6

# 6 PROJECT ALTERNATIVES

California Environmental Quality Act (CEQA) Guidelines, Section 15126.6, requires that an environmental impact report (EIR) describe a reasonable range of alternatives to a project or to the location of the project that could feasibly avoid or lessen significant environmental impacts while substantially attaining the basic objectives of the project. An EIR should also evaluate the comparative merits of the alternatives. This chapter sets forth potential alternatives to the proposed Mobility Element Update (MEU; Project) and provides a qualitative analysis of each alternative and a comparison of each alternative to the proposed Project. Key provisions of the CEQA Guidelines pertaining to the alternatives analysis are summarized as follows:

- The discussion of alternatives shall focus on alternatives to the project that include alternative locations that are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede, to some degree, the attainment of the project objectives or would be more costly.
- The No Project Alternative shall be evaluated along with its potential impacts. The No Project Alternative analysis shall discuss the existing conditions at the time the Notice of Preparation is published, as well as what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.
- If the project is other than a land use or regulatory plan, for example, a development project on an identifiable property, the No Project Alternative is the circumstance under which the project does not proceed. Here the discussion would compare the environmental effects of the property remaining in its existing state against the environmental effects that would occur if the project is approved.
- The range of alternatives required in an EIR is governed by a "rule of reason." Therefore, the EIR must evaluate 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 a proposed project.
- For alternative locations, only locations that would avoid or substantially lessen any of the significant effects of the project need to be considered for inclusion in the EIR.
- An EIR need not consider an alternative whose effects cannot be reasonably ascertained and whose implementation is remote and speculative.

The range of feasible alternatives is selected and discussed in a manner intended to foster meaningful public participation and informed decision-making. Among the factors that may be considered when addressing the feasibility of alternatives (as described in CEQA Guidelines Section 15126.6[f][1]) are environmental impacts, site suitability, economic viability, availability of infrastructure, City of Encinitas General Plan consistency, regulatory limitations, jurisdictional boundaries, and whether the proponent could reasonably acquire, control, or otherwise have access to the alternative site.

An EIR must briefly describe the rationale for selecting and rejecting alternatives. The lead agency may make an initial determination as to which alternatives are feasible and, therefore, merit in-depth consideration. Alternatives may be eliminated from detailed consideration in the EIR if they fail to meet project objectives, are infeasible, or do not avoid any significant environmental effects.

## 6.1 Project Impacts

As described in Chapter 3.0, the Project would result in less than significant impacts on air quality, greenhouse gas emissions, land use and planning, noise and vibration, public services and transportation and circulation. No significant and unavoidable impacts have been identified.

## 6.2 Project Objectives

In accordance with CEQA Guidelines Section 15124, the following primary objectives support the purpose of the Project, assist the lead agency in developing a reasonable range of alternatives to be evaluated in this Program Environmental Impact Report, and ultimately aid decision-makers in preparing findings and overriding considerations. The primary objective of the Project is to address the mobility needs of the City and to meet the requirements of state law.

The Project objectives are as follows:

1. Improve the safety, interconnectivity, accessibility, and comfort of all multimodal corridors to maximize the number of trips made by foot, transit and microtransit, micromobility, and bicycle to schools, parks, neighborhoods, the coast, and shopping areas.
2. Provide for, expand, and sustain a mix of transportation modes that meet the existing and future transportation needs of all Encinitas residents and visitors~~,~~ and minimize impacts to the community and environmental character.
3. Promote a long-term, coordinated program that provides standards and direction for improvements to the public right-of-way to enhance the identity of specific areas and create street design solutions to accommodate all modes of travel.
4. Update existing classifications within the Mobility Element so that the Encinitas circulation network responds to the present and future circulation needs of all users.
5. Consolidate existing and new policies in its various mode-specific, strategic plans—including the Climate Action Plan, Modal Alternatives Plan, Rail Corridor Cross Connect Implementation Plan, and the Active Transportation Plan—into one cohesive citywide framework.

