CHAPTER 8
ALTERNATIVES

8.1 INTRODUCTION

The California Environmental Quality Act (CEQA) requires that an environmental impact report (EIR) evaluate a "reasonable" range of alternatives. According to the CEQA Guidelines, 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" (14 CCR 15126.6(a)). Specifically, the CEQA Guidelines require the analysis of the No Project Alternative and alternatives that would be "capable of avoiding or substantially lessening any significant effects of the project" (14 CCR 15126.6(b)). The CEQA Guidelines also require a discussion of why other alternatives were rejected if they were considered in developing the project and still would meet the project objectives. Although an exhaustive analysis is not necessary, an EIR "must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation" (14 CCR 15126.6(a)).

Pursuant to the CEQA Guidelines stated above, a range of alternatives to the proposed project are considered and evaluated in this EIR. These alternatives were developed in the course of project planning, environmental review, public scoping, and public hearings. The discussion in this section provides the following:

1. A description of alternatives considered
2. An analysis of how many objectives of the project each alternative fulfills
3. Per CEQA Guidelines, Section 15126.6(d), a comparative analysis of the project and the alternatives under consideration. Per CEQA Guidelines, Section 15126.6(c), the alternatives are chosen by considering whether they can meet the basic project objectives, their feasibility, and their ability to avoid the project's significant environmental effects

Factors that may be taken into account when addressing the feasibility of alternatives include 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 alternative sites (14 CCR 15126(f)(1)).

A range of alternatives have been considered in an effort to meet most of the basic project objectives. Alternatives that are considered and evaluated in this EIR include:

- Alternative 1 – No Project Alternative
- Alternative 2 – Reduced Coastal Sage Scrub Impacts Alternative

In addition, off-site alternative locations have been considered and eliminated from detailed consideration for the reasons identified in detail in Section 8.5.

8.2 PROJECT SUMMARY

Jenna Development (the applicant) proposes to develop three hotels within the City of Oceanside. Specifically, the approximately 12.5-acre project site spans the City of Oceanside and the City of Carlsbad's jurisdictional boundary. The three hotel structures would range from four to six stories in height. Hotel amenities would include a banquet room, meeting rooms, restaurant and bar, continental breakfast dining area, fitness center, office/internet facilities, spa, pool, fireplace, barbecue, fire pit, and pedestrian trail. The project would incorporate a four-level parking structure, which would be located along the northern boundary of the site, adjacent to State Route 78 (SR-78), and would contain approximately 452 parking spaces. Surface parking would also be provided throughout the project site, amounting to an additional 47 parking spaces.

The project would include 100-foot buffer consisting of a 50-foot biological buffer and a 50-foot planning buffer. Establishment of the buffer would include grading, removal of saline soils, application of soil amendments, and planting of native vegetation (i.e., coastal sage scrub and wetland transitional habitat). There would also be a grasscrete road/trail constructed in this buffer area for fire access, essential flood control maintenance, and passive recreation.

Vehicular access to the project site would be provided via two proposed entry points. The primary point of entry is proposed from a new clear span bridge crossing over Buena Vista Creek at the site's southeast corner to the existing access road for the Westfield Carlsbad Shopping Center. The bridge would have one lane going into the site and two lanes exiting the site and would have a sidewalk on one side with seating areas. A secondary access point to the project would be at the site's western boundary via a driveway (right turn only ingress/egress) to/from Jefferson Street.

8.3 PROJECT OBJECTIVES

The CEQA Guidelines require an EIR to include a statement of objectives sought by the project (14 CCR 15124). This disclosure assists in developing the range of project alternatives to be evaluated in the EIR. The project objectives for this project are listed in Section 3.1, Purpose of the Project and Objectives, of the EIR, and are included here as follows:

1. Provide a hotel establishment that supports 426 hotel rooms.
2. Provide needed business meeting space and suites.
3. Provide lower-cost visitor and recreational facilities per the City of Oceanside's Local Coastal Program Land Use Plan, Recreation, and Visitor Servicing Facilities Policy C.6.

4. Provide a hospitality program in connection with Mira Costa College's Hospitality Management Program, which provides degrees and certificates in hospitality management.
5. Provide infill development on undeveloped land to increase transient occupancy tax revenue for the City of Oceanside.
6. Integrate the project with the character of the surrounding commercial development, resulting in logical, coordinated growth.
7. Provide commercial development along a major roadway with sufficient traffic volume and street availability to enhance the project's economic viability.
8. Create a pedestrian-friendly design that integrates Buena Vista Creek as a primary feature/amenity.
9. Implement a comprehensive native species landscape plan that provides visual continuity throughout the project area and provides a compatible transition from Buena Vista Creek.
10. Provide Native American educational lectures in the project's pavilion.

