-density alternatives would also not include the Village Center and integrated walking and bicycling trail that would connect the villages with the Village Center and adjacent community and improve

the overall pedestrian network, which accounts for additional GHG emissions reductions. Although the reduced-density alternatives would generate less GHG emissions, they would still increase GHG emissions relative to existing conditions, so the impact determination would remain potentially significant. However, with mitigation (**M-GHG-1**), the GHG emissions impact would be less than significant under these alternatives, similar to the Project.

4.7.2.5 Hazards and Hazardous Materials

The Project would result in potentially significant impacts associated with hazards and hazardous materials. Two former USTs are located in the Project vicinity, as well as two floor drains and two clarifiers that would be potentially significant. In addition, the historic agricultural use of the property and the potential presence of asbestos-containing materials and lead based paint in the existing buildings represent a potentially significant impact. However, with implementation of mitigation measures, all impacts would be reduced to less than significant. The potentially hazardous conditions that were identified as part of the Project would still be present under the reduced-density alternatives; development would still be required to implement all mitigation measures to reduce potential impacts. Impacts to hazards and hazardous materials would not be reduced or avoided under these alternatives.

4.7.2.6 Noise

The Project identified potentially significant traffic and construction noise level impacts. With implementation of mitigation measures all impacts related to increased noise levels would be reduced to less than significant under the Project. It should be noted that even with no Project trips added, on-site exterior traffic noise levels experienced under the worst-case scenario (Year 2035 + Project) would remain significant without mitigation. Off-site traffic noise levels would be less than significant.

Development would still occur under the reduced-density alternatives. Construction noise levels would be slightly less; however mitigation would still be required to reduce impacts to less than significant. Operational traffic trips would be reduced by 67% under the 138-unit alternative and 63% under the 158-unit alternative compared to the Project. However, as previously stated, even if no Project trips were added, on-site exterior traffic noise levels experienced under the worst-case scenario (Year 2035 + Project) would still be significant; therefore, a trip reduction of 67% or 63% would not affect overall future noise exposure levels, or eliminate any of the required mitigation measures. For off-site traffic noise level impacts, the analysis concluded that impacts would be less than significant and not cumulatively considerable; therefore, a trip reduction of 67% or 63% under these alternatives would also result in a less than significant and not cumulatively considerable impact. Impacts would be the same as the Project and mitigation would still be required.

4.7.2.7 Transportation and Traffic

The Project would result in potentially significant impacts to two intersections, one street segment and one ramp meter under the Existing Plus Project scenario; one intersection and one street segment under the Existing plus Cumulative Projects plus Project scenario; and five intersections, one street segment, and one ramp meter under the Year 2035 Plus Project scenario. With implementation of mitigation measures, all such impacts would be reduced to less than significant with the exception of one impact, which would remain significant and unavoidable. The Project would result in a significant, unavoidable long-term cumulative impact at the I-15 southbound on-ramp at El Norte Parkway.

A SAP for Country Club Lane from Golden Circle Drive to Nutmeg Street is proposed as part of the Project. The SAP would provide a series of intersection improvements designed to calm traffic speeds and enhance pedestrian and bicycle circulation. Specifically, the SAP includes the provision of roundabouts at Golden Circle Drive, Firestone Drive, and La Brea Street. Traffic signals with pedestrian crosswalks are proposed at Gary Lane and Nutmeg Street. Narrowed lanes and buffered bike lanes are also proposed.

Under the reduced-density alternatives, there would be approximately 67% less traffic under the 138-unit alternative and 63% less traffic under the 158-unit alternative compared to the Project. These alternatives would result in two fewer street segment significant impacts, and two fewer intersection impacts; see Appendix 4-1. All other significant impacts would remain the same as the Project and the SAP traffic-calming measures would still be required. Therefore, under the reduced-density alternatives, traffic impacts would be reduced, because fewer homes would result in fewer trips and fewer vehicles on surrounding streets. In addition, the alternatives would not require the identified improvements on the I-15 southbound on-ramp at El Norte Parkway, which would eliminate an identified significant unavoidable impact associated with the Project. However, the Project mitigates this impact with the identified improvements and conservatively recommends adoption of a significant “unavoidable” impact, only because the proposed improvements are not within the City’s jurisdiction and control because the on-ramp is a Caltrans facility.

