6.0 ALTERNATIVES

6.1 INTRODUCTION

The California Environmental Quality Act (CEQA) Guidelines state that an "EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives" (Section 15126.6). The *State CEQA Guidelines* state that "the range of alternatives required in an EIR is governed by a 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 (Section 15126.6).

In defining feasibility of alternatives, the CEQA Guidelines state that "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" (Section 15126.6).

6.2 PROJECT OBJECTIVES

The applicant's objectives for the project are described in Section 2.0, *Project Description*, and restated below.

- 1. Provide infill growth for the City that is anticipated and desired by City planning decisions and guidelines;
- 2. Preserve agricultural land and open space on site, maintain agricultural views from U.S. 101;
- 3. Create significant entry-level, workforce housing opportunities within the City that is specifically "affordable by design;"
- 4. Implement a walkable-bikeable neighborhood design that is integrated with public transit access and open space amenities that encourage alternative modes of transportation;
- 5. Create new commercial, office and hotel opportunities that will accommodate and complement existing businesses in downtown San Luis Obispo;
- 6. Develop an Agriculture Heritage Facilities & Learning Center offering seasonal attractions and local goods that promote the region's agricultural richness;
- 7. Establish an important link in the Bob Jones Regional Trail;
- 8. Provide fair-share financial contribution towards important public circulation improvements.

6.3 SIGNIFICANT AND UNAVOIDABLE IMPACTS OF THE PROJECT

The project would result in significant and unavoidable impacts to air quality, cultural resources, greenhouse gas (GHG) emissions, noise, and transportation/circulation.

Air Quality

Buildout of the San Luis Ranch Specific Plan Area would increase the City's total population in 2035 by 2.6 percent over the current population. The project's increase in total vehicle miles traveled (VMT) is projected to be 3.0 percent. The projected increase in VMT would exceed the project's increase to population; therefore, the project would be inconsistent with the SLOAPCD's Clean Air Plan assumptions for VMT growth. Implementation of Mitigation Measures AQ-1, AQ-3(a), and AQ-3(b) would reduce regional air pollutant emissions and ensure that the project would be consistent with the CAP transportation control measures and land use strategies. However, mitigation is not available that would reduce projected VMT such that the project's vehicle trip rate increase would not exceed population growth in the region. Therefore, impacts related to consistency with the 2001 CAP would remain significant and unavoidable.

Cultural Resources

The relocation and adaptive reuse of the main residence and former spectators' barn/viewing stand, and the demolition or off-site relocation of the remaining buildings and structures on the ranch, including the main barn, would result in adverse changes to individually identified historic structures (the main barn and main residence) as well as the historic context of the San Luis Ranch Complex, which is collectively identified as historically significant. Additionally, demolition of the historic main barn would conflict with General Plan Conservation and Open Space Element Policies 3.3.1 and 3.3.2. Implementation of Mitigation Measures CR-1(a) through CR-1(c) would reduce impacts to historic resources to the maximum extent feasible. However, impacts to historic resources on the project site would remain significant and unavoidable, even after mitigation.

Land Use/Policy Consistency

The Specific Plan is potentially inconsistent with General Plan Land Use Element Policy 1.10.4 (Design Standards), Circulation Element Policy 6.1.2 (Multimodal Level of Service Objectives), Conservation and Open Space Element Policy 3.3.2 (Demolitions), and Conservation and Open Space Element Policy 3.3.3 (Historical Documentation). Mitigation Measures AES-1(a), AES-1(b), AG-1, AG-3, BIO-1(a) through BIO-1(h), BIO-2(a) through BIO-2(c), CR-1(a) through CR-1(c), GEO-1, GEO-3, HAZ-4, HAZ-5(a), HAZ-5(b), HAZ-6, N-1(a) through N-1(g), N-4(a), N-4(b), N-5(a) through N-5(d), T-1(a) through T-1(h), T-2(a) through T-2(j), T-3(a) through T-3(d), T-4, T-5, T-6, T-7, T-8(a) through T-8(g), T-9(a) through T-9(l), T-10(a) through T-10(c), would ensure that several potential conflicts between the City of San Luis Obispo General Plan and the San Luis Ranch Specific Plan would be reduced to the maximum extent feasible. Despite implementation of these mitigation measures, the Specific Plan would remain potentially inconsistent with these General Plan policies. Therefore, this impact would remain significant and unavoidable.

Noise

Construction of the project would occur in six phases between 2017 and 2023. The highest noise level that nearby residences would be exposed to during construction activity would be 85 dBA during grading. This would exceed the single-family threshold of 60 dBA for relatively long-term construction activity. Additionally, trucks hauling material to and from the site could result in noise levels that exceed the 75 dBA threshold for intermittent noise. Mitigation Measures N-1(a) through N-1(g) would reduce noise associated with on- and off-site construction activity to the maximum extent feasible. However, mitigation would not reduce the noise associated with temporary construction activities below the applicable City standards for relatively long term construction activity or intermittent noise. Although this impact would be temporary, it would remain significant and unavoidable.

Transportation and Traffic

Under Existing Plus Project, Near-Term Plus Project conditions and Cumulative Plus Project conditions, several study area intersections would operate at unacceptable automobile, bicycle, pedestrian, and transit multimodal levels of service (MMLOS) during AM and PM peak hours based on the City's adopted MMLOS standards. In addition, the volume of traffic at several intersections would exceed lane capacities during AM and PM peak hours. In addition, under Cumulative Plus Project conditions, five study area segment groups, as well as mainline segments of U.S. 101 northbound and southbound at Los Osos Valley Road and Madonna Road, would operate at unacceptable automobile, bicycle, pedestrian, and transit MMLOS during AM and PM peak hours Therefore, under Existing Plus Project, Near-Term Plus Project, and Cumulative Plus Project conditions, the project would conflict with the City's established measures of effectiveness for the performance of the circulation system and LOS standards and vehicle queueing standard. Implementation of the mitigation measures described in Section 4.12, Transportation and Circulation, would improve LOS and reduce impacts to lane capacities at most impacted intersections to acceptable levels. However, potential right-of-way constraints at the Madonna Road & Dalidio Drive and Los Osos Valley Road & Froom Ranch Way intersections limit the feasibility of required mitigation, and result in significant and unavoidable transportation impacts at these impacted intersections. In addition, mitigation would not be effective in reducing potential impacts identified for the northbound and southbound lanes of the mainline segments of U.S. 101 at Los Osos Valley Road and Madonna Road under Cumulative Plus Project conditions to a less than significant level. Therefore, potential impacts identified for Existing Plus Project, Near-Term Plus Project, and Cumulative Plus Project conditions may not be feasibly mitigated to a less than significant level. As a result, impacts associated with transportation and circulation would remain significant and unavoidable.

