



8.0 Alternatives to the Proposed Action



8.0 ALTERNATIVES TO THE PROPOSED ACTION

8.1 INTRODUCTION

Section 15126.6 of the *CEQA Guidelines* requires the identification and evaluation of a range of reasonable alternatives designed to feasibly achieve the most basic objectives of the project, while avoiding or substantially lessening any of the significant environmental effects of the project. In addition, CEQA requires a comparative evaluation of the merits of the alternatives.

Pursuant to Section 15126.6 (f)(1) of the *CEQA Guidelines*, factors that may be taken into account when addressing the feasibility of alternatives include, but are not limited to, site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent). Although these factors do not present a strict limit on the scope of reasonable alternatives to be considered, they help establish the context in which “the rule of reason” is measured against when determining an appropriate range of alternatives sufficient to establish and foster meaningful public participation and informed decision-making.

8.1.1 SUMMARY OF PROJECT OBJECTIVES

An EIR must only discuss in detail an alternative that is capable of feasibly attaining most of the basic objectives associated with the action, while at the same time avoiding or substantially lessening any of the significant effects associated with the proposed project. A summary of the project objectives, as provided within Section 3.0, *Project Description*, is provided below:

1. Uphold and honor the Rancho Santa Margarita Master Plan;
2. Prepare Rancho Santa Margarita for the next 20 years;
3. Update the General Plan to ensure it meets new State requirements;
4. Maintain a balance of land uses to ensure compatibility now and in the decades to come; and
5. Maintain and support high quality-of-life, community satisfaction, and safety.

8.1.2 DETERMINATION OF ALTERNATIVES TO BE ANALYZED

The following alternatives have been identified for detailed analysis in this section:

- No Project/Existing General Plan; and
- Mixed-Use Land Use Alternative.



8.1.3 ALTERNATIVES ANALYSIS

Throughout the following analysis, impacts of alternatives are examined for each of the issue areas examined in Section 5.0 of this EIR. In this manner, the merits and impacts of each alternative can be compared to the General Plan Update, as proposed, on an issue-by-issue basis.

Only those impacts found significant and unavoidable are relevant in making the final determination of whether an alternative is environmentally superior or inferior to the proposed project. The General Plan Update would result in significant and unavoidable impacts in the following environmental issue areas:

AIR QUALITY

- Short-Term Construction Emissions
- Long-Term Mobile and Stationary Source Emissions
- Cumulative Air Quality
 - Short-term Construction Emissions
 - Long-term Mobile and Stationary Source Emissions

GREENHOUSE GAS EMISSIONS

- Greenhouse Gas (GHG) Emissions
- Cumulative GHG Emissions

Implementation of the identified mitigation measures can mitigate all other potentially significant impacts to less than significant levels. This section considers alternatives that could otherwise avoid or minimize these significant and unavoidable impacts. A description of each alternative and a comparative environmental evaluation of the impacts identified for the General Plan Update is provided below.

An EIR must identify an "environmentally superior" alternative and where the No Project Alternative is identified as environmentally superior, the EIR is then required to identify as environmentally superior an alternative from among the others evaluated. Each alternative's environmental impacts are compared to the proposed project and determined to be environmentally superior, inferior, or neutral. However, as stated above, only those impacts found to be significant and unavoidable for the proposed project are used in making the final determination of whether an alternative is environmentally superior or inferior to the proposed project.

8.2 NO PROJECT/EXISTING GENERAL PLAN ALTERNATIVE

8.2.1 DESCRIPTION

As required by CEQA Guidelines Section 15126.6 (e), the No Project/Existing General Plan Alternative assumes development of the City of Rancho Santa Margarita would occur in accordance with the current *City of Rancho Santa Margarita General Plan (2002*



General Plan), including its land use designations, development assumptions, and goals and policies. This Alternative assumes that ultimate development of the 2002 General Plan would occur and that the 2002 General Plan would continue to provide outdated information regarding several issues, including projections and policy direction that were identified in the early 2000s that are not reflective of existing socioeconomic data and anticipated development patterns. Further, the proposed Mixed-Use (MU) land use designation would not be adopted.

Table 8-1, *No Project/Existing General Plan Alternative Compared to the Proposed Project*, compares the assumed development potential associated with the 2002 General Plan and the General Plan Update.

Table 8-1
No Project/Existing General Plan Alternative Compared to the Proposed Project

Land Use Plan	Population	Dwelling Units	Non-Residential Square Feet
No Project/Existing 2002 General Plan Alternative	51,178	17,766 ¹	13,293,000
General Plan Update (proposed project)	51,404	18,294	9,133,253
Difference	-226	-528	+4,159,747
Notes: 1 There are currently 17,766 dwelling units within the City, which exceeds the residential development anticipated by the 2002 General Plan (16,996 dwelling units). For purposes of the No Project/Existing General Plan Alternative, the number of dwelling units is assumed to be equivalent to the number of dwelling units that are currently developed in the City.			