# 6.3 Alternatives Considered but Rejected

## 6.3.1 Frontage Road Proposal

On August 8, 2022, City staff presented the concept of frontage roads along the El Camino Real Specific Plan corridor to the El Camino Real Task Force. The proposed frontage road concept included two vehicular travel lanes in each direction, a planted center median with left-turn pockets, and planted medians outside the four primary travel lanes, which would create physically separated frontage roads in each direction. The frontage roads included one vehicular travel lane with Class 3 bicycle sharrows and parallel vehicular parking. Beyond the frontage roads, pedestrian sidewalks were proposed. The frontage road concept would have reduced vehicular speeds and promoted alternate modes of transportation along the corridor.

After deliberation, the Task Force rejected the frontage road concept due to potential transportation impacts to nearby businesses. The Task Force determined that the design would result in a loss of businesses along the corridor. The Task Force unanimously expressed support for the alternative design, similar to the existing conditions along the El Camino Real Corridor. Therefore, the Frontage Road Proposal was not considered.

# 6.4 Alternatives Considered

Given that the Project is composed of numerous improvements throughout the City, it is not reasonable to separately evaluate alternatives to each proposed improvement or corridor. Rather the MEU is evaluated as a package of improvements. The proposed Project represents the high end of the range of improvements (the most amount of change compared to existing conditions), a comprehensive package of enhancements with the most intervention to the roadway system. On the lowest end of the alternative range of mobility improvements (the least amount of change from existing conditions) is the No Project/Adopted Plan Alternative, which represents reasonably foreseeable development if the MEU was not implemented. The Existing Right-of-Way Alternative considered in the EIR represents the middle of the alternative range (a medium level of change from existing conditions) that evaluates a set of moderate mobility improvements representing a relatively low level of intervention to the roadway system.

## 6.4.1 Alternative 1: No Project/Adopted Plan Alternative

As required by Section 15126.6 (e)(3)(B) of the CEQA Guidelines, under the No Project/Adopted Plan Alternative, the MEU would not be adopted, and mobility and circulation in the Planning Area would continue to occur in accordance with the existing Mobility Element. The No Project Alternative allows decision-makers to compare the impacts of approving the proposed Project with the impacts of not approving the proposed Project. The No Project Alternative includes “what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services” (CEQA Section 15126.6 [e][2]).

The San Diego Association of Governments (SANDAG) Regional Plan 2050 forecast was used to create the future baseline environment that represents the No Project Alternative. The baseline year of 2016 was used for existing conditions input data and vehicle miles traveled (VMT) was calculated with the 2050 forecast. The network properties, such as functional classification of roadways, number of lanes, roadway speed, types of median, were checked against and modified to match the currently adopted 1989 Circulation Element and 2021 SANDAG Regional Plan (DS41) before running the 2050 Adopted (Without Project) scenario. The 2050 adopted scenario also included the land use assumptions for the City including the recently adopted Housing Element.

#### 6.4.1.1 Analysis of Alternative 1: No Project/Adopted Plan Alternative

##### Air Quality

Both the Project and the No Project/Adopted Plan Alternative would result in similar construction emissions because both the Project and the alternative include future improvements to the existing circulation network. Similar-scale improvements may be implemented under either; therefore, no substantial reduction in construction emissions would result from implementation of the No Project/Adopted Plan Alternative.

Vehicle traffic is the main source of emissions associated with the buildout of a circulation network. As described in Section 3.6, buildout under the Adopted Plan would result in the same level of VMT as under the MEU (21.6 VMT per capita). One main goal of the MEU is to reduce automobile VMT and related impacts on air quality and congestion by providing time-competitive alternatives to automobile travel, including public transit, cycling, micromobility, walking, and on-demand mobility services. The MEU contains goals and policies to reduce congestion, thereby improving air quality. It is not possible to quantify the complete level of VMT reductions associated with implementation of the MEU at this level of analysis (such as the implementation of microtransit and bike facilities); therefore, the VMT and mobile-source emissions modeling only includes network changes that can be accounted for in the regional traffic model. Thus, it is likely that additional VMT and associated mobile-source emissions reductions would occur under the implementation of the MEU policy framework that would not occur under the no-Project condition. Therefore, the No Project/Adopted Plan Alternative would likely result in greater VMT; therefore, greater operational air quality impacts than the proposed Project.