6.4 ALTERNATIVES ANALYSIS

The range of alternatives required in an EIR is governed by a "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 impacts 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 (CEQA Guidelines Section 15126.6[f]).

This discussion focuses on alternatives to the project, including alternatives which were considered and rejected. These alternatives have been selected for their ability to comply with the City's General Plan and substantially reduce or eliminate the one or more of the adverse impacts associated with the Specific Plan, while still meeting basic project objectives. The EIR also includes two versions of a No Project Alternative. Consistent with the CEQA Guidelines (§15126.6[e]), the "no project" analysis will discuss the existing conditions, as well as what would be reasonably expected to occur in the foreseeable future if the project is not approved, based on current plans and consistency with available infrastructure and community services. This analysis includes only on-site alternatives, on the basis that off-site alternatives are not available that would attain the basic objectives of the project, and because the site was specifically identified in the Land Use Element Update as a Specific Plan area. The alternatives considered are as follows:

- Alternative 1: No Project, No Development
- Alternative 2: No Project, Measure J Entitlements
- Alternative 3: Historical Resource Preservation
- Alternative 4: 50% On-Site Agriculture/Open Space

As required by CEQA, this section also includes a discussion of the "environmentally superior alternative" among those studied.

6.4.1 Alternatives Considered but Rejected

As discussed above, CEQA Section 15126.6(c) requires that an EIR disclose alternatives that were considered and rejected and provide a brief explanation as to why such alternatives were not fully considered in the EIR. In particular, as required by the *State CEQA Guidelines*, the selection of alternatives included a screening process to determine a reasonable range of alternatives, which could reduce significant effects but also feasibly meet project objectives. Alternatives that do not clearly provide any environmental advantages compared to the project, meet basic project objectives, or achieve overall lead agency policy goals, have been eliminated from further consideration. For the San Luis Ranch Project, characteristics used to reject alternatives from further consideration include:

- *Failure to meet basic project objectives;*
- Limited effectiveness in reducing project environmental impacts;
- Inconsistency with City policies, including the General Plan;
- Potential for inconsistency with adopted agency plans and policies; and
- Reasonableness of the alternative when compared to other alternatives under consideration.

The following alternatives were considered but eliminated from further analysis by the City due to one or more of these factors.

Project with Overpass Only

Under this alternative, the site would be developed with residential, commercial, hotel and open space uses as planned under the current proposal. However, the transportation mitigation for this alternative would only require development of the Prado Road overpass connection at U.S. 101, but would not include reconstruction of the northbound ramps, or the eventual

development of the southbound ramps currently required by mitigation measures described in Section 4.12, *Transportation and Circulation*, and assumed in the City's General Plan.

However, this alternative would be inconsistent with the General Plan Circulation Element, which assumes future development of an overpass or full-access interchange at Prado Road and U.S 101, based on the anticipated traffic demand that would result from future development. In addition, this alternative would not implement mitigation identified in this EIR as necessary to reduce existing, near-term, and cumulative transportation impacts, resulting in additional significant and unavoidable impacts. Therefore, this option was considered and rejected, consistent with *State CEQA Guidelines* Section 15126.6(c).

Reduced Project, Vehicle Trip-Reducing

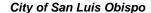
Under this alternative, the total square footage of office and retail uses and the number of residential units would be reduced to avoid the significant and unavoidable transportation impacts at the Madonna Road & Dalidio Drive and Los Osos Valley Road & Froom Ranch Way intersections. The specific reduction in planned development required to meet this criterion would be determined based on the project-specific traffic analysis.

However, as shown in Section 4.12, *Transportation and Circulation*, the need for mitigation at these intersections (Mitigation Measures T-1[b] and T-1[d]) would be triggered under phase 1 of the project. As shown in Figure 2-14 in Section 2.0, Project Description, phase 1 of the proposed development includes approximately 200 low-medium density residential units, which is less than half of the residential development anticipated for the site under the General Plan, and does not include any of the commercial development anticipated for the site under the General Plan. Therefore, the reduction in residential and commercial uses on the project site necessary to achieve this alternative was found to be inconsistent with the General Plan Land Use Element designations for the Specific Plan Area, which assumes development of a project with 350 to 500 residential units; 50,000 to 200,000 square feet of commercial development; 50,000 to 150,000 square feet of office development; a 200-room hotel; 5.8 acres of parks; and 66 acres of agriculture and open space. In addition, this alternative would not achieve the basic project objectives to provide infill growth for the City; create workforce housing opportunities; and create new commercial, office, and hotel opportunities. As a result, this option was considered and rejected, consistent with *State CEQA Guidelines* Section 15126.6(c).

Reduced Project, Airport Land Use Plan Consistent

Under this alternative, the density of residential and non-residential development on the project site would be reduced to be consistent with the noise contours and safety zones in the adopted San Luis Obispo County Regional Airport Land Use Plan (ALUP).

As described in Section 4.9, Land Use/Policy Consistency, while the project would conflict with the ALUP, it is consistent with recommended safety zones of the California Airport Land Use Planning Handbook (CALUPH) which were evaluated in the 2014 Airport Land Use Compatibility Report prepared by Johnson Aviation (refer to Appendix I) in support of the City's recent Land Use and Circulation Element Update process and the LUCE Update EIR. The City Council found during its review of airport compatibility for the LUCE Update that the 2014 Airport Land Use Compatibility Report and revised LUCE Update EIR provided substantial evidence in the record that development under the Land Use and Circulation Element Update project would be consistent with safety and noise standards set forth in the Caltrans Handbook



and supporting federal guidance, and that maps provided in the ALUP do not reflect guidance of safety zones and land use restrictions as recommended by the CALUPH (Council Agenda Report, City of San Luis Obispo 2014d). Therefore, even though the project would be inconsistent with the ALUP, it would be consistent with safety zones and land use restrictions as recommended by the CALUPH and as evaluated in the Johnson Aviation Compatibility Report (Appendix I).

In addition, this alternative would be inconsistent with the General Plan Land Use Element designations for the Specific Plan Area, which assumes development of a project with 350 to 500 residential units; 50,000 to 200,000 square feet of commercial development; 50,000 to 150,000 square feet of office development; a 200-room hotel; 5.8 acres of parks; and 66 acres of agriculture and open space. Because of the limited development that would be possible on the project site based on the adopted ALUP (refer to Section 4.9, *Land Use/Policy Consistency*, for a detailed discussion of the allowable densities under the ALUP Safety Areas on the project site), this alternative would not achieve the basic project objectives to provide infill growth for the City; create workforce housing opportunities; create new commercial, office, and hotel opportunities; and implement a walkable-bikeable neighborhood design. Therefore, this option was considered and rejected, consistent with *State CEQA Guidelines* Section 15126.6(c).