4.7.2.8 Project Objectives

Based on the previous description in Section 4.7.1, the two reduced-density alternatives (158 and 138 residential units) proposed by ECCHO during the EIR public scoping period would not include the following components that are included in the Project:

- Comprehensively planned and designed landscaped greenbelt, that would also provide a privacy buffer for all existing surrounding residents
- A 4-mile trail system to connect existing and new neighborhoods

- Recreation center with pool, gym, restaurant and bar
- Banquet space for community events and social gatherings
- Events lawn for summer concerts & movies in the park
- Professionally managed community farm with educational programming
- Multi-modal transportation improvements, such as pedestrian enhancements and protected Class II bike lanes along Country Club Lane
- Traffic calming program on Country Club Lane including roundabouts and new landscaping to reduce speed and improve roadway safety
- Installation of adaptive signal technology along El Norte Parkway
- Range of housing opportunities

Under the Project, a range of different lot sizes would be provided in order to accommodate a variety of housing opportunities. In addition to a range of different lot sizes, the Project would also include four- to six-unit clusters on common lots. The existing R-1-7 zoning would remain the same under the two reduced-density alternatives. Thus, these alternatives would have one large lot size (7,000 square feet) across the entire Project site, and would not provide a wide range of lot sizes, clustered lots, or a diverse range of housing opportunities within interrelated villages similar to the Project. In addition, although fewer units would be developed, the footprint of disturbance to construct the reduced number of residences would be the same as the Project because the lot sizes would be larger.

As illustrated and described in Table 4-2, Comparison of Alternatives Relative to Project Objectives, the reduced-density alternatives These alternatives would not meet Project objectives 3, 5, and 6 and would only partially achieve Project objectives 2, 4, 7, and 8.

4.8 Analysis of the Reduced-Density Alternative (279 Units)

4.8.1 Reduced-Density Alternative (279 Units) Description and Setting

This reduced-density alternative would include development of 279 residential units (Figure 4-2). This is 113 units less than the Project. This alternative would include three different sized lots: 5,000 square feet (94 DUs); 6,000 square feet (86 DUs); and 7,000 square feet (99 DUs). A zone change or a specific plan, similar to the Project, would be required because zone R-1-7 requires lot sizes to be a minimum of 7,000 square feet.

Under this alternative, there would be approximately 18 acres of open space/landscape, which is approximately 30 acres less than the Project. Although this alternative has fewer units than the Project, because the smallest lot would be 5,000 square feet, this alternative would have a larger

footprint of development as compared to the Project, which features clustered development with higher density on a smaller footprint in some areas. Because of the smaller area of open space (i.e., 30 acres less open space), this reduced-density alternative would not include the same opportunities for dedicated open space and the provision of greenbelts or a walking trail system as the Project. However, within the approximately 18 acres of open space/landscape a 1.5-mile trail system would be included. Lastly, although this alternative would not include the SAP, it would include bicycle and pedestrian improvements along Country Club Lane.

4.8.2 Comparison of the Effects of the Reduced-Density Alternative (279 Units) to the Project

4.8.2.1 Air Quality

The Project would have a significant impact associated with construction emissions exceeding the City's significance threshold for NO_x and with respect to sensitive receptors. The Project would also conflict with the RAQS and SIP, without mitigation, because although the Project's proposed density would be consistent with the underlying growth projections of the General Plan, the existing land use (golf course) was included in the current RAQS, which did not provide growth in residential units, population, or vehicle trips. Although redesignation of this land use represents minor adjustments to the Project site (update of the zoning density), this new density would represent new designations that were not previously considered in the RAQS and SIP. All potentially significant impacts would be reduced to less than significant with mitigation (**M-AQ-1** and **M-AQ-2**). Development would still occur under the reduced-density alternative, which would result in construction emissions similar to the Project; however, since fewer homes would be constructed under this alternative, less emissions would occur over a shorter duration. Additionally, although slightly less grading and earthwork would be required because these alternatives do not include the SAP, the same type of equipment would be used and the amount of area disturbed would be greater under this alternative because the lot sizes would be larger. Therefore, air quality impacts would be similar to the Project and would remain less than significant with mitigation. Similar to the Project, the reduced-density alternative (279 units) would have operational emissions that would not exceed the City's significance thresholds; therefore, it would result in a less than significant impact during operation. Also similar to the Project, the reduced-density alternative would result in an inconsistency with the RAQS and SIP without mitigation, because the existing land use (golf course) was included in the current RAQS. This impact would be reduced to less than significant with implementation of **M-AQ-1**.