As shown, the No Project/Existing General Plan Alternative would result in no additional new dwelling units, since the number of existing dwelling units already exceeds the 2002 General Plan development projection of 16,996 units. Therefore, as indicated in Table 8-1, development assumed with the No Project/Existing General Plan Alternative would result in the following when compared to the General Plan Update:

- 226 fewer residents;
- 528 fewer dwelling units; and
- 4,159,747 additional square feet of non-residential uses.

8.2.2 IMPACT EVALUATION

LAND USE AND PLANNING

Under the No Project/Existing General Plan Alternative, the existing Land Use Element would continue to provide outdated information that does not reflect the current conditions or goals of the City (i.e., projections and policy direction identified in the early 2000s that are not reflective of existing socioeconomic data and anticipated development patterns). This Alternative would prevent the City from achieving some of the core objectives of the General Plan Update, including preparing the City for the next 20 years and updating the General Plan to meet new State requirements. Although substantial land use changes are not proposed, and existing uses would remain relatively unchanged under the General Plan Update, the No Project/Existing General Plan Alternative would not adequately address the current land use vision for the City as described in the General Plan Update. Further, given the passage of time since the 2002 General Plan was adopted, the goals and policies in the 2002 General Plan do not



address the more recent Southern California Association of Governments' (SCAG) 2016-2040 *Regional Transportation Plan/Sustainable Communities Strategies* (2016-2040 RTP/SCS) goals. As such, the No Project/Existing General Plan Alternative is considered environmentally inferior to the proposed project in this regard.

POPULATION, HOUSING, AND EMPLOYMENT

Given the time that has elapsed since the 2002 General Plan was adopted, the No Project/Existing General Plan Alternative does not reflect the most current population, employment, and housing numbers or projections, nor does it provide quantitative population, employment, and housing projections for the year 2040. As stated above, there are currently 17,766 dwelling units within the City, which already exceeds the 16,996 dwelling units anticipated by the 2002 General Plan. In contrast, the General Plan Update reflects existing population, employment, and housing conditions for the year 2016 and provides projections to 2040. Compared to the buildout projections of the 2002 General Plan, the General Plan Update projections show a more realistic planning framework of how the City is likely to be built out, which, based on historical development patterns and reasonable assumptions would result in more residential and less non-residential development. Further, the City's existing 2016 household and employment data already exceeds SCAG 2020 projections. The growth anticipated with the proposed General Plan Update would be considered in SCAG's updated growth forecasts for the City and would bring consistency to the two planning documents. Therefore, the No Project/Existing General Plan Alternative is considered environmentally inferior to the General Plan Update in this regard.

AESTHETICS AND LIGHT/GLARE

Both the No Project/Existing General Plan Alternative and the proposed project contemplate increased development within the City. Construction-related aesthetic impacts would be similarly less than significant under both development scenarios as impacts would be temporary and construction activities and equipment would be screened appropriately to minimize public views per Municipal Code requirements. The City is predominantly built out; therefore, future projects would likely occur as infill or redevelopment. Buildout of this Alternative would result in 528 fewer dwelling units but 4,159,747 additional square feet of nonresidential uses, which could impact the City's long-term visual character differently than buildout of the General Plan Update. With more nonresidential uses and fewer residential uses, buildout of the 2002 General Plan could result in a more commercial and business park setting in the City. Additionally, this Alternative would not introduce the Mixed-Use land use designation, which would allow a combination of commercial and residential uses together in the same area, creating more pedestrian and transit-oriented neighborhoods. Generally, the 2002 General Plan would not address the visual character of future development to the extent of the General Plan Update. For example, the General Plan Update includes goals and policies that calls for the maintenance of scenic resources, including the City's hillsides, ridgelines, and surface water resources; encouraging high-quality architectural and landscaping designs to preserve the City's small-town village character; and ensuring land use compatibility in terms of scale and style with existing developments. Thus, the No Project/Existing General Plan Alternative is considered environmentally inferior to the proposed project in this regard.



TRAFFIC AND CIRCULATION

As indicated in Table 5.4-3, Existing (2016) Roadway Segment Capacity Analysis, all existing roadway segments are currently operating at an acceptable level within each segment's average daily vehicle capacity threshold with the exception of the following three segments:

- Santa Margarita Parkway from Alicia Parkway to Avenida Empresa (No. 46) – Potentially Exceeds Capacity
- Santa Margarita Parkway from Avenida Empresa to SR-241 Eastbound Ramps (No. 47) – Approaching Capacity
- Santa Margarita Parkway from SR-241 Westbound Ramps to Avenida De Las Flores (No. 48) – Approaching Capacity

With implementation of the General Plan Update, all roadway segments would continue to operate at an acceptable level with the exception of the following four segments:

- Avenida Empresa from Santa Margarita Parkway to Aventura (No. 28) – Approaching Capacity
- Santa Margarita Parkway from Alicia Parkway to Avenida Empresa (No. 46) – Potentially Exceeds Capacity
- Santa Margarita Parkway from Avenida Empresa to SR-241 Eastbound Ramps (No. 47) – Approaching Capacity
- Santa Margarita Parkway from SR-241 Westbound Ramps to Avenida De Las Flores (No. 48) – Potentially Exceeds Capacity