##### Greenhouse Gas Emissions and Climate Change

As described under Air Quality, both the Project and the No Project/Adopted Plan Alternative would result in similar construction emissions, as both the Project and the alternative include future improvements to the existing circulation network. Similar-scale improvements may be implemented under either; therefore, no substantial reduction in construction emissions would result from implementation of the No Project/Adopted Plan Alternative.

Vehicle traffic is the main source of greenhouse gas (GHG) emissions, associated with the buildout of a circulation network. As described in Section 3.6, buildout under the Adopted Plan would result in the same level of VMT as under the MEU (21.6 VMT per capita). Mobile-source GHG emissions associated with the future year 2050 condition without and with implementation of the Project were calculated. Both future year 2050 conditions would decrease emissions compared to the baseline year 2016 condition.

One main goal of the MEU is to reduce automobile VMT and related impacts on GHG emissions and congestion by providing time-competitive alternatives to automobile travel, including public transit, cycling, micromobility, walking, and on-demand mobility services. The MEU contains goals and policies to reduce congestion, thereby reducing GHG emissions. It is not possible to quantify the complete level of VMT reductions associated with implementation of the MEU at this level of analysis (such as implementation of microtransit and bike facilities); therefore, the VMT and mobile-source GHG emissions modeling only includes network changes that can be accounted for in the regional traffic model. Thus, it is likely that additional VMT and associated mobile-source emissions reductions would occur under the implementation of the MEU policy framework that would not occur under the no-Project condition. Therefore, the No Project/Adopted Plan Alternative would likely result in greater VMT; therefore, greater operational GHG emissions impacts than the Project.

### Noise and Vibration

Both the Project and the No Project/Adopted Plan Alternative would result in similar construction impacts, as both the Project and the alternative include future improvements to the existing circulation network. Similar-scale improvements may be implemented under either and; therefore, no substantial reduction in construction noise impacts would result from implementation of the No Project/Adopted Plan Alternative. Impacts would be similar to the Project.

Table 3.3-10 in Section 3.3, Noise and Vibration, shows a comparison of future year vehicular noise levels under both the MEU and Adopted General Plan (No Project) Alternative. Due to some roadway reclassifications under the MEU, future traffic volumes on circulation network roadways would change. Implementation of the MEU would result in decreased community noise equivalent levels along certain roadway segments as compared to the Adopted General Plan (No Project). Therefore, the No Project/Adopted Plan Alternative would result in incrementally greater operational noise impacts than the Project.

### Land Use and Planning

Under the No Project/Adopted Plan Alternative, buildout would continue as prescribed by the Adopted General Plan. If the Project were not implemented, the Encinitas General Plan would fail to maintain a mobility system that accommodates the City's diverse needs and land uses including planned growth. Furthermore, the adopted Circulation Element would not implement State legislation and Regional Plans to the same extent as the Project. Therefore, the No Project/Adopted Plan Alternative would be less consistent with applicable plans and policies related to mobility. Impacts would be greater under the No Project/Adopted Plan Alternative as compared to the Project.

### Public Services and Facilities

Like the Project, the No Project/Adopted Plan Alternative would provide a policy framework for future mobility projects within the city. This policy document does not induce growth in the city. Because neither the MEU nor the No Project/Adopted Plan Alternative would induce growth or include the construction of new buildings, implementation would not result in an increase in demand for public service facilities, including fire or police protection, or expanded school or park facilities. Furthermore, like the Project, the No Project/Adopted Plan Alternative would not remove or constrict the movement of emergency response vehicles within the city. Therefore, impacts on public services and facilities would be similar under both the Project and the No Project/Adopted Plan Alternative.