6.4.2 Alternative 1: No Project, No Development

Description

This alternative assumes that the San Luis Ranch Specific Plan is not adopted, that none of the proposed entitlements are implemented, including annexation to the City, and that no further development would occur on the project site. The project site would continue to support existing agricultural land uses, and the existing structures on the site would remain.

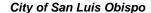
Impact Analysis

As proposed, the San Luis Ranch Specific Plan would have significant and unavoidable impacts related to air quality, cultural resources, GHG emissions, land use/policy consistency, noise, and transportation and circulation. Since this alternative assumes that the project site would remain under agricultural use, and that no new development would occur on the site, this alternative would avoid all of the significant and unavoidable impacts identified for the project. In addition, this alternative would not result in any of the potentially significant impacts identified for the project, and therefore would not trigger the need for any of the mitigation measures identified in this EIR. However, this alternative would fail to meet the goals of the City's General Plan as they apply to the San Luis Ranch Specific Plan area, which describe the Specific Plan Area as a planned buildout area within the City, and would fail to meet the project objectives. Overall, Alternative 1 would result in reduced physical environmental impacts when compared to the project, but would not achieve the planning goals included in the City's General Plan.

6.4.2 Alternative 2: No Project, Measure J Entitlements

Description

This alternative assumes that the San Luis Ranch Specific Plan is not adopted and that none of the proposed entitlements are implemented, including annexation to the City. Therefore, this alternative represents a project that would be processed by San Luis Obispo County, and



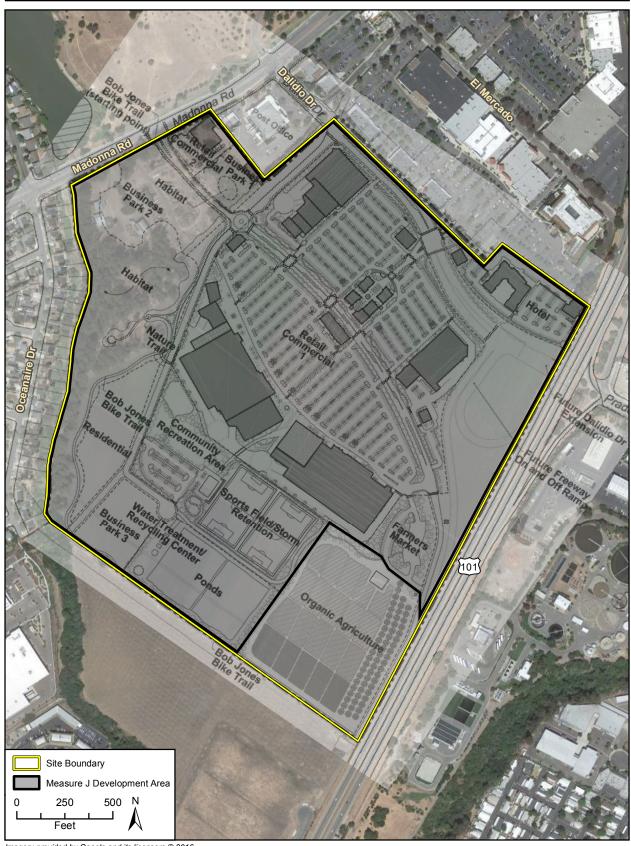
considers what would be reasonably expected to occur in the foreseeable future based on current plans and consistency with available infrastructure and community services. There are existing entitlements on the project site for development in the County from the voter-approved initiative known as "Measure J," which was passed in 2006 and upheld in 2009. The Measure J entitlements include 60 multi-family dwelling units, 560,000 square feet of regional commercial and outdoor sales areas, 198,000 square feet of office space, and a 150-room hotel and ancillary facilities. Because the Measure J entitlements would leave the project site under the jurisdiction of the County, but surrounded entirely by the City limit, these entitlements would also require the use of private water from onsite wells and an onsite wastewater treatment facility. Figure 6-1 depicts the Measure J site plan and approximate development area of this alternative.

Impact Analysis

Since this alternative (Alternative 2) assumes that the project site would be developed under the existing County Measure J entitlement, this alternative would not require environmental review under CEQA. In addition, although this alternative may result in similar or greater environmental impacts in comparison to the proposed project, it would not require implementation of any of the mitigation measures identified in this EIR.

Agricultural Resources. Alternative 2 would retain a maximum of 13.3 acres of agricultural area on the project site, which would result in approximately 10 percent of the net site acreage being preserved in agricultural use. Since Alternative 2 would be developed under the County's jurisdiction, it would not achieve (nor would it be required to achieve) any of the City's agricultural planning goals and standards for the Specific Plan Area. Specifically, Alternative 2 would conflict with the City's General Plan Land Use Element Policy 8.1.4.f, which anticipates that future development on the San Luis Ranch property would dedicate one half of the total land or easements for agricultural or open space use, and that land dedicated to agriculture would be of size, location and configuration appropriate to maintain a viable, working agricultural operation. Therefore, with respect to consistency with City General Plan policies intended to protect agricultural land in the City, Alternative 2 would have an increased impact in comparison to the project. Furthermore, other potential impacts to agricultural resources under Alternative 2, including impacts associated with the conversion of Prime agricultural land and conflicts with nearby uses would be greater than the proposed project since this alternative would convert approximately 37 more acres of Prime agricultural land to non-agricultural use, in comparison to the project. Overall, impacts to agricultural resources would be greater under Alternative 2 in comparison to the project.

Air Quality. Alternative 2 would result in development of 60 multi-family dwelling units, 560,000 square feet of regional commercial and outdoor sales areas, 198,000 square feet of office space, and a 150-room hotel and ancillary facilities on approximately 115 acres of the project site. Total development under this alternative would result in an approximate 30% increase in VMT as well as an increase in associated air quality emissions (refer to *Transportation* discussion below). The rate of increased VMT associated with Alternative 2 would be expected to exceed the anticipated rate of increase in regional population, similar to the project. Therefore, Alternative 2 would not avoid the significant and unavoidable air quality impact identified in this EIR for the project as proposed. Overall, impacts to regional air quality would be greater than those associated with the project.



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Additional data provided by San Luis Ranch Specific Plan.

No Project, Measure J Entitlements Alternative Site Plan and Development Area

Figure 6-1

In addition, Alternative 2 includes development of an on-site wastewater treatment plant. This use could result in objectionable odors at uses on and adjacent to the project site. As such, Alternative 2 may result in greater impacts associated with new sources of objectionable odors on the site in comparison to the project.

Greenhouse Gas Emissions. Residential and commercial development under Alternative 2 would result in an approximate 30% increase in VMT in the City (refer to *Transportation* discussion below), as well as an increase in associated GHG emissions. As a result, impacts associated with GHG emissions would be greater than those associated with the project.