While this Alternative would result in 528 fewer dwelling units, it would substantially increase non-residential development potential by 4,159,747 square feet, thereby increasing overall vehicle trip generation and peak hour trips. It is anticipated that greater traffic impacts would occur under the No Project/Existing General Plan Alternative due to the substantial non-residential growth anticipated by the 2002 General Plan. Further, this Alternative would not introduce a new Mixed-Use land use designation intended to allow more flexible, compact, and diverse uses that would reduce the need for vehicular trips within the area and encourage pedestrian activity. Further, the General Plan Update proposes goals and policies that would encourage mixed-use development, walkable neighborhoods, and multimodal opportunities to encourage the reduction of vehicle miles traveled (VMT) for residents and visitors of the City. Additional policies encourage improvements to the circulation system roadways in concert with land development to maintain sufficient levels of service. The No Project/Existing General Plan Alternative would not implement these goals and policies and would not introduce the new Mixed-Use land use designation. As such, this Alternative would result in greater traffic and circulation impacts and would be considered environmentally inferior to the proposed project.



AIR QUALITY

As detailed in Section 5.5, *Air Quality*, the General Plan Update would result in significant and unavoidable impacts related to short-term construction and long-term mobile and stationary source emissions as well as cumulative impacts to short- and long-term air quality emissions. Compared to the proposed project, this Alternative would result in 528 fewer dwelling units but 4,159,747 additional square feet of non-residential development. Thus, it is anticipated that development under the No Project/Existing General Plan Alternative would likely result in similar or greater impacts related to short-term construction emissions, long-term operational emissions, and cumulative construction and operational impacts. Further, the General Plan Update Land Use Element and Conservation/Open Space Element addresses potential air quality impacts by including updated goals and policies that reflect current regulatory requirements and guide development towards better jobs/housing balance, VMT reductions, and expanded transit opportunities. As the No Project/Existing General Plan Alternative would not include any of the new goals and policies or mitigation measures under the proposed project, this Alternative is considered environmentally inferior to the General Plan Update and impacts under this Alternative would also be significant and unavoidable.

NOISE

The No Project/Existing General Plan Alternative would anticipate new development on existing vacant land or through redevelopment of currently developed land, similar to the General Plan Update. This Alternative would introduce 528 fewer dwelling units and 4,159,747 additional square feet of nonresidential development compared to the proposed project. Therefore, new development under either scenario would result in additional noise from construction and operational (mobile and stationary sources) activities. Under both development scenarios, construction activities would be required to comply with the City's Noise Ordinance. Further, the 2002 General Plan and General Plan Update include similar goals and policies in each respective Noise Element that would reduce both transportation and non-transportation related noise impacts through land use planning, project design, and development review. As such, impacts would be similar, and the No Project/Existing General Plan Alternative is considered neither environmentally superior nor inferior.

GREENHOUSE GAS EMISSIONS

As detailed in Section 5.7, *Greenhouse Gas Emissions*, the General Plan Update would result in significant and unavoidable impacts related to GHG emissions. Compared to the proposed project, this Alternative would anticipate less residential development but substantially more non-residential development. Thus, it is anticipated that development under this Alternative would likely result in similar or greater significant unavoidable GHG impacts associated with more GHG emissions generated by non-residential uses (e.g., commercial and business park). Additionally, given the passage of time since the 2002 General Plan was adopted, current GHG regulations are not reflected in the 2002 General Plan goals and policies. In comparison, the General Plan Update includes several goals and policies in the Land Use Element and Conservation/Open Space Element that would help the City reduce its GHG emissions through the implementation of Citywide GHG-reducing programs and projects. Further, the General Plan Update



would be consistent with the California Air Resources Control Board (CARB) 2017 Scoping Plan, and SCAG's 2016-2040 RTP/SCS, which were both adopted after 2002 and were not considered in the development of the 2002 General Plan. As such, the No Project/Existing General Plan Alternative is considered environmentally inferior to the General Plan Update in this regard and impacts under this Alternative would also be significant and unavoidable.

GEOLOGY AND SOILS

Under both development scenarios, potential new development would result in a larger number of structures/people potentially exposed to substantial adverse effects associated with severe ground shaking, soil erosion, or ground failure. However, such impacts associated with either the No Project/Existing General Plan Alternative or the General Plan Update would be less than significant by adherence to and/or compliance with the California Building Code and Municipal Code requirements. While this Alternative would introduce 226 fewer residents, it would likely introduce more employees than the proposed project since the 2002 General Plan would anticipate 4,159,747 additional square feet of non-residential use. Thus, it can be anticipated that the number of people or structures that would potentially be exposed to seismic hazards would be similar under both development scenarios. Therefore, the No Project/Existing General Plan Alternative is considered neither environmentally superior nor inferior to the General Plan Update in this regard.

