SECTION 7: ALTERNATIVES TO THE PROJECT

7.1 - Introduction

The Guidelines require Draft EIR to describe a range of alternatives to the proposed project, or to the location of the proposed project, which would feasibly achieve most of the basic project objectives, but would avoid or substantially lessen any of the significant effects identified in the analysis. A Draft EIR is not required to consider every conceivable alternative to a proposed project. Rather, a Draft EIR must consider a reasonable range of alternatives that are potentially feasible; a Draft EIR is not required to consider infeasible alternatives.

Alternatives must be considered even if they would impede, to some degree, the attainment of project objectives or be more costly. The determination of feasibility of project alternatives may include, but not be limited to, factors such as site suitability, economic viability, infrastructure, plan consistency, regulatory and jurisdictional limitations, and control of an alternative site, if applicable.

The analysis contained in this section compares each of the alternatives to the proposed project, and includes an analysis of each alternative with respect to each of the topical environmental issues evaluated for the proposed project. In addition, the analysis of alternatives includes the assumption that all applicable mitigation measures associated with the proposed project would be implemented with an alternative, where applicable. However, applicable mitigation measures may be scaled to reduce or avoid the potential impacts of the alternative under consideration, and may not precisely match those identified for the proposed project.

The analysis in this section is guided by the fact that the Salem Lutheran Church and School is an existing, permitted land use that will remain in operation. The Salem Specific Plan represents a redesign of the existing, onsite uses and does not propose new uses. There will be no changes to the school uses that currently exist. The redesign is intended to accommodate the growing congregation by integrating existing uses with the construction of a new worship center resulting in a site plan with more efficient traffic flow, increased parking, and improved infrastructure. Based on the analysis contained in this section, the Environmentally Superior Alternative is the proposed project because all of the alternatives identified greater impacts when compared to the proposed project.

The alternatives section provides a description of the alternatives (Section 7.2), conclusion summaries of each alternative (Section 7.3), a tabular comparison of alternatives to the proposed project, by topical environmental issue (Section 7.4), and a tabular comparison of alternatives to the proposed project (Section 7.5).

7.2 - Alternatives Identified for Evaluation and Reasons for Including Selected Alternatives

The following three alternatives have been identified for evaluation:

- No Project Alternative - No Development
- Design Review Committee Land Use Plan of May 5, 2006
- Single Access Alternative

Following is a description of each alternative and a discussion of the reasons for including these alternatives.

7.2.1 - No Project Alternative - No Development Alternative

The discussion and evaluation of a No Project Alternative is required by the Guidelines. Therefore, the City has an obligation to comply with the provisions of CEQA by discussing and evaluating this alternative. This alternative provides a comparison between the environmental impacts of the proposed project contrasted with the environmental impacts as if the project were not proposed.

The unique nature of this analysis is that existing church and school uses currently approved and operating on the site are in fact viable and will remain ongoing, in essence the no project alternative. The proposed project that is being submitted by the applicant is merely a redesign of existing uses on the property.

Under this alternative, the project site would remain in its current state and the existing church and school uses currently approved and operating on the site will remain ongoing. The amenities included in the proposed project would not occur. These proposed amenities include the driveway off Santiago Canyon Road, proposed enhancements to Frank Lane, and the increased number of parking spaces when combined provide for a safer and more efficient offsite vehicle access and onsite circulation system. In addition to the circulation amenities, the planting of additional trees would not occur nor would the improved storm water conveyance and water quality system that would reduce offsite flooding and improve water quality. In the “No Project” alternative the Orange Park Boulevard / Frank Lane intersection providing the only access to the site, and the existing uses currently approved and operating on the site will remain ongoing, which include:

- Two classroom buildings (Classroom Buildings B and C) supporting kindergarten through eighth grade and daycare
- A preschool building including pre-kindergarten
- A multipurpose building
- A grass multipurpose field
- 153 paved parking spaces
- Two basketball courts within the main parking lot

- Two playgrounds (within preschool and east of the main parking lot)
- A 180-seat sanctuary building

The "No Project" alternative would result in the negative concerns identified by the neighbors in particular and the community in general would remain. Therefore, concerns identified by the adjacent neighbors in a communiqué to the applicant dated September 22, 2008 (refer to Appendix C.2 of this document), and in subsequent discussions, would not be addressed, including the following:

1. Ingress/egress is needed off of Santiago Canyon Road although constraints were acknowledged. (Note: Linscott, Law and Greenspan's August 20, 2010 "Traffic Impact and Parking Demand Analysis" indicates that approximately 40 percent of church traffic is estimated to use the proposed access off of Santiago Canyon Road, greatly reducing traffic volumes on Frank Lane. During weekday AM peak hours future conditions with the proposed access off of Santiago Canyon Road are expected to result in better levels of service at Orange Park Boulevard/Santiago Canyon Road and Orange Park Boulevard/Frank Lane, greatly reducing traffic volumes using Frank Lane.)
2. Traffic congestion on Orange Park Boulevard during student drop-off and pick-up times and impact to resident's accessibility to their homes.
3. During peak usage Salem Lutheran visitors use both lanes (church and residential) for entry. Residents want unencumbered access on Frank Lane at all times.
4. The existing configuration of Frank Lane results in traffic conflicts at peak usage during school and church activity.

As such, denial of the project resulting in the continuation of the operation of Salem Lutheran Church and School in its current state, as per this alternative, would eliminate the benefit of resolving the following neighbor concerns:

1. Existing configuration of Frank Lane results in traffic conflicts at peak usage during school and church activity.
2. During peak periods Salem visitors utilize both lanes for entry.
3. Neighbors want the right to unencumbered access on Frank Lane at all times.
4. Parents picking up students congest and block Orange Park Boulevard causing residents to wait and sit in backed up traffic as well as neighbors trying to go home along Frank Lane.
5. Salem needs to clear cars parked along their white fence on their driveway before pickup times so parked cars are not blocking the straight away.

6. In order to help parents follow school rules and not use Orange Park Boulevard as a cut-through, have colored placards for Orange Park Acres residents only so they can turn right, and all non-residents have a different colored placard so they will only be able to turn left. Have a crossing guard at the corner directing traffic and monitoring this.
7. Salem needs ingress off Santiago (Canyon Road) although constraints were acknowledged.
8. Light covers not shielded - agreed to shield but no action taken.
9. Salem needs to educate parents, teachers, staff, and children about respecting horses on the street when driving through Orange Park Acres and other traffic rules.
10. Noise from playground is excessive - can be remedied by having adults on the field to supervise children and fewer children at one time on field.
11. No basketball courts closer to homes - Keep activities away, shielded from homes.

Evaluation of the No Project Alternative - No Development will determine if any significant impacts identified with the proposed project would be eliminated or if any less than significant impacts would be further reduced below the level of significance.

7.2.2 - Design Review Committee Land Use Plan of May 5, 2006 Alternative

Salem Lutheran Church and School has been conducting studies and analysis for the redesign of the existing campus and construction of a new worship center for several years in response to the growth of the congregation. A variety of plans have been prepared, analyzing access and internal circulation, parking, the location of the proposed worship center, relocation of the existing preschool to an existing onsite vacant structure, and layout and distribution of the other existing uses. Beginning with an early conceptual plan prepared in September 2004, numerous ongoing studies and analysis have been prepared by architects, civil engineers, traffic engineers, and landscape architects to address and evaluate issues related to the campus redesign.

On May 17, 2006, the City's Design Review Committee (DRC) conducted a preliminary review of a land use plan for the site referenced herein as the DRC Land Use Plan of May 5, 2006. The proposed plan consisted of the following:

- Raze the existing church facilities.
- Develop a new worship center that includes an 11,000 square foot sanctuary with 757 seats.
- Develop 11,000 square feet of offices and classrooms.
- Redesign the parking lots south of the facility and extend the parking lot to provide parking in the western portion of the site behind the existing onsite vacant structure.
- Use the existing grass field for temporary overflow parking.

- Convert the existing onsite vacant structure into a preschool and add a playground with additional hardscaping.
- Retain the shared access from Frank Lane.

A review of the meeting minutes (Appendix C.1) revealed multiple concerns on the DRC Land Use Plan raised by DRC committee members and the public that attended the meeting. These concerns are summarized below.