Land Use/ Policy Consistency. Because Alternative 2 would be processed by San Luis Obispo County, rather than the City, this alternative would not be required to be consistent with the City's General Plan, which anticipates that the project site would be annexed to the City and developed consistent with the general requirements described in Land Use Element Policy 8.1.4 (SP-2, San Luis Ranch [Dalidio] Specific Plan Area). For this reason, this alternative would make it impossible for the City to achieve the goals established for this area in the General Plan, as well as overall General Plan goals related to housing, agricultural protection, minimizing impacts to creeks, and circulation. For this reason, Alternative 2 would result in greater impacts resulting from City General Plan policy inconsistency issues when compared to the project.

Transportation. Based on similar trip rates to the project, but a different overall balance of land uses (less residential, more commercial and office), total development under Alternative 2 would result in an approximate 30% increase in vehicle trips and VMT. Similar to the project, vehicle trips generated by Alternative 2 would be expected to exceed the capacity and LOS thresholds for area intersections and roadways. The Measure J entitlements include space on the project site delineated specifically for a future extension of Dalidio Drive across U.S. 101 to Prado Road, as well as future freeway on- and off-ramps. However, the Measure J entitlements do not include construction of these improvements, which, similar to the project, are anticipated to be required to accommodate future traffic from development on the project site. In addition, the Measure J entitlements do not include mitigation for construction of other off-site roadway or intersection improvements to maintain acceptable level of service. Therefore, Alternative 2 would not avoid the significant and unavoidable transportation impacts identified in this EIR for the project. Overall, impacts to transportation and circulation under Alternative 2 would be greater in comparison to the project, because this alternative does not include roadway infrastructure improvements anticipated to be required to accommodate the traffic that would result from future development of the project site.

Other Environmental Topics.

Aesthetics. Alternative 2 would retain a maximum of 13.3 acres of agricultural land along U.S. 101. However, Alternative 2 would involve commercial and residential development that would alter existing foreground views from U.S. 101 to a more developed condition. Potential impacts to visual scenic resources would be increased in comparison to the project since there would be more development and substantially less agricultural land along the U.S. 101 corridor and within sight from surrounding scenic roadways. Unlike the proposed project, development under Alternative 2 would not be subject to review by the City's Architectural

Review Committee to ensure compliance with the City's applicable design guidelines. As a result, aesthetic impacts would be greater in comparison to the project.

<u>Biological Resources</u>. Alternative 2 would retain some of the natural habitat areas on the site, such as the existing eucalyptus grove on the northwestern portion of the site along Madonna Road, and the riparian corridor along Prefumo Creek. However, because the extent of residential and commercial development would be similar or slightly greater on other portions of the project site, potential impacts to biological resources would remain potentially significant, similar to the project. However, this alternative would not be required to undergo environmental review pursuant to CEQA and, therefore, would not be required to incorporate mitigation to avoid or minimize potential effects to biological resources. As such, the potential adverse effects of impacts to biological resources would be greater in comparison to the project.

<u>Cultural Resources</u>. As shown in Figure 6-1, Alternative 2 would increase the overall development footprint on the project site. This alternative would result in removal of the San Luis Ranch Complex on the northwestern portion of the site near Madonna Road, similar to the project. However, unlike the project, this alternative does not include a proposal to relocate, reconstruct, or otherwise preserve or document the historic San Luis Ranch Complex or its individually historic structures. Therefore, impacts to cultural resources under Alternative 2 would be greater to the project.

Hazards and Hazardous Materials. Potential impacts associated with the presence, transport, and use of hazardous materials, as well as the demolition of buildings, under Alternative 2 would be similar to the project. Potential hazards associated with the proximity of the project site to the San Luis Obispo County Regional Airport would also be similar, because this alternative, as with the project, would be consistent with the CALUPH Airport Safety Zones, which represent the extent of Airport-related safety hazard zones for people residing or working in these areas.

Hydrology and Water Quality. As shown in Figure 6-1, Alternative 2 would involve a larger overall development footprint. Therefore, this alternative would result in an incrementally increased amount of on-site grading in comparison to the project. Nevertheless, the final grading plan for this alternative would be required to comply with all County requirements to maintain adequate drainage and water quality standards. However, due to the substantial increase in re-grading that would be required to ensure adequate on-site drainage, potential impacts to water quality, under Alternative 2 would be greater than the proposed project.

Noise. Construction activity for Alternative 2, including trucks hauling material to and from the site, would still occur near noise sensitive receptors located approximately 75 feet to the southwest and west from the project site boundary across Prefumo Creek. As described in Section 4.10, *Noise*, mitigation is not available that would not reduce construction noise below the applicable City standards. Therefore, construction noise impacts under Alternative 2 would remain significant and unavoidable, similar to the project.

Potential operational noise impacts associated with on-site residential and commercial development under Alternative 2 would be similar to the project. However, this alternative would not be required to incorporate additional mitigation under CEQA to avoid or minimize



potential effects of noise associated with buildout under this alternative. As such, the potential adverse effects of impacts associated with noise would be greater when compared to the project.

Recreation. Alternative 2 would include an increased area of parkland within the San Luis Ranch Specific Plan Area in comparison to the proposed project, and would generate fewer residents reliant on parkland and recreational facilities in the City. Therefore, potential impacts to recreation facilities and land under Alternative 2 would be reduced when compared to the project.

<u>Utilities and Service Systems</u>. Although the overall extent of development on-site would be generally similar to the proposed project, Alternative 2 would not rely on City utilities. Because this alternative would be a County project surrounded by the City of San Luis Obispo, this alternative includes an on-site wastewater treatment plant to serve new development on the site. Overall, potential impacts to utilities and service systems in the City under Alternative 2 would be less than the project.

<u>Water Resources</u>. Alternative 2 would result in less residential and more commercial development in comparison to the project. Since this alternative would be under County jurisdiction, it would avoid placing additional demand on the City's water supply, which is supplied from multiple surface water sources. However, under County jurisdiction, this alternative would be required to rely on groundwater from the existing on-site wells. As such, Alternative 2 may result in increased water use from the on-site wells and, thus, increased demand on local groundwater sources. Overall, potential impacts to local surface water supplies would be less, but potential impacts to local groundwater would be greater than the project.

6.4.3 Alternative 3: Historical Resource Preservation

Description

This alternative assumes that the San Luis Ranch Farm Complex, as well as associated eucalyptus trees, located in the northwest portion of the project site would be retained, and that the proposed multi-family residential development would be relocated and integrated into the proposed single-family residential development area on the central portion of the project site. This configuration would likely result in fewer single-family homes and a corresponding increase in the number of multi-family or cluster-style residential development in order to preserve the total residential unit count on the project site. Figure 6-2 depicts the approximate development area of this alternative.