HYDROLOGY AND WATER QUALITY

The No Project/Existing General Plan Alternative and the General Plan Update would anticipate for new development of vacant land or redevelopment of existing uses, potentially resulting in hydrology, drainage, or water quality impacts. Development under the 2002 General Plan or the General Plan Update would be required to comply with applicable stormwater and water quality requirements in accordance with the San Diego Regional Water Quality Control Board (RWQCB), such as obtaining applicable construction permits, implementing a Water Quality Management Plan and/or Stormwater Pollution Prevention Plan and associated best management practices. Goals and policies under the 2002 General Plan and General Plan Update also address stormwater management and water quality, as well as conservation of water resources in order to reduce potential impacts. Overall, development in accordance with this Alternative and the General Plan Update would be required to comply with the same regulatory requirements to minimize hydrology and water quality impacts. As such, this Alternative is considered neither environmentally superior nor inferior to the General Plan Update in this regard.

HAZARDS AND HAZARDOUS MATERIALS

Implementation of this Alternative or the General Plan Update would potentially result in the expansion or development of facilities that could impact the health and safety of Rancho Santa Margarita residents and employees. Compared to the General Plan Update, this Alternative would reduce residential buildout potential and substantially increase non-residential growth. However, new development under either scenario would be subject to existing regulations, standards, and procedures mandated by



applicable local, State, and Federal laws and regulations. Compliance with these regulatory requirements would ensure risks related to hazards and hazardous materials during construction and operational activities of new projects are reduced to less than significant levels. Thus, this Alternative is considered neither environmentally superior nor inferior to the proposed project.

TRIBAL AND CULTURAL RESOURCES

The No Project/Existing General Plan Alternative and the General Plan Update would anticipate new development on existing vacant land, infill development, and redevelopment of currently developed properties. Therefore, potential impacts to known or unknown/undiscovered historical, archaeological, paleontological, or tribal cultural resources would be similar. Impacts under both development scenarios related to tribal and cultural resources would be less than significant upon compliance with local and State requirements and required mitigation measures. Therefore, the No Project/Existing General Plan Alternative is considered neither environmentally superior nor inferior to the proposed project in this regard.

BIOLOGICAL RESOURCES

Most of the City is built out; therefore, infill or redevelopment is more likely to occur under both this Alternative and the proposed project, which would avoid the City's sensitive biological resource areas (i.e., Trabuco and Tijeras Canyons and O'Neill Regional Park) designated as Open Space or Regional Open Space. As such, potential impacts to habitat modifications of any species identified as sensitive or special status species, riparian habitat, sensitive natural communities, federally protected wetlands, movement of native resident or migratory fish or wildlife species would be similar under the No Project/Existing General Plan Alternative and the General Plan Update. It is anticipated that impacts related to biological resources associated with either development scenario would be less than significant upon compliance with current regulatory requirements and required mitigation measures. Therefore, this Alternative is considered neither environmentally superior nor inferior to the proposed project in this regard.

PUBLIC SERVICES AND UTILITIES

Buildout of this Alternative would not represent the true level of service demand based on current conditions. Implementation of the General Plan Update would provide an update of existing public services and utilities and the levels of service provided to the City, including fire, police, school, parks and recreation, wastewater, water, and solid waste services. Growth associated with this Alternative would result in 528 fewer dwelling units but 4,159,747 additional square feet of nonresidential use in comparison to the General Plan Update.

Since 528 fewer dwelling units would be developed, this Alternative would also introduce fewer permanent residents into the City. Thus, demand for school services and parks and recreation would be reduced. However, fire and police services demand would likely be greater given that this Alternative would anticipate more than four million additional square feet of non-residential development in the City compared to the proposed project.



Utilizing wastewater generation factors of 200 gallons per day (gpd) per dwelling unit¹ and 225 gpd per 1,000 square feet of non-residential use, buildout of this Alternative would result in 6,544,125 gpd of wastewater while the General Plan Update would result in 5,713,782 gpd of wastewater. Further, utilizing solid waste generation factors of 12.23 pounds per day (ppd) per dwelling unit and 15 ppd per 1,000 square feet of non-residential, buildout of this Alternative would result in 416,673 ppd of solid waste while the General Plan Update would result in 360,734 ppd of solid waste. It can also be assumed that water demand under this Alternative would be greater given the substantial increase in allowable non-residential development compared to the proposed project.

As such, while demand for school and park services would be reduced, demand for other public services and utilities, including fire, police, wastewater, water, and solid waste services would be greater under this Alternative. The No Project/Existing General Plan Alternative is considered environmentally inferior to the proposed project in this regard.

CONCLUSION

The No Project/Existing General Plan Alternative would result in greater impacts for land use and planning; population, housing, and employment; aesthetics and light/glare; traffic and circulation; air quality; GHG emissions; and public services and utilities. This Alternative would result in similar impacts to the General Plan Update for noise; geology and soils; hydrology and water quality; hazards and hazardous materials; tribal and cultural resources; and biological resources. It should be noted that this Alternative would not reduce or eliminate the proposed project's significant and unavoidable impacts related to air quality and GHG emissions.