Aesthetics - Aesthetics concerns related to the height of the proposed worship center to exceed the height of the onsite structure and exceed the allowed height of the City Municipal Code. The proposed worship center's ranch style buildings appears not to match any existing ranch style buildings in the community due to the proposed massive sloping rooflines and high, continuous walls. In addition, the proposed roof coloring was considered inconsistent with the goals and policies of the Orange Park Acres Specific Plan. The proposed redesign would add additional lighting resulting from increased attendance and vehicle lights, event lighting, and security lighting. This additional lighting would conflict with the minimal ambient lighting characteristic of the Orange Park Acres community. The proposed height of the parking lot lighting poles was also a concern. In addition, the existing illuminated monument sign at Orange Park Boulevard and Frank Lane was determined to result in "light trespass" into the residential homes and backyards along Gray Lane. Daytime and nighttime glare reflecting from the proposed glass soundwall was considered a safety problem for drivers.

Hydrology - Hydrology concerns related to the increased surface area, height, and slope of the proposed worship center roof resulting in greater storm water runoff volume and rate onto Santiago Canyon Road.

Land Use - Land use concerns related to moving the preschool from the existing location to the existing onsite vacant structure and the precedent that would be created for similar actions in the Orange Park Acres community. Increasing the classroom space might result in an increase in student population that violates the provisions of the existing conditional use permit.

Noise - Noise concerns related to relocating the parking lot and playground closer to the residential homes and backyards along Gray Lane as a result of the proposed location of the worship center, resulting in noise impacts.

Traffic - Traffic concerns related to the proposed retention of Frank Lane as the only access point that would create traffic conflicts between the residents and church/school traffic. The potential for adequate staff parking was also raised as a concern.

In addition to the concerns raised in the DRC meeting as noted above, a communiqué from adjoining neighbors to the applicant dated September 22, 2008 (refer to Appendix C.2 of this document), and in

subsequent discussions, the following concerns were expressed, which the DRC Land Use Plan did not address:

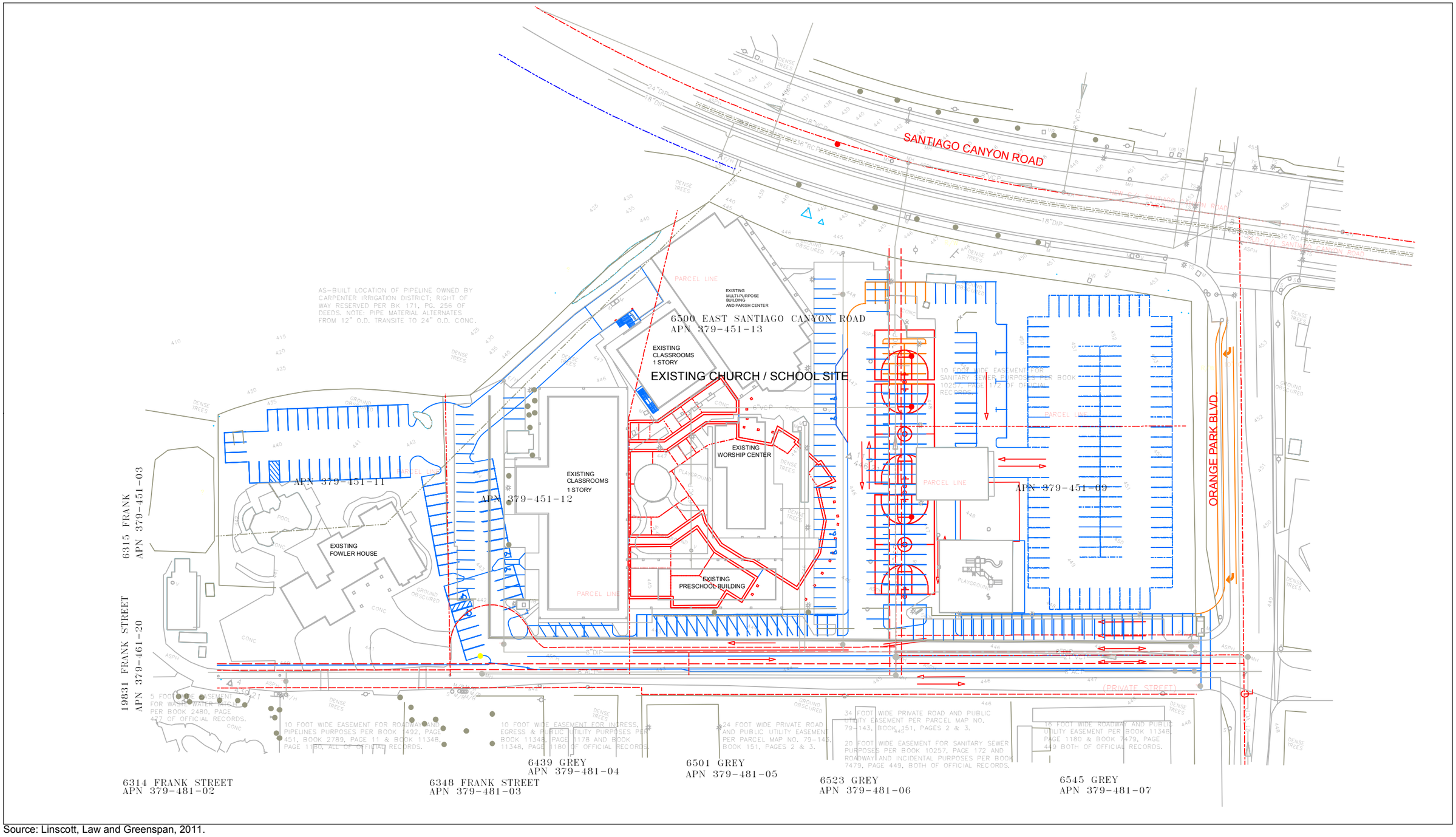
1. The existing configuration of Frank Lane results in traffic conflicts at peak usage during school and church activity.
2. During peak usage Salem Lutheran visitors use both lanes (church and residential) for entry. Residents want unencumbered access on Frank Lane at all times.
3. Traffic congestion on Orange Park Boulevard during student drop-off and pick-up times and impact to resident's accessibility to their homes.
4. Ingress/egress is needed off of Santiago Canyon Road.
5. The location of the proposed worship center closer to Frank Lane.