### Transportation and Circulation

The current mobility network would lack the updated amenities to properly meet the needs of all users of streets, roads, and highways for safe and convenient travel in a manner that is suitable to the rural, suburban, or urban context of the General Plan (see **Figure 6-1**). Additionally, the VMT per capita in the City is projected to be the same under the buildout of both the adopted and proposed mobility networks, with an estimated 21.6 VMT per capita for both scenarios. In addition, the VMT per capita for the region would also remain the same in both scenarios at 18.5 VMT per capita. Since the VMT per capita with the proposed MEU would not increase above the projected VMT per capita for the existing mobility network, a significant VMT impact would not occur.

As described under Land Use, the Project is proposed to implement various legislative actions and plans including Complete Streets, Senate Bill (SB) 743, San Diego Forward - the Regional Plan, and the City's Climate Action Plan. The Project includes updates to the City's circulation network, along with goals and policies to provide time-competitive alternatives to automobile travel (e.g., public transit, cycling, micromobility, walking, and on-demand mobility services). The adopted network as part of the No Project/Adopted Plan Alternative would not provide the same facilities as the MEU; therefore, would result in greater impacts relative to mobility policy consistency.

## 6.4.2 Alternative 2: Existing Right-of-Way Alternative

The Existing Right-of-Way Alternative would implement mobility improvements identified in the MEU, but to a lesser extent and entirely within the existing public right-of-way. Alternative 2 was selected to provide an alternative with potentially fewer impacts on proximate sensitive receptors due to the reduced extent of construction limits. Long-term, the Existing Right-of-Way Alternative would establish improved mobility for all modes to accommodate the evolving community needs and new regulations in the region, although potentially to a lesser extent than the Project.

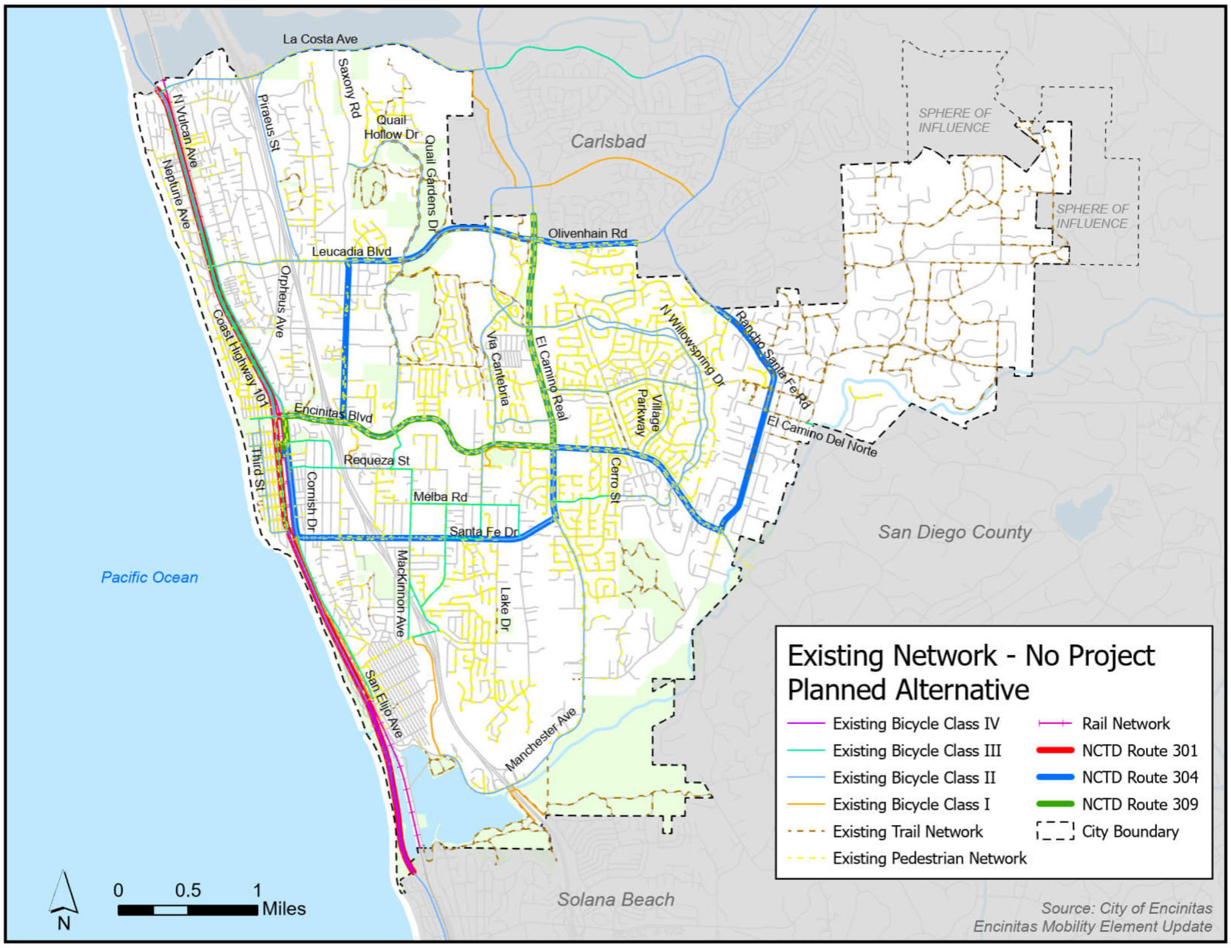
### 6.4.2.1 Analysis of Alternative 2: Existing Right-of-Way (ROW) Alternative