The No Project/Existing General Plan Alternative would not meet two of the project objectives. Given the passage of time, this Alternative (the 2002 General Plan) would not prepare Rancho Santa Margarita for the next 20 years (Objective No. 2) nor would it update the General Plan to meet new State requirements (Objective No. 3). Additionally, this Alternative would maintain a balance of compatible land uses now and into the future (Objective No. 4) to a lesser degree than the General Plan Update as development patterns and growth anticipated in the 2002 General Plan do not currently align with existing conditions or future anticipated growth. However, this Alternative would still uphold and honor the Rancho Santa Margarita Master Plan and maintain and support high quality of life, community satisfaction, and safety (Objective No. 1 and 5).

8.3 MIXED-USE LAND USE ALTERNATIVE

8.3.1 DESCRIPTION

The Mixed-Use Land Use Alternative assumes the General Plan Update would be adopted as proposed; however, this Alternative would assign the Mixed-Use (MU) land use designation within the City's commercial core; refer to Exhibit 8-1, *Mixed-Use Land*

¹ An average wastewater generation factor of 200 gpd per day per residential dwelling unit (average of single-family [225 gpd per day] and multi-family [175 gpd per day] factors) is utilized in this section, in comparison to Section 5.18, *Wastewater*, since a complete breakdown of single-family and multi-family units from the residential land use designations of the 2002 General Plan is unavailable.



Use Alternative. Development of this Alternative assumes all new residential growth (552 dwelling units) and approximately 323,374 square feet of new non-residential development, primarily general commercial uses, would occur within these mixed-use areas. Compared to the proposed project, this Alternative assumes a slight increase in residential development (552 dwelling units) compared to the proposed project (528 dwelling units) and a slight reduction in net non-residential development (2,961,562 square feet) compared to the proposed project (3,085,014 square feet).

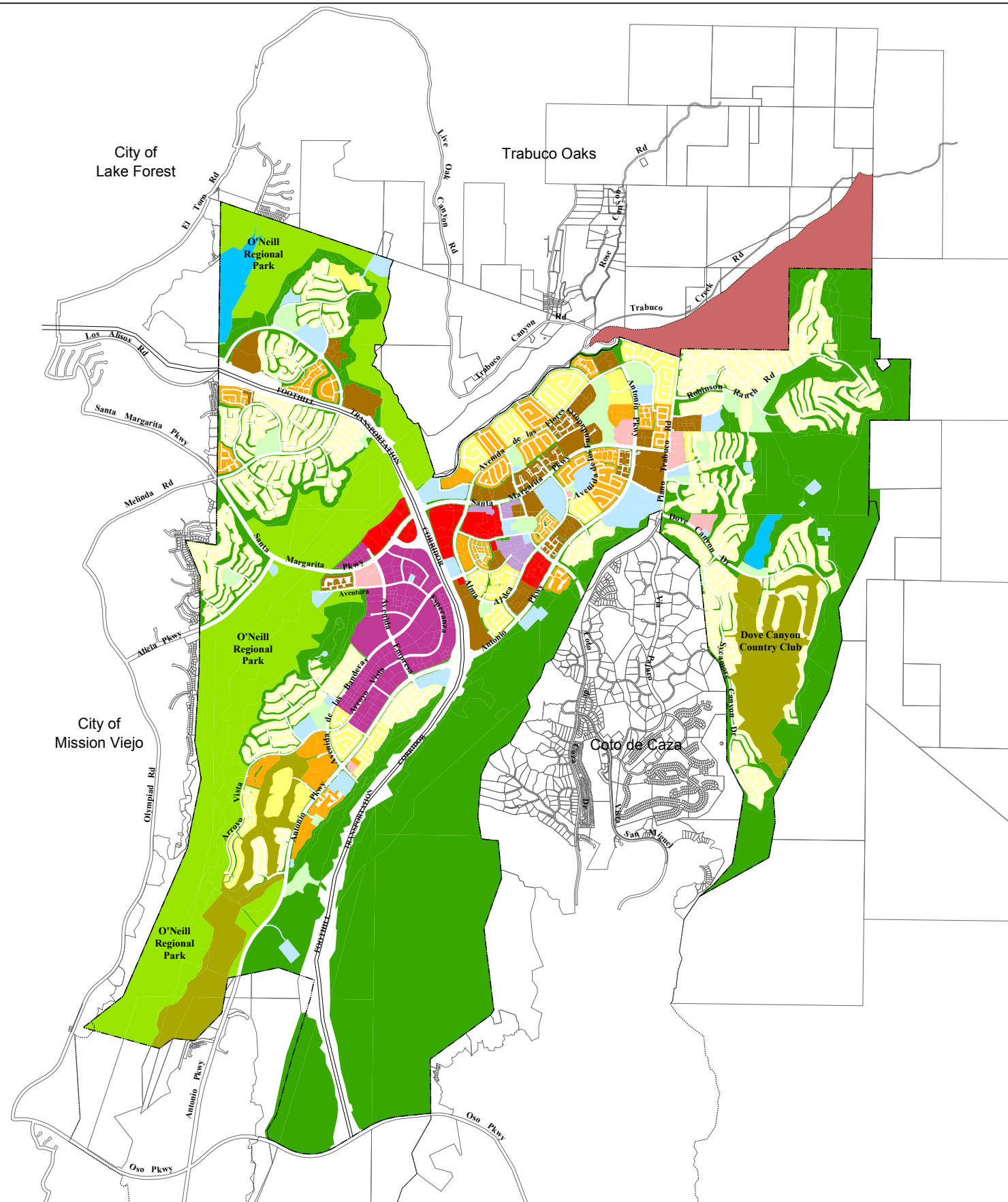
Table 8-2, *Mixed-Use Land Use Alternative Compared to the Proposed Project*, compares the development potential associated with the General Plan Update and the Mixed-Use Land Use Alternative.