4.8.2.2 Biological Resources

The Project would result in potentially significant impacts to biological resources associated with the loss of protected trees, mature trees, riparian habitat, wetlands, and nesting birds. With

implementation of mitigation measures, impacts would be reduced to less-than-significant levels. Development would still occur under the reduced-density alternative (279 units) and impacts to biological resources would be the same compared to the Project. Impacts to biological resources would not be reduced or avoided under this alternative.

4.8.2.3 Cultural Resources

Impacts to cultural resources would be less than significant with implementation of mitigation measures under the Project. Under the reduced-density alternative (279 units), development of the site with single-family homes would still occur and the potential to uncover cultural resources or human remains still exists. Therefore, impacts would be the same compared to the Project. Impacts to cultural resources would not be reduced or avoided under this alternative.

4.8.2.4 Greenhouse Gas Emissions

Similar to air quality impacts, the GHG emission impacts of the reduced-density alternative would be less than those of the Project during construction and operation. Compared to the Project, the reduced-density alternative would involve fewer units, and operational traffic trips would be reduced by 35% compared to the Project. Additionally, although slightly less grading and earthwork would be required because these alternatives do not include the SAP, the same type of construction equipment would be used and the amount of area disturbed would be greater under this alternative because the lot sizes would be larger. The reduced-density alternative (279 units) would not include the Village Center and the integrated walking and bicycling trail that would connect the villages with the Village Center and adjacent community and improve the overall pedestrian network, which accounts for additional GHG emissions reductions. Although the reduced-density alternative would generate less GHG emissions, it would still increase GHG emissions relative to existing conditions, so the impact determination would remain potentially significant. However, with mitigation (**M-GHG-1**) the GHG emissions impact would be less than significant.

4.8.2.5 Hazards and Hazardous Materials

The Project would result in potentially significant impacts associated with hazards and hazardous materials. Two former USTs are located in the Project vicinity, as well as two floor drains and two clarifiers that would be potentially significant. In addition, the historic agricultural use of the property and the potential presence of asbestos-containing materials and lead based paint in the existing buildings represent a potentially significant impact. However, with implementation of mitigation measures, all impacts would be reduced to less than significant. The potentially hazardous conditions that were identified as part of the Project would still be present under the reduced-density alternative (279 units). Development under this alternative would still be

required to implement all mitigation measures to reduce potential impacts. Impacts to hazards and hazardous materials would not be reduced or avoided under this alternative but would be the same as the Project.

4.8.2.6 Noise

The Project identified potentially significant traffic and construction noise level impacts. With implementation of mitigation measures all impacts related to increased noise levels would be reduced to less than significant under the Project. It should be noted that even with no Project trips added, on-site exterior traffic noise levels experienced under the worst-case scenario (Year 2035 + Project) would remain significant. Off-site traffic noise levels would be less than significant.

Development would still occur under the reduced-density alternative (279 units). Construction noise levels would be slightly less; however mitigation would still be required to reduce impacts to less than significant. Operational traffic trips would be reduced by 35% compared to the Project. However, as previously stated, even if no Project trips were added, on-site exterior traffic noise levels experienced under the worst-case scenario (Year 2035 + Project) would still be significant; therefore, a trip reduction of 35% would not affect overall future noise exposure levels, or eliminate any of the required mitigation measures. For off-site traffic noise level impacts, the Project concluded that impacts would be less than significant and not cumulatively considerable; therefore, a trip reduction of 35% under this alternative would also result in a less than significant and not cumulatively considerable impact. Impacts would be the same as the Project and mitigation would still be required.

4.8.2.7 Transportation and Traffic

The Project would result in potentially significant impacts to two intersections, one street segment and one ramp meter under the Existing Plus Project scenario; one intersection and one street segment under the Existing Plus Cumulative Projects Plus Project scenario; and five intersections, one street segment, and one ramp meter under the Year 2035 Plus Project scenario. With implementation of mitigation measures, all impacts would be reduced to less than significant with the exception of one impact to a Caltrans facility (i.e., southbound on-ramp at El Norte Parkway), which would be mitigated with identified improvements, but the impact would remain conservatively significant and unavoidable because the improvement is to a Caltrans facility to which the City has no jurisdiction or control; and, thus, cannot guarantee implementation.