8.4 SIGNIFICANT IMPACTS

As previously mentioned, an EIR should consider a range of feasible alternatives that would attain most of the project objectives, listed above, while reducing one or more of the significant impacts of the project. As presented in Chapter 4 of this EIR, the proposed project would result in potentially significant impacts to biological resources, air quality, cultural resources, noise, hydrology and water quality, and hazards and hazardous materials, for which mitigation measures have been identified that would reduce impacts to less than significant levels. Impacts resulting from greenhouse gas (GHG) emissions would be significant and unavoidable. The remaining topics evaluated in Chapter 4 would not result in significant impacts. The focus of this alternatives analysis is to identify feasible alternatives that would reduce or avoid the significant impacts of the proposed project.

8.5 ALTERNATIVES ELIMINATED FROM DETAILED CONSIDERATION

The CEQA Guidelines specify that an EIR should (1) identify alternatives that were considered by the lead agency but were eliminated from detailed consideration because they were determined to be infeasible during the scoping process and (2) briefly explain the reasons underlying the lead agency's determination (14 CCR 15126.6(c)). Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are (1) failure to meet most of the basic project objectives, (2) infeasibility, and (3) inability to avoid significant environmental impacts.

Off-Site Alternative Locations

Off-site alternative locations were considered as part of the alternatives process. The key question and first step in analysis of the off-site location "is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location" (14 CCR 15126.6(f)(2)(A)). Furthermore, the CEQA Guidelines state that "an EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative" (14 CCR 15126.6(f)(3)).

It should be noted that the availability of an alternative site does not in and of itself reduce potential impacts. It is expected that developing a similar project could result in a similar array of project impacts and could simply transfer this impact potential to areas surrounding the alternate site location. For this reason, an off-site alternative location would not necessarily be preferred over the proposed project. To meet the objectives of the project, an off-site alternative location would need to be:

- Sufficiently sized to accommodate a viable hotel development
- Located within the coastal area of the City of Oceanside, near the beach, lagoon, harbor, and downtown, and within driving distance of other tourist attractions such as golf courses and LEGOLAND
- Located in an area near existing commercial development
- Located near an aesthetically pleasing natural feature such as a creek, lagoon, or the Pacific Ocean
- Located in an area near existing major roadways with sufficient traffic volumes

The City of Oceanside contains very few similarly sized undeveloped parcels within its jurisdictional boundaries. The applicant does not currently own any similarly sized undeveloped parcels within the City, and the applicant cannot reasonably acquire, control, or otherwise have access to a sufficiently sized alternative site with creek views or other criteria listed above, including compatible zoning within the City of Oceanside. Therefore, off-site alternative locations are not considered feasible and have been eliminated from detailed consideration in this EIR.

Reduced Greenhouse Gas Emissions Alternative

An alternative that would reduce the project's significant GHG emissions was initially considered that would assume a reduced number of hotel rooms. Reducing the number of rooms of the project would reduce the number of vehicle trips generated by this alternative, which would in turn reduce GHG emissions, as well as reducing coarse particulate matter (PM_{10}) emissions. To reduce GHG emissions to below a level of significance, it was

calculated that the elimination of 307 hotel rooms, resulting in a proposed alternative hotel with 119 hotel rooms, would be required. This alternative would not meet project objective 1. Also, the reduction in hotel rooms would result in a financially infeasible project, and was therefore eliminated from further consideration.

8.6 ALTERNATIVES UNDER CONSIDERATION

CEQA Guidelines Section 15126(e) requires that an EIR evaluate a "no project" alternative. The purpose of describing and analyzing a no project alternative is to allow a lead agency to compare the impacts of approving the project to the impacts of not approving it. Specifically, Section 15126.6(e)(3)(B) requires that "If the project is other than a land use or regulatory plan, for example a development project on identifiable property, the "no project" alternative is the circumstance under which the project does not proceed."

8.6.1 Alternative 1: No Project Alternative

The No Project Alternative assumes that the project site would not be developed and that the project site would remain vacant, as in its present condition. The purpose of describing and analyzing a no project alternative is to allow a lead agency to compare the impacts of approving the proposed project with the impacts of not approving the proposed project.

Environmental Analysis

Biological Resources

The results of the biological analysis indicate that potential impacts to vegetation communities, wetland habitat, special-status wildlife, and consistency with the natural habitat plans would occur as a result of implementing the proposed project. The proposed project would result in temporary impacts to wetlands and jurisdictional waters associated with the reconstruction of the outlet and construction of the span bridge, but no long-term significant impacts. Mitigation is incorporated into the project to reduce these potential impacts to less than significant levels. The No Project Alternative would avoid the proposed project's impacts to wetlands and jurisdictional waters.