Table 8-2
Mixed-Use Land Use Alternative Compared to the Proposed Project

Land Use Plan	Population ¹	Dwelling Units		Non-Residential Square Feet	
		Net Growth	Total	Net Growth	Total
Mixed-Use Land Use Alternative	51,471	552	18,318	2,961,562	9,009,801
General Plan Update (proposed project)	51,404	528	18,294	3,085,014	9,133,253
Difference	+67	+24		-123,452	
Notes:					
1 Based on 4.1 percent vacancy rate (California Department of Finance) and household size of 2.93.					

As indicated in Table 8-2, the Mixed-Use Land Use Alternative would anticipate the following when compared to the General Plan Update:

- 67 additional residents;
- 24 additional dwelling units; and
- 123,452 fewer square feet of non-residential uses.



Legend

- Low Density Residential
(0-7.0 Units/Net Acre, Average 6.5 Units/Net Acre)
- Low-Medium Density Residential
(7.0-11.0 Units/Net Acre, Average 10.0 Units/Net Acre)
- Medium Density Residential
(11.0-18.0 Units/Net Acre, Average 14.3 Units/Net Acre)
- High Density Residential
(18.0-25.0 Units/Net Acre, Average 20.0 Units/Net Acre)
- Mixed Use
- Commercial General
- Neighborhood Commercial
- Business Park
- Community Facility
- Park
- Open Space
- Open Space Golf
- Regional Open Space
- Water
- Future Planned Community
- City Boundary
- Sphere of Influence



0 2,200 4,400 Feet

Source: City of Rancho Santa Margarita,
July 2015



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8.3.2 IMPACT EVALUATION

LAND USE AND PLANNING

Similar to the proposed project, this Alternative would update the existing General Plan with updated baseline conditions and goals and policies that address the community's needs for the next 20 years through 2040. While this Alternative would assign the MU land use designation within the City, this Alternative would not result in any impact changes related to land use and planning. Goals and policies in the General Plan Update related to mixed-use development would remain the same. This Alternative would also meet new State requirements for general plans and would be consistent with the 2016-2040 RTP/SCS goals. Overall, the Mixed-Use Land Use Alternative is considered neither environmentally superior nor inferior to the proposed project in this regard.

POPULATION, HOUSING, AND EMPLOYMENT

Similar to the General Plan Update, this Alternative would update the City's environmental baseline conditions and development projections through 2040. As shown in Table 8-2, the Mixed-Use Land Use Alternative would anticipate a slight increase in dwelling units (552 units) compared to the General Plan Update (528 units), which would result in a slight population increase from 51,404 to 51,471 residents. Both the General Plan Update and Mixed-Use Land Use Alternative account for population growth and establish goals and policies to reduce potential growth-related impacts. The net increase in population and housing is nominal and would result in similar less than significant impacts.

This Alternative anticipates approximately 123,452 fewer square feet of non-residential development compared to the proposed project. The reduction in non-residential development is nominal and would not result in a substantial decrease in employment opportunities. Overall, population, housing, and employment impacts would be the same, and this Alternative is considered neither environmentally superior nor inferior to the General Plan Update in this regard.

AESTHETICS AND LIGHT/GLARE

Both the General Plan Update and Mixed-Use Land Use Alternative would anticipate increased development within the City through predominantly infill and redevelopment. While this Alternative would slightly increase residential development by 24 units and reduce net non-residential growth by 123,452 square feet, development would be concentrated within the commercial core of the City allowing for greater density and intensity than anticipated by the General Plan Update. Similar to the General Plan Update, the Mixed-Use Land Use designation would provide guidance as to the intensity and density of development, including limiting the scale and height to ensure any mixed-use development is compatible with the surrounding area. Future projects under both development scenarios would be subject to applicable Municipal Code requirements and be guided by relevant General Plan Update policies. As such, impacts in this regard would be similar and the Mixed-Use Land Use Alternative is considered neither environmentally superior nor inferior to the General Plan Update.