#### Air Quality

Both the Project and the Existing Right-of-Way Alternative would result in similar construction emissions, as both the Project and the alternative include future improvements to the existing circulation network. Similar-scale improvements may be implemented under either; therefore, no substantial reduction in construction emissions would result from the implementation of the Existing ROW Alternative and impacts would be similar.

The Existing ROW Alternative would include the same network as the Project, the only difference would be in the implementation and location or placement of certain facilities. Therefore, at the program level of analysis, it can be assumed that VMT and associated mobile-source emissions would be similar under both the Existing Right-of-Way Alternative and the Project.

## Figure 6-1 Alternative 1 – No Project



### Greenhouse Gas Emissions and Climate Change

Both the Project and the Existing Right-of-Way Alternative would result in similar construction emissions, as both the Project and the alternative include future improvements to the existing circulation network. Similar-scale improvements may be implemented under either; therefore, no substantial reduction in construction emissions would result from the implementation of the Existing Right-of-Way Alternative and impacts would be similar.

The Existing Right-of-Way Alternative would include the same network as the Project, the only difference would be in the implementation and location or placement of certain facilities. Therefore, at the program level of analysis, it can be assumed that VMT and associated mobile-source GHG emissions would be similar under both the Existing Right-of-Way Alternative and the Project.

### Noise and Vibration

Both the Project and the Existing Right-of-Way Alternative would result in similar construction emissions, as both the Project and the alternative include future improvements to the existing circulation network. Similar-scale improvements may be implemented under either; therefore, no substantial reduction in construction emissions would result from implementation of the Existing Right-of-Way Alternative. However, the Existing Right-of-Way Alternative would require that all future improvements prescribed within the MEU be implemented within the existing right-of-way. No roadway widening would occur to construct bike lanes or other mobility-related facilities. Therefore, the limits of construction would be ensured to occur farther away from proximate sensitive receptors. The Existing Right-of-Way Alternative would reduce a potentially significant impact of the Project. Construction noise impacts under the Existing ROW Alternative would be less than those under the Project.

The Existing Right-of-Way Alternative would include the same network as the Project, the only difference would be in the implementation and location or placement of certain facilities. Therefore, at the program level of analysis, it can be assumed that roadway volumes and associated mobile-source noise would be similar under both the Existing Right-of-Way Alternative and the Project.

### Land Use and Planning

Like the Project, the Existing Right-of-Way Alternative would develop and maintain a mobility system that accommodates the City's diverse needs and land uses including planned growth. It would complement regional and state mobility plans and work with the other elements of the Encinitas General Plan, particularly the Land Use Element, to plan for and accommodate the City's mobility needs into the future. Adoption of the Project or the Existing Right-of-Way Alternative would ensure the City's General Plan is consistent with recently adopted regulations that require Mobility Elements to include new policy and analysis per Government Code Section 65032(b). The Existing Right-of-Way Alternative would be consistent with SB 743 specifically by identifying a goal to reduce automobile VMT by providing time-competitive alternatives to automobile travel, including public transportation, bicycling, walking, micromobility, microtransit, and on-demand mobility services. Therefore, land use impacts under the Existing Right-of-Way Alternative would be similar to those of the Project.

