3.3.25 Alternatives

Introduction

The CEQA Guidelines Section 15126.6 require that an EIR describe and comparatively evaluate a range of alternatives to the proposed project. The lead agency is given substantial latitude in determining the range of “reasonable” alternatives under the general guidance that alternatives must be “feasible” and “shall be selected and described in a manner to foster meaningful public participation and informed decision making.” The analysis of the environmental effects of the alternatives is intended to be less detailed than the analysis of the proposed project and to be primarily comparative.

LRDP EIR

The alternatives in the LRDP EIR must meet the requirements of CEQA and reflect the unique circumstances and impacts related to the scope of the LRDP. Since the scope of the LRDP will reflect the geographic scope of the LRDP, the alternatives should also appropriately reflect the scope of the LRDP. If off-campus development related to campus programs or off-campus activities related to, or caused by, the LRDP (e.g., acquisition or leasing of off-campus space) are analyzed in the LRDP EIR, to the extent that such activities would result in, or contribute to significant impacts, then the alternatives should also address off-campus activities and programs.

If a revision or amendment of the LRDP is intended to accommodate increased enrollment, then it may be appropriate for the alternatives to consider other ways to accommodate the additional students, such as changes in summer versus regular session enrollment, expanded use of off-campus facilities (such as remote instructional centers), or distance learning. However, since CEQA does not require analysis of impacts that involve speculation about future activities, alternatives related to enrollment scenarios should avoid vague descriptions or rely upon uncertain contingencies.

The analysis of alternatives must include the “no project” alternative, however the current CEQA Guidelines provide two objectives for this scenario: 1) the existing conditions at the time the NOP is published (or if no NOP is published, at the time the environmental analysis is commenced); and 2) what would be reasonably expected to occur if the project were not approved, based on current plans and consistent with available infrastructure and services. If the LRDP is being revised or amended, the (Supplemental or Subsequent) EIR should address the dual objectives of the “no project” alternative with two alternatives: a “No Project/No Development” alternative and a “No Project/Development Pursuant to the Adopted Plan” alternative, where the existing LRDP would continue to guide campus development.

Additionally, other alternatives should be considered that 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. The typical range of alternatives would include at least one lower density alternative and other alternatives that modify certain LRDP parameters in order to reduce certain impacts. This could involve one or more “design alternatives,” with one alternative designed to reduce traffic impacts; another to reduce visual impacts, etc. While various modifications could be included in a single alternative, since reducing some impacts may increase others, the use of
single-purpose “design alternatives” may be preferable for clarity of analysis and ease of comprehension.

If included, consideration of alternative sites should focus on reasonable alternatives that have some potential for achieving project objectives. Consideration of incremental campus growth at alternative sites at some distance from the campus would generally not reduce environmental impacts or achieve project objectives. However, if consideration of an off-campus center is included in the LRDP, an analysis of the maximum credible level of growth at more than one location may be useful.

**Project EIR**

As discussed above, an EIR must analyze a reasonable range of alternatives to the proposed project that would attain most of the basic objectives of the project and would reduce or avoid potentially significant impacts. The analysis of alternatives must include a “no project” alternative, which generally reflects the existing conditions at the time the NOP is published. If the LRDP described specific projects, and the currently-proposed project is substantially different than described in the LRDP, then a “Development as Proposed in the LRDP Alternative” should be considered. Alternative configurations, particularly related to avoidance or reduction of potentially significant impacts, and/or alternative sites (which may include off-campus locations) should also be considered. Arbitrary alternatives, such as a percentage increase or decrease in the project scope should be avoided. Figure 9 depicts typical project alternatives.

**Methodology**

The alternatives section should describe the methodology used to develop, screen and select potential alternatives. For any project (particularly LRDPs) a wide variety of alternatives could be considered, however, analysis of every possible alternative or option or combination of options would overburden the EIR with an unnecessary amount of detail that would be redundant and complex, and would therefore fail to provide meaningful information for the public and The Regents to consider in its review of the project.

To determine the alternatives that are analyzed, a list of potential alternatives should be prepared, including alternatives that are suggested in the public scoping process. Each potential alternative should be evaluated to determine whether it would: 1) feasibly attain most of the basic objectives of the project; 2) have the potential to avoid or substantially lessen any of the significant effects of the project; and 3) likely be considered feasible.

Alternatives that may impede to some degree the attainment of project objectives or would be more costly than the proposed project should not be excluded from consideration, as the purpose of the alternatives is to identify ways to mitigate or avoid the significant impact of the project. The potentially significant impacts of the project, prior to mitigation, are those that should be used in determining the alternatives. As discussed in the *CEQA Guidelines Section 15126.6(f)*, a number of factors may be considered in determining which alternatives are feasible. These include, but are not limited to, the following:

- Site suitability;
• Economic viability;
• Availability of infrastructure;
• General Plan consistency;
• Other plans or regulatory limitations;
• Jurisdictional boundaries; and
• Whether the proponent owns or can reasonably acquire, control or otherwise have access to an alternative site.

The EIR should include a discussion of which alternatives were considered, but are not analyzed in the EIR, and should provide an explanation of why those potential alternatives are not analyzed in further detail.

According to the CEQA Guidelines, the analysis of significant effects of alternatives can be evaluated in less detail than the effects of the proposed project. However, the analysis should be detailed enough to provide a factual basis for the report's conclusions about the feasibility of various alternatives. The analysis of the impacts of the alternatives should utilize the same standard of significance used for each environmental topic. Each alternative should be analyzed to determine whether the specific environmental impacts (that have been identified for the project) would be significant for that alternative, prior to mitigation. To the extent relevant, the mitigation measures proposed for the project should then be applied to the impact, and a conclusion reached as to whether the impact would be mitigated to a less than significant level.

**Comparison of the Alternatives**

An EIR must provide a comparative analysis of the alternatives, comparing the impacts of the proposed project to those of each alternative. This analysis should be summarized in a matrix or table, which identifies whether the impacts of the alternatives would be “greater,” “lesser,” or “similar” to the impacts of the project. It may also be useful to prepare a more detailed matrix summarizing the impacts of the project and the alternatives, which would indicate both the conclusion for each impact (significant, less than significant, or no impact) as well as the comparative conclusions noted above. This comprehensive summary is useful for internal review of preliminary copies of draft and final EIRs, in the determination of which alternative or alternatives would be environmentally superior, and the preparation of CEQA Findings.