TRAFFIC AND CIRCULATION

The Mixed-Use Land Use Alternative would introduce the MU designation within the City's commercial core. All residential development and approximately 323,374 square feet of non-residential development (primarily general commercial) would be concentrated within mixed-use areas. The concentration of residential and general commercial development in the commercial core would encourage more flexible, compact, and diverse uses that would reduce the need for vehicles, encourage pedestrian and transit activity, and reduce overall VMT by approximately 25.6 percent compared to the General Plan Update. Overall, the Mixed-Use Land Use Alternative would result in reduced traffic and circulation impacts and would be considered environmentally superior to the proposed project.

AIR QUALITY

This Alternative would designate areas in the City's commercial core as mixed-use and would concentrate all new residential development and a portion of general commercial development within these areas. By introducing mixed-use development in the City, this Alternative would reduce the need for vehicles, encourage pedestrian and transit activity, and reduce overall VMT and associated air quality emissions. While construction-related air quality impacts would generally be similar to the proposed project, operational air quality impacts would be reduced with the introduction of mixed-use development. As stated above, this Alternative would reduce VMT by approximately 25.6 percent compared to the General Plan Update, and thus, would result in a proportional reduction in mobile operational air quality emissions. Although overall VMT under the Mixed-Use Land Use Alternative would be reduced when compared to the General Plan Update, significant unavoidable impacts related to construction-related emissions, regional operational emissions, and cumulative construction and operational impacts would continue to occur. As such, this Alternative would be environmentally superior to the proposed project, but impacts would remain significant and unavoidable.

NOISE

Development anticipated under this Alternative and the General Plan Update would result in additional noise from construction and operational activities associated with future projects. However, this Alternative would slightly increase residential development by 24 units and reduce non-residential development by approximately 123,452 square feet. Additionally, the introduction of MU development within the City's commercial core would reduce VMT and associated vehicular noise. Therefore, the Mixed-Use Land Use Alternative would reduce noise associated with both construction and operational activities. While all noise impacts would be reduced to less than significant levels with mitigation incorporated under the General Plan Update, this Alternative would be environmentally superior to the General Plan Update in this regard.

GREENHOUSE GAS EMISSIONS

As detailed in [Section 5.7](#), the General Plan Update would result in 6.5 million metric tons of carbon dioxide equivalent (MTCO₂eq) per year per service population, which exceeds the GHG emissions threshold of 3.3 MTCO₂eq per year per service population.



Development in accordance with this Alternative would slightly increase residential development by 24 units and reduce non-residential development by 123,452 square feet while introducing MU-designated areas in the City's commercial core. The introduction of mixed-use development in the City would reduce the need for vehicles, encourage pedestrian and transit activity, and reduce overall VMT and associated GHG emissions. As stated above, this Alternative would reduce VMT by approximately 25.6 percent, and thus, would result in a proportional reduction in mobile operational GHG emissions. A 25.6 percent reduction in mobile source GHG emissions would reduce overall GHG emissions below the GHG significance threshold. Therefore, this Alternative would reduce GHG emissions impacts compared to the General Plan Update to a less than significant level. Similar to the General Plan Update, this Alternative would not conflict with implementation of the 2017 Scoping Plan. Overall, the Mixed-Use Land Use Alternative would be environmentally superior to the proposed project and eliminate the project's significant and unavoidable impacts related to GHG emissions.

GEOLOGY AND SOILS

As detailed in [Table 8-2](#), this Alternative would result in 24 additional dwelling units and 123,452 fewer square feet of non-residential development compared to the proposed project. Since the Planning Area is the same under both development scenarios, similar physical constraints related to geology and soils exist. The potential for new development to expose people or structures to adverse effects associated with seismic ground shaking and geologic instabilities would be similar under this Alternative and the General Plan Update. Further, new development would be required to comply with the California Building Code and applicable Municipal Code requirements. Therefore, the Mixed-Use Land Use Alternative is considered neither environmentally superior nor inferior to the General Plan Update in this regard.

HYDROLOGY AND WATER QUALITY

Hydrology and water quality impacts associated with this Alternative would be similar to that of the General Plan Update. While this Alternative would result in slightly more residential development and slightly less nonresidential development than the proposed project, all new development would be subject to applicable stormwater and water quality requirements per the San Diego RWQCB. Additionally, the General Plan Update would be adopted as proposed, which includes goals and policies related to stormwater management and water quality. As such, development under this Alternative and the General Plan Update would be required to comply with the same regulatory requirements to minimize hydrology and water quality impacts. Overall, this Alternative is considered neither environmentally superior nor inferior to the General Plan Update in this regard.

HAZARDS AND HAZARDOUS MATERIALS

While this Alternative would slightly increase residential development by 24 units and reduce non-residential development by 123,452 square feet compared to the General Plan Update, all projects under either development scenario would be required to comply with local, State, and Federal regulatory requirements regarding the use, disposal, and transport of hazardous materials. Additionally, wildfire risks associated with



new development would be minimized upon compliance with the California Fire Code and Municipal Code requirements related to fuel modifications. Overall, this Alternative is considered neither environmentally superior nor inferior to the General Plan Update.