Evaluation of the Design Review Committee Land Use Plan of May 5, 2006 Alternative considers the proximity of the worship center to Santiago Canyon Road, other land use distribution, and the single vehicle access point requiring all traffic to and from the project site to use the Orange Park Boulevard and Frank Lane intersection.

7.2.3 - Single Access Alternative

The Single Access Alternative eliminates the driveway off Santiago Canyon Road, thus proposing one point of access as per currently approved conditions. As a result of the comments received from the members of the Orange Park Acres (OPA) Board and other community residents this alternative now includes a dedicated right-turn lane into Frank Lane south of Santiago Canyon Road for church and school use (Exhibit 7-1). With the exception of eliminating the proposed driveway off Santiago Canyon Road, this alternative assumes implementation of all of the improvements associated with the proposed project. The proposed uses are the same as the currently approved and existing uses for Salem Lutheran Church and School.

As with the proposed project, all improvements and uses are located in the same general area as the existing conditions with the exception of relocating the existing preschool to an existing vacant onsite structure. In addition to relocating the preschool, improvements would include construction of the new worship center, improvements to Frank Lane to provide physically separated travel lanes for resident-only use and church/school use via a raised median with decorative split rail fence or pavement markers (Botts' Dots) placed on the roadway in the same location, and internal circulation parking improvements.



Source: Linscott, Law and Greenspan, 2011.

Michael Brandman Associates

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Exhibit 7-1
Single Access Alternative

In the neighborhood meetings leading up to the proposed project, a number of concerns were discussed and memorialized in a September 22, 2008 e-mail to the applicant's representative (refer to Appendix C.2 of this document). Neighborhood concerns included the following issues:

1. The existing configuration of Frank Lane results in traffic conflicts at peak usage during school and church activity.
2. During peak usage Salem Lutheran visitors use both lanes (church and residential) for entry. Residents want unencumbered access on Frank Lane at all times.
3. Traffic congestion on Orange Park Boulevard during student drop-off and pick-up times and impact to resident's accessibility to their homes.
4. Ingress/egress is needed off of Santiago Canyon Road.
5. The location of the proposed worship center closer to Frank Lane.