### Public Services and Facilities

Like the Project, the Existing Right-of-Way Alternative would provide a policy framework for future mobility projects within the city. This policy document does not induce growth in the city. Because neither the MEU nor the Existing Right-of-Way Alternative would induce growth or include the construction of new buildings, implementation would not result in an increase in demand for public service facilities, including fire or police protection, or expanded school or park facilities. Furthermore, like the Project, the Existing Right-of-Way Alternative would not remove or constrict the movement of emergency response vehicles within the city. Therefore, impacts to public services and facilities would be similar under both the Project and the Existing Right-of-Way Alternative.

### Transportation and Circulation

Like the Project, the Existing Right-of-Way Alternative sets a long-term vision for Encinitas through the establishment of goals, multimodal networks, and supporting policies to accommodate the City's mobility needs into the future. Both the Project and the Existing Right-of-Way Alternative would guide transportation decision-making including plans for diverse modes and mobility options and future mobility improvements. Neither the Project nor the Existing Right-of-Way Alternative would conflict with any adopted transportation policies, plans, and programs including those supporting transit, bicycle, and pedestrian facilities. Proposed changes to the City's existing Circulation Element policies account for VMT thresholds per SB 743 and metrics such as safety, bicycle, and pedestrian level of comfort; and trips-by-mode share.

Like the Project, implementation of the Existing Right-of-Way Alternative would result in less than significant impacts related to VMT because VMT per capita would not increase at buildout compared to buildout of the existing mobility network. As individual development projects in the city are proposed, each individual project would need to ensure VMT is reduced to the extent feasible to support citywide VMT reductions and implementation of the MEU policy framework. Overall, implementation of the Existing Right-of-Way Alternative would be consistent with state, regional, and local policies regarding the transportation system and would support implementation of complete streets, VMT reductions, coastal access, and active transportation. Therefore, impacts on traffic and circulation would be similar under both the Existing Right-of-Way Alternative and the Project.

## 6.5 Environmentally Superior Alternative

Section 15126.6 of the CEQA Guidelines requires an "environmentally superior" alternative to be selected among the alternatives that are evaluated in the EIR. In general, the environmentally superior alternative is the alternative that would be expected to generate the fewest adverse impacts. If the No Project Alternative is identified as environmentally superior, then another environmentally superior alternative shall be identified among the other alternatives.

As described in this chapter, similar to the proposed Project, the alternatives would result in environmental impacts related to air quality, greenhouse gas emissions, noise and vibration, land use and planning, and transportation and circulation. The Project or the alternatives would not result in impacts on public services and facilities. **Table 6-1** presents a comparison of impacts. Although impacts anticipated under the Existing ROW Alternative would be similar to the Project, the alternative would result in an incrementally lower level of effect due to the lower intensity of physical changes and would result in lesser impacts on noise and vibration, than the Project. Therefore, the Existing ROW

Alternative is considered to be the environmentally superior alternative due to a lower level of environmental impact.

**Table 6-1 Comparison of Project Alternatives**

| Environmental Issue | Mitigation Measure | Project Impacts (Direct and Cumulative) | Alternative 1: No Project/ Adopted Plan | Alternative 2: Existing Right-of-Way Alternative |
|---|---|---|---|---|
| Air Quality | None | Less Than Significant Impact | Greater | Similar |
| Greenhouse Gas Emissions and Climate Change | None | Less Than Significant Impact | Greater | Similar |
| Noise and Vibration | None | Less Than Significant Impact | Greater | Less |
| Land Use and Planning | None | Less Than Significant Impact | Greater | Similar |
| Public Services and Utilities | None | Less Than Significant Impact | Similar | Similar |
| Transportation and Circulation | None | Less than Significant Impact | Greater | Similar |