Impact Analysis

Alternative 3 differs from the proposed San Luis Ranch Specific Plan primarily by avoiding the historically significant San Luis Ranch Farm Complex, and transferring development intensity to other portions of the site. Thus, the primary effect would be the avoidance of impacts to cultural resources and related issues of land use/policy consistency and transportation and circulation. A brief summary of other CEQA issues under Alternative 3 is presented at the end of this discussion.

Cultural Resources. Under Alternative 3, no development would occur on the northwest portion of the project site near Madonna Road, where the San Luis Ranch Complex is located. The existing historic San Luis Ranch Complex, including the main residence and the main barn,





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Historic Resource Preservation Alternative Development Area

both of which are eligible for listing in the California Register of Historical Resources (CRHR), would be retained in full. The main residence and barn/viewing stand, which are proposed for adaptive reuse within the Agricultural Heritage and Learning Center under the project, would remain in their existing location and would not be adaptively reused under Alternative 3. Therefore, Alternative 3 would not result in adverse changes to individually identified historic structures or the historic context of the San Luis Ranch Complex, which is collectively identified as historically significant. Furthermore, Alternative 3 would not conflict with Conservation and Open Space Element Policy 3.3.1, Historic Preservation, which states that significant historic and architectural resources should be identified, preserved, and rehabilitated, or Conservation and Open Space Element Policy 3.3.2, Demolitions, which prohibits demolition or substantial changes in outward appearance of historically or architecturally significant buildings, unless doing so is necessary to remove a threat to health and safety and other means to eliminate or reduce the threat to acceptable levels are infeasible. Overall, Alternative 3 would avoid the significant and unavoidable impacts to historic resources identified for the project, and impacts to cultural resources would be less than significant.

Land Use/Policy Consistency. Under Alternative 3, the historic San Luis Ranch Complex located on the northwest portion of the project site would be retained in full. As a result, Alternative 3 would not conflict with General Plan Land Use Element Policy 1.10.4 (Design Standards) or Conservation and Open Space Element Policy 3.3.2 (Demolitions).

In addition, Alternative 3 would provide the same amount of parkland as the project – 3.4 acres – which is lower than the minimum of 5.8 acres required by the performance standards described in Land Use Element Policy 8.1.4. (SP-2, San Luis Ranch (Dalidio) Specific Plan Area). As a result, Alternative 3 would be similarly inconsistent with this policy in the City's General Plan. Overall, Alternative 3 would result in fewer General Plan policy inconsistencies when compared to the project, but would still result in a significant and unavoidable land use impact related to policy consistency, similar to the project.

Transportation and Circulation. Under Alternative 3, no development would occur on the northwest portion of the project site near Madonna Road, where the San Luis Ranch Complex is located. The proposed roadway connection through this portion of the project site from Madonna Road (San Luis Ranch Way) would not be constructed. This would result in increased traffic loading on other access roadways into the Specific Plan area, including Froom Ranch Way, Dalidio Drive, and the proposed Prado Road extension. In addition, Alternative 3 would retain the same number of residential units in a smaller area onsite, which would result in increased residential density as compared to the project. Medium- and high-density residential uses typically have lower vehicle trip rates than single-family residential uses. Accordingly, Alternative 3 would result in incrementally reduced impacts to area intersections and roadway segments when compared to the project. Nevertheless, project-generated vehicle trips would still be expected to exceed the capacity and LOS thresholds for area intersections and roadways, particularly at the Froom Ranch Way, Dalidio Drive, and the Prado Road access routes onto the project site. Therefore, Alternative 3 would not avoid the significant and unavoidable transportation impacts identified in this EIR for the project. Overall, impacts to transportation and circulation would be similar to or slightly increased due to the loss of the proposed San Luis Ranch Way access route in comparison the project.

Other Environmental Topics.

Aesthetics. Alternative 3 would retain the eucalyptus trees and San Luis Ranch Complex on the northwest portion of the project site near Madonna Road. Therefore, Alternative 3 would not alter existing foreground views from Madonna Road to a more developed condition. Potential impacts to visual and aesthetic resources under Alternative 3 would be slightly reduced in comparison to the project when viewed from Madonna Road, but may be slightly increased from other viewpoints, including U.S. 101 and Prado Road, due to increased/concentrated development intensity on the central portion of the site. As with the project, development under Alternative 3 would be subject to review by the Architectural Review Committee to ensure compliance with the City's applicable design guidelines similar to the project. Overall, aesthetic impacts would remain less than significant.

<u>Agricultural Resources</u>. Potential impacts to agricultural resources under Alternative 3, as well as the mitigation measures that would avoid or minimize these effects, would be similar to the project.

Air Quality. Alternative 3 would result in the development of the same number of residential units and amount of commercial square footage as the project. However, retaining the same number of residential units in a smaller area onsite would result in increased residential density as compared to the project. Medium- and high-density residential uses typically have lower vehicle trip rates than single-family residential uses. Accordingly, Alternative 3 would result in incrementally reduced VMT and associated air quality emissions when compared to the project. Nevertheless, the incrementally reduced VMT associated with Alternative 3 would still be expected to exceed the anticipated increase in regional population. Therefore, Alternative 3 would not avoid the significant and unavoidable air quality impact identified in this EIR for the project as proposed. Overall, impacts to air quality would be incrementally less than the project.

Biological Resources. Alternative 3 would reduce the overall development footprint and retain the existing mature eucalyptus trees on the northwest portion of the project site near Madonna Road. The eucalyptus trees provide nesting habitat for raptors, great blue herons, and a variety of songbirds, roosting habitat for owls and turkey vultures, and are a historic monarch butterfly overwintering site. These trees also provide foraging habitat for birds and small mammals. As such, retaining the on-site eucalyptus trees under Alternative 3 would reduce potential impacts to biological resources as compared to the project. Because the extent of residential and commercial development would be similar on other portions of the project site, potential impacts to biological resources would remain potentially significant, and the mitigation measures that would avoid or minimize these effects, would be similar to the project.

Greenhouse Gas Emissions. Alternative 3 would result in the development of the same number of residential units and amount of commercial square footage as the project. However, retaining the same number of residential units in a smaller area onsite would result in increased residential density as compared to the project. Medium- and high-density residential uses typically have lower vehicle trip rates than single-family residential uses. Accordingly, Alternative 3 would result in incrementally reduced VMT and associated GHG emissions when compared to the project.

<u>Hazards and Hazardous Materials</u>. Potential impacts associated with the presence, transport and use of hazardous materials, the demolition of buildings, and the proximity of the San Luis Obispo County Regional Airport under Alternative 3, as well as the mitigation measures that would avoid or minimize these effects, would be similar to the project.