The Single Access Alternative would address most of the concerns raised by the neighbors in the September 22, 2008 e-mail (Appendix C.2). The proposed worship center would be located in the same general area as the existing sanctuary and preschool away from Santiago Canyon Road.

Proposed improvements to Frank Lane would provide Frank Lane resident's unobstructed access to their homes and reflect a condition of two closely spaced but separate driveways, one for church and school use, and one for residents only. A raised median with decorative split rail fence or pavement markers (Botts' Dots) placed on the roadway in the same location would separate the resident lanes (2 lanes) from the church/school lanes (2-4 lanes). A 44-foot wide private drive for Salem Church and School will include 2 to 4 travel lanes with adjoining parking (inbound versus outbound usage of the lanes and allowance for parking depends on the day of the week, time of day, or both). Internal circulation and parking would be improved to allow for more efficient traffic movement during school day drop-off and pick-up periods.

Neighbor concerns pertaining to parking along Frank Lane during school drip-off and pick-up, colored placards to control resident/non-resident turning onto Orange Park Boulevard, light shields, etc., can be addressed in this alternative.

The "Single Access Alternative" does not address the following issue pertaining to Orange Park Boulevard and the need for access off Santiago Canyon Road as stated in the September 22, 2008 e-mail:

- Ingress/egress is needed off Santiago Canyon Road.

For reference, Linscott, Law and Greenspan's August 20, 2010 traffic report entitled "Traffic Impact and Parking Demand Analysis" indicates that approximately 40 percent of church traffic is estimated to use the proposed access off of Santiago Canyon Road, greatly reducing traffic volumes on Frank Lane. During weekday AM peak hours future conditions with the proposed access off of Santiago

Canyon Road are expected to result in better levels of service at the Orange Park Boulevard /Santiago Canyon Road and Orange Park Boulevard/Frank Lane intersections, greatly reducing traffic volumes using Frank Lane. In the absence of the proposed driveway off Santiago Canyon Road, the Single Access Alternative would continue to direct all ingress and egress traffic onto Orange Park Boulevard, Frank Lane, and the associated intersection. The levels of service on weekdays would remain the same as the existing conditions and the level of service on Sundays would remain LOS B or better. Table 7-1 Sunday AM Peak Hour Levels of Service with the dedicated right-turn travel lane.

Evaluation of the Single Access Alternative will determine if any significant impacts identified with the proposed project should be eliminated or if any less than significant impacts would be further reduced below the level of significance.

7.3 - Conclusion Summaries and Environmentally Superior Alternative

The following discussion summarizes each alternative based on the results of Table 7-3 of this section.

No Project - No Development Alternative

The No Project - No Development Alternative would result in greater impacts than the proposed project related to the following six topical environmental issues: Aesthetics, Air Quality, Greenhouse Gas, Hydrology/Water Quality, Transportation/Traffic, and Utilities/Service Systems. No significant and unavoidable impacts are anticipated under this alternative. Additionally, this alternative does not address the concerns identified by the adjacent neighbors in their September 22, 2008 communiqué to the applicant (Appendix C.2) regarding Frank Lane, Orange Park Boulevard and access off of Santiago Canyon Road.

Design Review Committee Land Use Alternative of May 5, 2006

The Design Review Committee Land Use Alternative of May 5, 2006 would result in greater impacts for the following six topical environmental issues: Aesthetics, Air Quality, Greenhouse Gas, Hydrology/Water Quality, Noise, Transportation/Traffic, and Utilities/Service Systems. No significant and unavoidable impacts are anticipated under this alternative. Additionally, this alternative does not address the concerns identified by the adjacent neighbors in a September 22, 2008 e-mail to the applicant's representative as described in section 7.2.3 regarding Orange Park Boulevard and access off of Santiago Canyon Road.

Single Access Alternative

The Single Access Alternative would result in greater impacts for the following four topical environmental issues: Air Quality, Greenhouse Gas, Noise, and Transportation/Traffic. No significant and unavoidable impacts are anticipated under this alternative. Additionally, this alternative does not address the concerns identified by the adjacent neighbors in a September 22,

2008 e-mail to the applicant's representative as describe in section 7.2.3 regarding Orange Park Boulevard and access off of Santiago Canyon Road.