The biological buffer habitat would continue to be disturbed under this alternative due to the existing on-site easement that allows for ongoing maintenance to the Buena Vista Creek channel to maintain flood flows. The existing easement does not provide a defined access road; therefore, disturbance within the biological buffer area would continue to occur on a larger scale than under the proposed project. The No Project Alternative would not result in the avoidance of impacts to the biological buffer. The No Project alternative would also not provide restoration of the biological buffer area adjacent to the creek. Because there are highly saline soils within the buffer area as a result of the placement of dredge spoils from Buena Vista Lagoon in the 1980s, without the proposed soil removal and amendments, native vegetation would not be able to reestablish naturally.

Air Quality

Because no development would be implemented, no emissions would be generated by the No Project Alternative. The No Project Alternative would avoid the proposed project's air quality impacts associated with site grading, construction, vehicular emissions, and building operations.

Greenhouse Gas Emissions

Because no development would be implemented, no GHG emissions would be generated by the No Project Alternative. The No Project Alternative would avoid the proposed project's GHG impacts associated with site grading, construction, vehicular emissions, and building operations.

Cultural Resources

Under the proposed project, potentially significant impacts may occur from unanticipated discoveries of archaeological and paleontological resources on the project site and the potential discovery of human remains. Potential impacts from the discovery of unknown cultural resources would not occur under the No Project Alternative.

Noise

Under the No Project Alternative, the project site would remain in its undeveloped state. Construction-related noise, project-related traffic, and on-site noise would not result. However, existing noise from SR-78 would continue to occur in excess of existing regulations for wildlife along Buena Vista Creek.

Hydrology and Water Quality

Under the No Project Alternative, site conditions would remain the same as existing conditions, with sparse and disturbed vegetation on site. This alternative would not introduce impervious surfaces and runoff would remain the same as the existing conditions. Impacts to stormwater runoff and pollutant flow off site would be avoided under the No Project Alternative. Water quality impacts from construction and operation would not occur.

Hazards and Hazardous Materials

Under the No Project Alternative, construction of the site would not occur. Therefore, the potential for encountering possibly contaminated soils that may exist due to hazardous materials discharge from upstream properties would be avoided. Impacts to hazards and hazardous materials would not occur.

Project Objectives

The No Project Alternative does not meet any of the objectives set forth in Sections 3.1 and 8.3 of this EIR.

8.6.2 Alternative 2: Reduced Coastal Sage Scrub Impacts Alternative

This alternative would reduce the project site plan in an effort to reduce permanent impacts to sensitive upland vegetation communities located on the project site, namely coastal sage scrub and disturbed coastal sage scrub, as well as reduce other potentially significant impacts. As shown on Figure 4.3-4 in Section 4.3 of this EIR, coastal sage scrub and disturbed coastal sage scrub are located along the northern and western perimeters of the project site, which would be permanently impacted by development of the proposed project. Additional patches of coastal sage scrub and disturbed coastal sage scrub occur closer to Buena Vista Creek within the buffer area and would be temporarily impacted under the proposed project during the removal of saline soils and restoration of coastal sage scrub within the buffer. A reduced site design could be implemented that avoids the coastal sage scrub and disturbed coastal sage scrub on the project site.

In order to avoid these sensitive upland habitats, the hotel development would need to be reduced in size. The three hotel buildings would be reduced in size and reconfigured. The parking structure would be reduced in size when compared to the proposed project to allow the maximum size hotel buildings. The smaller hotel buildings could accommodate a total of 186 rooms, which is a reduction of 240 rooms from the proposed total of 426 rooms. The coastal sage scrub and disturbed coastal sage scrub along the western site boundary would not be avoided under this alternative, because the project's required secondary access would still impact these areas.

Environmental Analysis

Biological Resources

Under the Reduced Coastal Sage Scrub Impacts Alternative, permanent impacts to coastal sage scrub and disturbed coastal sage scrub along the northern site boundary would be avoided because the site plan would be intentionally designed to avoid such impacts. These areas are shown on Figure 4.3-4 in Section 4.3. Permanent impacts to coastal sage scrub and disturbed coastal sage scrub along the western perimeter of the project site would still occur under this alternative, as a result of constructing the required secondary access road. Temporary impacts to the coastal sage scrub and disturbed coastal sage scrub areas found near Buena Vista Creek along the southern part of the project site would not be avoided, and would require the same level of mitigation as afforded under the proposed project. Overall, impacts to coastal sage scrub and disturbed coastal sage scrub would be reduced but not avoided under this alternative. Impacts to biological resources would still be significant and require mitigation.