An SAP for Country Club Lane from Golden Circle Drive to Nutmeg Street is proposed as part of the Project. The SAP would provide a series of intersection improvements designed to calm traffic speeds and enhance pedestrian and bicycle circulation. Specifically, the SAP includes the provision of roundabouts at Golden Circle Drive, Firestone Drive, and La Brea Street. Traffic signals with

pedestrian crosswalks are proposed at Gary Lane and Nutmeg Street. Narrowed lanes and buffered bike lanes are also proposed.

Under the reduced-density alternative (279 Units), there would be approximately 35% less traffic compared to the Project. This alternative would result in one less street segment significant impact, one less intersection impact, and one intersection impact would be delayed from “direct” to “near-term and long-term cumulative” only. All other significant impacts would remain the same as the Project (Appendix 4-2). Therefore, although impacts would be reduced compared to the Project, they would not be avoided.

4.8.2.8 Project Objectives

Based on the previous description in Section 4.8.1, the Reduced-Density Alternative (279 units) would not include the following components that are included in the Project:

- A 4-mile trail system to connect existing and new neighborhoods
- Recreation center with pool, gym, restaurant and bar
- Banquet space for community events and social gatherings
- Events lawn for summer concerts & movies in the park
- Professionally managed community farm with educational programming
- Multi-modal transportation improvements, such as pedestrian enhancements and protected Class II bike lanes along Country Club Lane
- Traffic calming program on Country Club Lane including roundabouts and new landscaping to reduce speed and improve roadway safety
- Installation of adaptive signal technology along El Norte Parkway

Under the Project, a wide range of different lot sizes would be provided in order to accommodate a variety of housing opportunities. In addition to a range of different lot sizes, the Project would also include four- to six-unit clusters on common lots. This alternative would not offer a diverse range of housing as compared to the Project. These planning and housing considerations are not only important Project objectives but they are important goals and policies of the City’s General Plan; see Section 4.7.2.8 for more details regarding the consideration and important of a diverse range of housing.

As illustrated and described in Table 4-2, Comparison of Alternatives Relative to Project Objectives, the reduced-density alternative would not meet Project objectives 3, 5, and 6 and would only partially achieve Project objectives 4, 7, and 8.

4.9 Determination of Environmentally Superior Alternative

4.9.1 Environmentally Superior Alternative

As shown in Table 4-1, Environmentally Superior Alternative, implementation of the No Project/No Development Alternative would result in the greatest reduction in significant impacts when compared to the Project. Because the No Project/No Development Alternative would result in the least amount of impacts to the environment, it would be the environmentally superior alternative. However, Section 15126.6(e)(2) of the CEQA Guidelines 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.

Aside from the No Project/No Development Alternative, the 138-unit reduced-density alternative would result in the least amount of environmental impacts. As compared to the Project, impacts associated with air quality, noise, and transportation and traffic would be reduced. This alternative would eliminate an identified significant unavoidable traffic impact associated with the Project at the Interstate 15 (I-15) southbound on-ramp at El Norte Parkway. Therefore, this alternative is identified as the Environmentally Superior Alternative. However, the Project mitigates this traffic impact with the identified improvements and conservatively concludes a significant “unavoidable” impact, only because the proposed improvements are not within the City’s jurisdiction and control as the on-ramp is a Caltrans’ facility.

4.9.2 Comparison of Environmentally Superior Alternative to Project

The Project’s varying lot sizes and clustered lots within interrelated neighborhoods create the opportunity for a variety of housing opportunities in contrast to what is allowed under the City’s R-1-7 zoning, which would be applicable to the two reduced-density alternatives (158 and 138 residential units). These planning and housing considerations are not only important Project objectives but they are important goals and policies of the City’s General Plan.

California state law requires each city and county to adopt a general plan for its physical development. The attainment of decent and suitable living is also identified by state law as a major housing goal. Recognizing the important role of local planning and housing programs in the pursuit of this goal, the Legislature has mandated that all cities and counties prepare a housing element as part of their general plan, which enables cities and counties to develop different goals and policies to develop, maintain, and preserve housing. The intent of the overall housing element requirement is to promote a mix of unit types, tenure, and affordability in all cities and counties.