TRIBAL AND CULTURAL RESOURCES

Both the Mixed-Use Land Use Alternative and General Plan Update would anticipate new development on existing vacant land and infill and redevelopment sites. Therefore, potential impacts to known or unknown/undiscovered historical, archaeological, paleontological, and tribal cultural resources would be similar under both development scenarios. Although this Alternative would slightly increase residential development by 24 units and reduce non-residential development by 123,452 square feet compared to the proposed project, the potential to uncover unknown/undiscovered resources remains the same. Impacts related to cultural and tribal cultural resources under this Alternative and the General Plan Update would be less than significant with adherence to existing regulations and mitigation measures. Therefore, this Alternative is considered neither environmentally superior nor inferior to the proposed project in this regard.

BIOLOGICAL RESOURCES

As stated above, most of Rancho Santa Margarita is nearly built out. Therefore, new development is likely to occur as infill or redevelopment under both development scenarios and would avoid most of the City's sensitive biological resource areas, including Trabuco and Tijeras Canyons and O'Neill Regional Park. Since the Planning Area is the same under both development scenarios, similar biological constraints exist. Thus, while this Alternative would slightly increase net residential growth and slightly reduce net non-residential growth, the potential to impact sensitive or special status species, riparian habitat, sensitive natural communities, federally protected wetlands, and wildlife corridors would be similar under the Mixed-Use Land Use Alternative and the General Plan Update. Overall, impacts related to biological resources associated with either development scenario would be less than significant upon compliance with current regulatory requirements and required mitigation measures. Therefore, this Alternative is considered neither environmentally superior nor inferior to the proposed project in this regard.

PUBLIC SERVICES AND UTILITIES

Growth associated with both the General Plan Update and the Mixed-Use Land Use Alternative would result in increased demand for public services and utilities beyond existing conditions. The slight increase in residential development and slight decrease in non-residential development would not have a substantial reduction in impacts related to public services and utilities. Additionally, the concentration of all 552 new dwelling units and 323,374 square feet of general commercial use within the mixed-use areas could result in a localized increase in demand for public services, including fire, police, school, and library services. Local water, wastewater, and storm drain infrastructure may also be impacted to a greater degree with the implementation of the Mixed-Use Land Use Alternative. As such, this Alternative is considered environmentally inferior to the proposed project.



CONCLUSION

Compared to the General Plan Update, the Mixed-Use Land Use Alternative would result in greater impacts to public services and utilities but similar impacts for land use and planning; population, housing and employment; aesthetics and light/glare; geology and soils; hydrology and water quality; hazards and hazardous materials; tribal and cultural resources; and biological resources. This Alternative would reduce impacts with respect to traffic and circulation; air quality; noise; and GHG emissions. While the General Plan Update's significant and unavoidable air quality emissions would remain, the project's significant and unavoidable GHG emissions impacts would be eliminated under this Alternative.

This Alternative would meet all of the project objectives. It would uphold and honor the Rancho Santa Margarita Master Plan (Objective No. 1); prepare the City for the next 20 years (Objective No. 2); update the existing General Plan to meet new State requirements (Objective No. 3); maintain a balance of land uses to ensure compatibility (Objective No. 4); and maintain and support high quality-of-life, community satisfaction, and safety (Objective No. 5).

8.4 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Table 8-3, *Comparison of Alternatives*, summarizes the comparative analysis presented above (i.e., the alternatives compared to the proposed project). As noted above, the determination of an environmentally superior alternative is based on the consideration of how the alternative fulfills the project objectives and how the alternative either reduces significant, unavoidable impacts or substantially reduces the impacts to the surrounding environment. CEQA requires that an "Environmentally Superior Alternative" be identified among those considered; that is an alternative that would result in the fewest or least significant environmental impacts. Per *CEQA Guidelines* Section 15126.6(e), "if the environmentally superior alternative is the 'no project' alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives." Review of Table 8-3 indicates the Mixed-Use Land Use Alternative is the environmentally superior alternative. While it would not eliminate the General Plan Update's significant and unavoidable air quality impacts, the Mixed-Use Land Use Alternative would eliminate the project's significant and unavoidable GHG emissions impacts and avoid or lessen the majority of other environmental impacts associated with the proposed project.



**Table 8-3
Comparison of Alternatives**

Sections	No Project/Existing General Plan Alternative	Mixed-Use Land Use Alternative
Land Use and Planning	⬆	=
Population, Housing, and Employment	⬆	=
Aesthetics and Light/Glare	⬆	=
Traffic and Circulation	⬆	⬇
Air Quality*	⬆*	⬇*
Noise	=	⬇
Greenhouse Gas Emissions*	⬆*	⬇
Geology and Soils	=	=
Hydrology and Water Quality	=	=
Hazards and Hazardous Materials	=	=
Tribal and Cultural Resources	=	=
Biological Resources	=	=
Public Services and Utilities	⬆	⬆
<p>⬆ Indicates an impact that is greater than the project (environmentally inferior). ⬇ Indicates an impact that is less than the project (environmentally superior). = Indicates an impact that is equal to the project (neither environmentally superior nor inferior). * Indicates a significant and unavoidable impact.</p>		