Air Quality

The Reduced Coastal Sage Scrub Impacts Alternative would result in fewer hotel rooms and therefore fewer vehicles traveling to and from the project site. Accordingly, air quality emissions would be reduced when compared to the proposed project.

Greenhouse Gas Emissions

The Reduced Coastal Sage Scrub Impacts Alternative would result in fewer hotel rooms and therefore fewer vehicles traveling to and from the project site. Accordingly, GHG emissions would be reduced when compared to the proposed project. Impacts would remain significant and unavoidable.

Cultural Resources

Under the proposed project, potentially significant impacts may occur from unanticipated discoveries of archaeological and paleontological resources on the project site and the potential discovery of human remains. Potential impacts from the discovery of unknown cultural resources under the Reduced Coastal Sage Scrub Impacts Alternative would be similar to those under the proposed project.

Noise

The project site would primarily be affected by traffic noise along SR-78 and Jefferson Street. Although smaller than the proposed project's, the parking structure would shield the proposed outdoor use areas and Buena Vista Creek from existing freeway noise. The Reduced Coastal Sage Scrub Impacts Alternative would result in a shorter construction schedule than that of the proposed project. Less construction noise would occur on the project site, and traffic noise impacts would be reduced when compared to the proposed project. However, interior noise impacts at the proposed hotel rooms would likely still be significant and hence would be similar to those under the proposed project.

Hydrology and Water Quality

Under The Reduced Coastal Sage Scrub Impacts Alternative, the same water quality bioretention/biofiltration basins to be implemented under the proposed project would be constructed. Hydrology and water quality impacts would be similar to those resulting under the proposed project, and would be considered less than significant with mitigation incorporated.

Hazards and Hazardous Materials

The site would still undergo excavation under this alternative. As the locations and concentrations of the potentially contaminated soils (resulting from hazardous materials discharge from upstream properties) are not known, it is still possible to encounter hazardous materials during construction. Therefore, this alternative would have similar impacts to hazards and hazardous materials as the proposed project.

Project Objectives

The applicant met with interested agencies and stakeholders over a 5-year period to obtain their ideas and input on the proposed project, including multiple iterations that sought to reduce impacts to sensitive biological resources. Notably, the proposed project evaluated in this EIR is the 26th site plan created for the site, and it has been specifically designed to reduce impacts to sensitive biological resources in the coastal zone. The number of hotel rooms has been reduced numerous times to reduce the project footprint adjacent to Buena Vista Creek. This alternative does not meet the first project objective since it would not result in 426 hotel rooms, but it would meet the remaining project objectives set forth in Sections 3.1 and 8.3 of this EIR.

8.7 SUMMARY MATRIX

Table 8-1 provides a summary of the effects of each alternative for each of the resource topics addressed above.

Table 8-1
Alternatives Summary

Environmental Issue	Proposed Project	Alternative 1: No Project Alternative	Alternative 2: Reduced Coastal Sage Scrub Impacts Alternative
Biological Resources	Impacts would be less than significant with mitigation.	Impacts would be reduced	Impacts would be reduced
Air Quality	Impacts would be less than significant with mitigation.	No impact	Impacts would be reduced
Greenhouse Gas Emissions	Impacts would be significant and unavoidable.	No impact	Impacts would be reduced
Cultural Resources	Impacts would be less than significant with mitigation.	No impact	Similar impacts
Noise	Impacts would be less than significant with mitigation.	No impact	Similar impacts
Hydrology and Water Quality	Impacts would be less than significant with mitigation.	No impact	Similar impacts
Hazards and Hazardous Materials	Impacts would be less than significant with mitigation.	No impact	Similar impacts

Table 8-1
Alternatives Summary

Environmental Issue	Proposed Project	Alternative 1: No Project Alternative	Alternative 2: Reduced Coastal Sage Scrub Impacts Alternative
Meets Most of the Basic Project Objectives?	Yes	No	Yes

8.8 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

As shown in Table 8-1, implementation of the No Project Alternative would result in the greatest reduction in significant impacts when compared to the proposed project. Because the No Project Alternative would result in the least amount of impacts to the environment, it would be the environmentally superior alternative. However, Section 15126.6(e)(2) of the CEQA Guidelines states that if the environmentally superior alternative is the no project alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.

The Reduced Coastal Sage Scrub Impacts Alternative would reduce impacts to sensitive coastal sage scrub upland habitat and slightly reduce impacts to air quality and GHG emissions. As such, it is the environmentally superior alternative.