In addition, the City takes its commitment to regional housing needs seriously. One of the City’s housing goals and policies is to accommodate its regional share of housing for all income groups

(Housing Policy 2.1). Other policies in the Housing Element seek to expand the housing stock, encourage creative residential developments, etc. In comparing the Project's housing to that in the two reduced-density alternatives, the Project better accomplishes the intent of these housing policies by providing a varied mix of housing lots sizes and opportunities and thereby allow a wider range of income groups to be able to afford housing in the City. The reduced-density alternatives would not provide a mixture of land uses in close proximity or provide differing home sizes or a variety of housing opportunities. As an illustration, the City's 2016 Regional Housing Needs Assessment (RHNA) targets show that only 20 percent of above moderate income residential units have been issued building permits.² Over the course of the current Housing Element Planning cycle (2013–2020), the City has not been able to produce the amount of housing that is needed for all types of income levels, including lower-income households, moderate-income households, and above-moderate-income households. As described and analyzed in Section 3.1.6, Population and Housing, in 2010, the City had a total population of 143,976 with 47,979 total housing units, and there was a housing vacancy rate of 5.1% (SANDAG 2015). As of 2016, the estimated population in the City was 150,760 people with 48,561 total housing units, and there was a housing vacancy rate of 4.4% (SANDAG 2017). Since 2010, the Escondido population has increased by approximately 6,784 residents and the total housing units has increased by approximately 582 units, meanwhile the amount of vacant housing has declined. By 2020, it was estimated that the total population in the City would be approximately 165,214 residents, which indicates over 18,000 new residents would be introduced to the area. Additionally, by 2050, it is anticipated that the City's population would be over 173,500 residents (SANDAG 2013).

The target for moderate income residential also is considerably below the City's target. The two reduced-density alternatives would each reduce the total number of homes when compared to the Project. From a land planning standpoint, this is not a desirable outcome or yield that is permitted by the land use designation of the General Plan. Further if the reduced-density alternatives were implemented, they would frustrate important CEQA policies found in Public Resources Code Section 21159.26. This CEQA provision provides that a public agency may not reduce the proposed number of housing units as a project alternative for a particular significant effect on the environment if it determines there is another feasible project alternative that would provide a comparable level of mitigation. The Project has reduced several of its significant impacts. On balance, the solution does not appear to be to reduce the housing densities as some form of added mitigation without a corresponding reduction in identified significant impacts.

² See the City's Annual Element Progress Report, Housing Element Implementation, Table B, for the reporting period of January 1, 2016, through December 31, 2016.

This is especially the case when, locally, the City's Housing Element acknowledges the need to increase, not decrease, its housing stock. As an illustration, the Housing Element, page IV-46 (Figure IV-26), shows that between 2000 and 2010, Escondido's housing stock increased at less than 7%, below the countywide average and significantly below nearby Carlsbad and San Marcos, where housing growth exceeded 32% and 52%, respectively. In addition, the City's projected housing stock must increase by 10% by 2030 (see City Housing Element, Fig. IV-27). These projected increases in the housing stock likely will be not realized if projects like this one have housing densities reduced. The Project, if approved, would provide a better mix of housing for income groups and thereby assist the City in accommodating its regional share of housing for income groups when compared to the two reduced-density alternatives.

Additionally, as stated in Section 4.8.2.8 and Table 1-2, Comparison of Alternatives Relative to the Project Objectives, the Environmentally Superior Alternative would not meet Project objectives 1, 2, 4, 5 and 9, and would only partially achieve Project objectives 3 and 7.

Table 4-1
Environmentally Superior Alternative

Issue Areas with Potentially Significant Impacts	Project	Alternatives Considered		
		1	2	3
		No Project/No Development	Reduced-Density Alternatives (156 and 138 Units)	Reduced-Density Alternative (279 Units)
Air Quality	LTS	▼	▼	▼
Biological Resources	LTS	▼	—	—
Cultural Resources	LTS	▼	—	—
Noise	LTS	▼	▼	▼
Hazards and Hazardous Materials	LTS	▼	—	—
Transportation and Traffic	SU	▼	▼	▼

▲ Alternative is likely to result in greater impacts to issue when compared to Project.

— Alternative is likely to result in similar impacts to issue when compared to Project.

▼ Alternative is likely to result in reduced impacts to issue when compared to Project.