Hydrology and Water Quality. Alternative 3 would result in a similar overall level of residential and commercial development to the project. However, since Alternative 3 would not involve development on the northwest portion of the site near Madonna Road, Alternative 3 would involve less overall on-site grading in comparison to the project. Nevertheless, the final grading plan for this alternative would be expected to show a similar overall drainage pattern to the project, with the residential and commercial development area being regraded to a higher election to raise it above the 100-year floodplain, and site drainage being conducted south and west via Cerro San Luis Channel and Prefumo Creek. Therefore, potential impacts to water quality and drainage patterns and infrastructure under Alternative 3, as well as the mitigation measures that would avoid or minimize these effects, would be slightly less or similar to the project.

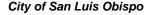
Noise. Alternative 3 would result in the development of the same amount of residential units and commercial square footage as the project, but in a smaller area on the project site. The revised project footprint under Alternative 3 would result in construction activity being located farther from Laguna Lake Park, which is located approximately 110 feet to the north of the project site across Madonna Road. However, construction activity for Alternative 3, including trucks hauling material to and from the site, would still occur near noise sensitive receptors located approximately 75 feet to the southwest and west from the project site boundary across Prefumo Creek. As described in Section 4.10, *Noise*, mitigation is not available that would not reduce construction noise below the applicable City standards. Therefore, construction noise impacts under Alternative 3 would remain significant and unavoidable, similar to the project.

Alternative 3 would result in a similar overall level of residential and commercial development to the project, but would locate residential development further from Madonna Road, and would result in incrementally fewer new vehicle trips on area roadways. Mitigation required to avoid or minimize operational noise impacts would be similar to the project; however, potential operational noise impacts under Alternative 3, would be incrementally reduced in comparison to the project.

<u>Recreation</u>. Alternative 3 would result in a similar overall level of residential and commercial development to the project. Therefore, potential impacts to recreation facilities and land under Alternative 3, and the mitigation measures that would avoid or minimize these effects, would be similar to the project.

<u>Utilities and Service Systems</u>. Alternative 3 would result in a similar overall level of residential and commercial development to the project. Therefore, potential impacts to utilities and service systems in the City under Alternative 3 would be similar to the project and would remain less than significant.

<u>Water Resources</u>. Alternative 3 would result in a similar overall level of residential and commercial development to the project. As such, potential impacts associated with demand on local water supply under Alternative 3, including demand on City municipal and groundwater irrigation well water supply, would be similar to the project.



6.4.4 Alternative 4: 50% On-Site Agriculture/Open Space

Description

The intent of this alternative is to retain 50 percent of the net site acreage as on-site agricultural and open space uses to be consistent on-site with the City's General Plan Land Use Element Policy 8.1.4.f. This alternative would retain the portion of land designated for commercial uses (NC) southeast of Froom Ranch Way and southwest of Prado Road in agriculture. This modification would preserve approximately 3.6 acres of additional on-site agricultural area in comparison to the proposed project. In addition, this alternative would shift the alignment of Froom Ranch Way to the northwest to retain a minimum of one additional acre of agricultural area in comparison to the proposed project. The modified alignment of Froom Ranch Way would reduce the portion of the site available for low-medium density residential (NG-10) and medium density residential (NG-23), resulting in a reduction in total residential units on the project site. For this analysis, this alternative assumes that the realignment of Froom Ranch Way would eliminate the southernmost row of low-medium density residential and medium density residential lots, resulting in a total reduction of 31 low-medium density residential units and 7 medium density residential units. Removal of these residential units would be expected to result in a corresponding reduction in the 80-unit affordable housing density bonus. Therefore, this alternative assumes that the overall residential buildout of the project site would be reduced from 580 units to 536 units. In combination, these two modifications would retain a minimum of 57.3 acres of agricultural area on the project site, which would result in a minimum of 50 percent of the net site acreage being retained in agricultural and open space uses. Figure 6-3 depicts the approximate development area of this alternative.

This alternative would be consistent on-site with the City's General Plan Land Use Element Policy 8.1.4.f, which requires that future development on the San Luis Ranch property dedicate one half of the total land or easements for open space use, and that land dedicated to agriculture shall be of size, location and configuration appropriate to maintain a viable, working agricultural operation.

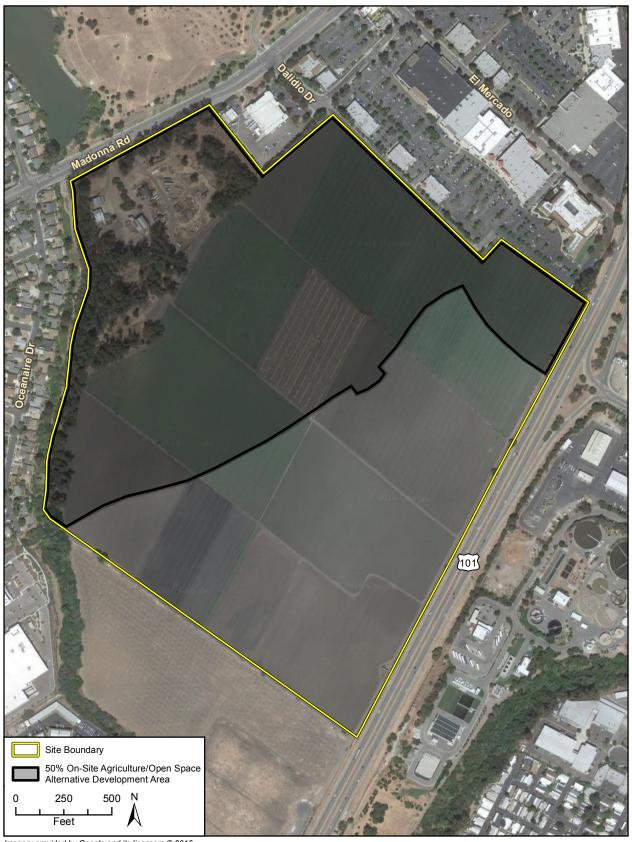
Land Use Element Policy 8.1.4. SP-2, San Luis Ranch (Dalidio) Specific Plan Area.

Purpose: This project site should be developed as a mixed use project that maintains the agricultural heritage of the site, provides a commercial/office transition to the existing commercial center to the north, and provides a diverse housing experience. Protection of the adjacent creek and a well-planned integration into the existing circulation system will be required.

The specific plan for this area should consider and address the following land use and design issues.

f. Maintain significant agricultural and open space resources on site (see Policy 1.13.8.B). Land dedicated to Agriculture shall be of size, location and configuration appropriate to maintain a viable, working agricultural operation.

General Plan Land Use Element Policy 8.1.4.f includes the following performance standards, which include the requirement that the San Luis Ranch Specific Plan maintain a minimum of 50% of the site acreage in open space/agriculture, but notes that the City Council may consider allowing a portion of this requirement to be met through and off-site dedication.