NS Not a potentially significant impact

LTS Less than Significant with mitigation measures

SU Potentially significant and unavoidable impact

**Table 4-2
Comparison of Alternatives Relative to Project Objectives**

Objectives	No Project/No Development Alternative	Two Reduced-Density Alternatives (158/138 Units)	Reduced-Density Alternative (279 Units)
1. Eliminate the blighted condition of the current Project site and abate hazards to public health and safety.	NO: The Project site would remain in its current blighted condition.	YES: Redevelopment of the site would still occur under this alternative.	YES: Redevelopment of the site would still occur under this alternative.
2. Assist the City in implementing the General Plan's housing goals by increasing the City's housing stock and diversifying the range of housing opportunities.	NO: The Project site would remain in its current condition; therefore, no housing would be built.	PARTIAL: This alternative would increase housing stock; however all residential lots would be a minimum of 7,000 sf in size, therefore, a range of housing types and densities would not be provided.	YES: Residential lots would range in size from 5,000 square feet to 7,000 square feet.
3. Provide a variety of housing types and designs within interrelated villages located adjacent to an existing, established residential community.	NO: The Project site would remain in its current condition and no housing would be provided.	NO: These alternatives would have one large lot size (7,000 square feet) across the entire Project site, and would not provide a wide range of lot sizes, clustered lots, or a diverse range of housing opportunities within interrelated villages similar to the Project.	NO: This alternative would only have three lot sizes across the entire Project site, and would not provide a wide range of lot sizes, clustered lots, or a diverse range of housing opportunities within interrelated villages similar to the Project.
4. Create an interrelated open space system including a greenbelt with walking trails, pocket parks, and landscape areas, in addition to active recreation facilities, to facilitate an active and healthy lifestyle for residents, thereby assisting the City in implementing the General Plan's community health and services goals.	NO: The Project site would remain in its current condition; therefore, no open space system would be implemented.	PARTIAL: While some passive open space would be provided, it would not include active recreational facilities.	PARTIAL: While some passive open space would be provided, it would not include active recreational facilities.
5. Provide a place for the community to gather, socialize, dine, and recreate thereby assisting the City in implementing the General Plan's community health and services goals.	NO: The Project site would remain in its current condition; therefore, no community facilities and recreational facilities would be provided.	NO: These alternatives do not include a trail, recreation center, event law, community farm, restaurant, or banquet space.	NO: This alternative does not include a trail, recreation center, event law, community farm, restaurant, or banquet space.

**Table 4-2
Comparison of Alternatives Relative to Project Objectives**

Objectives	No Project/No Development Alternative	Two Reduced-Density Alternatives (158/138 Units)	Reduced-Density Alternative (279 Units)
6. Provide a Specific Alignment Plan as part of the Project that would provide a series of intersection improvements designed to calm traffic speeds and enhance pedestrian and bicycle circulation.	NO: This alternative would not include a SAP.	NO: This alternative would not include a SAP.	NO: This alternative would not include a SAP
7. Protect privacy of existing residents by providing a landscaped buffer between all new and existing homes.	NO: The Project site would remain in its current condition; therefore, no landscape buffer would be provided.	PARTIAL: Some passive open space would be provided, but the landscaping including trees and shrubs would not be to the level provided by the Project.	PARTIAL: Some passive open space would be provided, but the landscaping including trees and shrubs would not be to the level provided by the Project.
8. Implement sustainable design measures to enhance walkability, minimize water usage for both interior and exterior facilities, and maximize energy-saving features; and cluster residential within distinct single-family villages or neighborhoods to maintain site topography, protect natural resources, and avoid hazards consistent with the City's land use goals.	NO: The Project site would remain in its current condition; therefore no development would occur and no sustainable design measures would be implemented.	PARTIAL: Sustainable design measures would be included as part of these alternatives but not to the level provided by the Project. These alternatives would not cluster residential in villages or neighborhoods although they would maintain site topography and protect natural resources.	PARTIAL: Sustainable design measures would be included as part of this alternative but not to the level provided by the Project. This alternative would cluster residential in villages or neighborhoods and it would maintain site topography and protect natural resources.
9. Implement timely public facilities within existing service areas without burden or cost to existing residents, visitors, or North County incorporated and unincorporated communities.	NO: The Project site would remain in its current condition and no public facilities would be needed or provided.	YES: Public facilities would be implemented in a timely manner without burden or cost to existing residences.	YES: Public facilities would be implemented in a timely manner without burden or cost to existing residences.
Conclusion	This alternative would not meet any of the project objectives.	These alternatives would not meet Project objectives 3, 5, and 6 and would only partially achieve Project objectives 2, 4, 7, and 8.	This alternative would not meet Project objectives 3, 5, and 6 and would only partially achieve Project objectives 4, 7, and 8.

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