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50% On-Site Agriculture/Open Space Alternative Development Area

Туре	Designations Allowed	% of Site	Minimum	Maximum
Residential	LDR, MDR, MHDR, HDR		350 units	500 units
Commercial	NC, CC		50,000 sf	200,000 sf
Office/High tech	0		50,000 sf	150,000 sf
Hotel/Visitor- serving				200 rooms
Parks	PARK		5.8 acres	
Open Space/ Agriculture	OS, AG	Minimum 50% ¹		No maximum
Public	n/a			
Infrastructure	n/a			

^{1.} The City Council may consider allowing a portion of required open space to be met through off-site dedication provided:

- A substantial multiplier for the amount of open space is provided for the off-site property exchanged to meet the on-site requirement; and
- b. Off-site land is of similar agricultural and visual value to the community; and
- Off-site land is protected through an easement, dedication or fee title in perpetuity for agriculture/ open space.

Impact Analysis

Alternative 4 differs from the proposed San Luis Ranch Specific Plan primarily by avoiding conversion of agricultural land to commercial and residential uses in the southeast corner of the Specific Plan Area, and reducing the number of residential units. Thus, the primary effect would be the avoidance of impacts to agricultural resources and related issues of land use/policy consistency and transportation and circulation. A brief summary of other CEQA issues under Alternative 4 is presented at the end of this discussion.

Agriculture Resources. Alternative 4 would retain a minimum of 57.3 acres of agricultural area on the project site, which would result in a minimum of 50 percent of the net site acreage being preserved in agricultural and open space uses. Accordingly, Alternative 4 would be consistent with the City's General Plan Land Use Element Policy 8.1.4.f, which requires that future development on the San Luis Ranch property dedicate one half of the total land or easements for open space use, either on-site or off-site through dedication of an off-site agricultural conservation easement/deed restriction, and that land dedicated to agriculture shall be of size, location and configuration appropriate to maintain a viable, working agricultural operation. Because Alternative 4 would convert fewer acres of Prime agricultural land to non-agricultural uses, this alternative would have a reduced impact in comparison to the project.

Land Use/Policy Consistency. Alternative 4 would be consistent on-site with the City's General Plan Land Use Element Policy 8.1.4.f, which requires that future development on the San Luis Ranch property dedicate one half of the total land or easements for open space use, and that land dedicated to agriculture shall be of size, location and configuration appropriate to maintain a viable, working agricultural operation. However, Alternative 4 would remain potentially inconsistent with General Plan Land Use Element Policy 1.10.4 (Design Standards), Circulation Element Policy 6.1.2 (Multimodal Level of Service Objectives), Conservation and

Open Space Element Policy 3.3.2 (Demolitions), and Conservation and Open Space Element Policy 3.3.3 (Historical Documentation), similar to the project. Overall, Alternative 4 would result in similar potential General Plan policy inconsistencies when compared to the project, and would still result in a significant and unavoidable land use impact related to policy consistency.

Transportation and Circulation. Alternative 4 would result in 44 fewer residential units (a reduction of approximately 7 percent of the project's planned residential buildout) and approximately one-third less commercial square footage than the project. Accordingly, Alternative 4 would result in incrementally reduced VMT. Nevertheless, vehicle trips generated by Alternative 4 would still be expected to exceed the capacity and LOS thresholds for area intersections and roadways, requiring similar transportation mitigation in comparison to the project. Therefore, Alternative 4 would not avoid the significant and unavoidable transportation impacts identified in this EIR for the project. Overall, impacts to transportation and circulation under Alternative 4 would be slightly reduced in comparison to the project.

Other Issues.

Aesthetics. Alternative 4 would retain approximately 3.6 acres of agricultural land southeast of Froom Ranch Way and southwest of Prado Drive Road, as well as approximately 1.0 acre of agricultural land along the southwestern side of Froom Ranch Way as a result of the slight realignment of this roadway. However, Alternative 4 would still involve commercial and residential development that would alter existing foreground views from U.S. 101 to a more developed condition. Potential impacts to visual scenic resources may be slightly reduced in comparison to the project, but would remain less than significant. As with the proposed project, development under Alternative 4 would be subject to review by the Architectural Review Committee to ensure compliance with the City's applicable design guidelines similar to the project. Overall, aesthetic impacts would remain less than significant.

Air Quality. Alternative 4 would result in 44 fewer residential units (a reduction of approximately 7 percent of the project's planned residential buildout) and approximately one-third less commercial square footage than the project. Accordingly, Alternative 4 would result in incrementally reduced VMT and associated criteria pollutant emissions in comparison to the project. Nevertheless, criteria pollutant emissions associated with Alternative 4 would still exceed applicable SLOAPCD emissions thresholds, and similar mitigation would be required in comparison to the project. In addition, the incremental reduction in VMT associated with Alternative 4 would still exceed the anticipated increase in regional population. Therefore, impacts to air quality under Alternative 4 would be slightly reduced in comparison to the project, but would remain significant and unavoidable.

<u>Biological Resources</u>. Alternative 4 would slightly reduce the overall development footprint. However, this incremental reduction in development area would occur in areas of existing agricultural development, and would not result in a substantial reduction in potential areas that may contain sensitive biological resources, such as the existing eucalyptus grove on the northwestern portion of the site along Madonna Road, or the riparian corridor along Prefumo Creek. Because the extent of residential and commercial development would be similar on other portions of the project site, potential impacts to biological resources would

remain potentially significant, and the mitigation measures that would avoid or minimize these effects, would be similar to the project.

<u>Cultural Resources</u>. Alternative 4 would slightly reduce the overall development footprint. However, this incremental reduction in development area would occur in areas of existing agricultural development. The historic San Luis Ranch Complex, including individually historic structures, on the northwestern portion of the site near Madonna Road would be removed or relocated, similar to the project. The extent of residential and commercial development under Alternative 4 would be generally similar to the project on other portions of the project site. Therefore, impacts to cultural resources under Alternative 4 would be similar to the project and would remain significant and unavoidable.

Greenhouse Gas Emissions. Alternative 4 would result in 44 fewer residential units (a reduction of approximately 7 percent of the project's planned residential buildout) and approximately one-third less commercial square footage than the project. Accordingly, Alternative 4 would result in incrementally reduced VMT and associated GHG emissions in comparison to the project.

<u>Hazards and Hazardous Materials</u>. Potential impacts associated with the presence, transport and use of hazardous materials, the demolition of buildings, and the proximity of the San Luis Obispo County Regional Airport under Alternative 4, as well as the mitigation measures that would avoid or minimize these effects, would be similar to the project.

Hydrology and Water Quality. Alternative 4 would result in reduced overall level of residential and commercial development when compared to the project. Accordingly, Alternative 4 would involve an incrementally reduced amount of on-site grading when compared to the project. Nevertheless, the final grading plan for this alternative would be expected to show a similar overall drainage pattern to the project, with the residential and commercial development area being regraded to a higher election to raise it above the 100-year floodplain, and site drainage being conducted south and west via Cerro San Luis Channel and Prefumo Creek. Overall, potential impacts to water quality and drainage patterns and infrastructure under Alternative 4, as well as the mitigation measures that would avoid or minimize these effects, would be slightly less or similar to the project.

Noise. Construction activity for Alternative 4, including trucks hauling material to and from the site, would still occur near noise sensitive receptors located approximately 75 feet to the southwest and west from the project site boundary across Prefumo Creek. As described in Section 4.10, *Noise*, mitigation is not available that would not reduce construction noise below the applicable City standards. Therefore, construction noise impacts under Alternative 4 would remain significant and unavoidable, similar to the project.

Alternative 4 would result in 44 fewer residential units (a reduction of approximately 7 percent of the project's planned residential buildout) and approximately one-third less commercial square footage than the project. As a result potential operational noise impacts under Alternative 4 would be incrementally reduced when compared to the project. Nevertheless, Alternative 4 would result in the development of on-site residences located adjacent to proposed retail uses for which the Specific Plan does not include standards that would ensure that noise levels would remain below applicable City standards. Therefore, operational noise

impacts under Alternative 4, as well as the mitigation measures that would avoid or minimize these effects, would be similar to the project.

<u>Recreation</u>. Alternative 4 would include a similar area of parkland or recreational facilities provided within the San Luis Ranch Specific Plan Area. Therefore, potential impacts to recreation facilities and land under Alternative 4, and the mitigation measures that would avoid or minimize these effects, would be similar to the project.

<u>Utilities and Service Systems</u>. Alternative 4 would result in less residential and commercial development than the project. Therefore, potential impacts to utilities and service systems in the City under Alternative 4 would be incrementally reduced when compared to the project, and would remain less than significant.

<u>Water Resources</u>. Alternative 4 would result in less residential and commercial development than the project. Therefore, potential impacts associated with demand on local water supply under Alternative 4, including demand on City municipal and groundwater irrigation well water supply, would be slightly reduced when compared to the project, and would remain less than significant.

6.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Section 15126.6(e)(2) of the *State CEQA Guidelines* requires that an analysis of project alternatives identify an environmentally superior alternative among the alternatives evaluated in the EIR. In general, the environmentally superior alternative as defined by CEQA should minimize adverse impacts to the project site and its surrounding environment.

This section evaluates the impact conclusions for the San Luis Ranch Specific Plan and the four (4) alternatives under consideration. It then identifies the environmentally superior alternative for each issue area. In accordance with the *State CEQA Guidelines*, if the No Project Alternative is identified as the Environmentally Superior Alternative, an alternative among the remaining scenarios which is environmentally superior must also be identified.

Table 6-1 summarizes the environmental advantages and disadvantages associated with the proposed project and the analyzed alternatives. CEQA Guidelines section 15126.6 states that if the environmentally superior alternative is the No Project Alternative, the EIR shall also identify an environmentally superior alternative from among the other alternatives.

Table 6-1
Alternative Impact Comparison to the San Luis Ranch Specific Plan

Issue	No Project		Altamative 2	Alta-madia-a		
	Alternative 1: No Project/No Development	Alterative 2: No Project, Measure J Entitlements	Alternative 3: Historical Resource Preservation	Alternative 4: 50% On-Site Agriculture/Open Space		
Major Issues (EIR Identifies significant and unavoidable impacts)						
Air Quality	Less	Greater	Less	Less		
Cultural Resources	Less	Greater	Less	Similar		
Greenhouse Gas Emissions	Less	Greater	Less	Less		
Land Use/Policy Consistency	Less	Greater	Less	Similar		
Noise	Less	Greater	Less	Similar		
Transportation	Less	Greater	Greater	Less		
Other Issues (EIR identifies impacts that are less than significant with or without mitigation)						
Aesthetics	Less	Greater	Similar	Less		
Agricultural Resources	Less	Greater	Similar	Less		
Biological Resources	Less	Greater	Less	Similar		
Hazards/ &Hazardous. Materials	Less	Similar	Similar	Similar		
Hydrology & Water Quality	Less	Greater	Less	Less		
Recreation	Less	Less	Similar	Similar		
Utilities & Service Systems	Less	Less	Similar	Less		
Water Resources	Less	Both Less (Surface Water) and Greater (Groundwater)	Similar	Less		
Overall	14 Less, 0 Greater	3 Less, 11 Greater	7 Less, 1 Greater	8 Less, 0 Greater		

Based on the comparison provided in Table 6-1, the No Project/No Development Alternative (Alternative 1) would result in the fewest adverse environmental effects. However, since this is the "No Project" alternative, CEQA requires that a separate alternative also be identified as the Environmentally Superior Alternative.

Alternative 2 would fail to meet most of the project-specific objectives. As shown in Table 6-1, Alternative 2 would result in increased physical environmental impacts when compared to the project and would not achieve many of the planning goals included in the City's General Plan as they apply to the San Luis Ranch Specific Plan area.

As described in Section 6.4.4, Alternative 4 would not reduce any of the project's significant and unavoidable impacts to a level below significance thresholds. However, as shown in Table 6-1,

Alternative 4 would result in incrementally reduced impacts to several issue areas, including air quality, GHG emissions, transportation, aesthetics, and agricultural resources.

As described in Section 6.4.3, Alternative 3 would preserve the San Luis Ranch Complex, thereby avoiding the significant and unavoidable impact to historic resources identified for the project. This alternative would also reduce other potential environmental effects due to the preservation of the eucalyptus grove in the northwest portion of the project site along Madonna Road, and due to the reduced overall development footprint. As shown in Table 6-1, Alternative 3 would also result in reduced impacts to air quality, GHG emissions, noise, biological resources, land use/policy consistency, and hydrology and water quality, while resulting in slightly increased impacts to transportation (due to the loss of the proposed San Luis Ranch Way access route).

Alternative 3 would also achieve the basic objectives of the project. This alternative would provide infill growth for the City, and would be generally consistent with the General Plan with the existing historic structures on the project site. A variety of housing opportunities would be available, including affordable housing opportunities. The multimodal transportation network would continue to provide accessibility via automobile, bicycle, and pedestrian amenities, including the Bob Jones Regional Trail. The alternative would be similar to the project in its adherence to sustainable development practices and design features. Therefore, Alternative 3 is identified as the environmentally superior alternative over other alternatives, as shown in Table 6-1.



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