Environmentally Superior Alternative

Based on the analysis contained in this section, the Environmentally Superior Alternative is the proposed project because all of the alternatives identified greater impacts when compared to the proposed project.

Table 7-1: Sunday AM Existing Plus Project Intersection Peak Hour Levels of Service

Key Intersection	Peak Hour	Year 2010 Existing		Year 2010 Existing + Project							
				400-Person Attendance (85th percentile)		556-Person Attendance (90th percentile)		660-Person Attendance (prior data)		712-Person Attendance (95th percentile)	
		ICU or Average Delay (sec/veh)	LOS	ICU or Average Delay (sec/veh)	LOS	ICU or Average Delay (sec/veh)	LOS	ICU or Average Delay (sec/veh)	LOS	ICU or Average Delay (sec/veh)	LOS
Orange Park Blvd at Santiago Canyon Rd	Sunday AM	0.326	A	0.344	A	0.374	A	0.394	A	0.403	A
Orange Park Blvd at Church Driveway-Frank Lane	Sunday AM	9.8	A	10.6	B	11.6	B	12.4	B	12.9	B

Notes:
The proposed project condition represents a 712-person attendance.
Source: Linscott Law & Greenspan, November 2011.

7.4 - Project Alternative Comparison

Table 7-2 below compares the impacts of the proposed project to each alternative arranged by topical environmental issue. Following this table, Table 7-3 summarizes the results of Table 7-2.

Table 7-2: Alternative Impact Comparison by Topical Environmental Issue

Alternative	Comparison
Aesthetics	
Proposed Project	Under the proposed project, the features incorporated into the project design do not result in aesthetic impacts related to visual characteristics and new sources of light and glare to a less than significant level during the long-term operational phase. Negative aesthetic elements associated with the construction phase are temporary in nature, would be removed after construction and result in less than significant impacts. Implementation of the proposed project would not result in significant and unavoidable impacts related to the Aesthetics topical environmental issue. Summary: Under the proposed project, all potentially significant impacts were determined to be less than significant and do not require mitigation measures.
No Project - No Development	The No Project - No Development Alternative would result in greater impacts compared to the proposed project because the redesign provides for a more efficient and aesthetically balanced site design that would enhance the visual character of the site. The additional trees and Frank Lane enhancements would provide a better integration with the surrounding visual characteristics of the Orange Park Acres community. No impacts would result during the construction period because no construction activities are proposed. Conclusion: Impacts would be greater under the No Project - No Development Alternative.
Design Review Committee Land Use Plan of May 5, 2006	The Design Review Committee Land Use Plan of May 5, 2006 Alternative would result in greater impacts because the proposed worship center would be placed nearly adjacent to Santiago Canyon Road and close to Orange Park Boulevard resulting in greater building "massing" and visual impacts. Negative aesthetic elements associated with the construction phase are temporary in nature, would be removed after construction and result in less than significant impacts. Conclusion: Impacts would be greater under the Design Review Committee Land Use Plan of May 5, 2006 Alternative.
Single Access Alternative	Under the Single Access Alternative, the proposed driveway off Santiago Canyon Road would not be constructed; all other components of the proposed project would be implemented. Impacts to Aesthetics would be nearly identical to the proposed project Negative aesthetic elements associated with the construction phase are temporary in nature, would be removed after construction and result in less than significant impacts. Conclusion: Impacts would be similar under the Single Access Alternative.

Table 7-2 (cont.): Alternative Impact Comparison by Topical Environmental Issue

Alternative	Comparison
Air Quality	
Proposed Project	Under the proposed project, potential air quality impacts during the short-term construction phase of the proposed project related to site clearing, grading, and infrastructure installation would result. Potential long-term operational impacts relate to the proposed redesign, considered stationary sources, and vehicle trips. Implementation of the proposed project would not result in significant and unavoidable impacts related to the Air Quality topical environmental issue. Summary: Under the proposed project, all of the impacts were determined to less than significant and do not require mitigation.
No Project - No Development Alternative	Under the No Project - No Development Alternative, air quality emissions would increase during the long-term operational phase compared to the proposed project because site access improvements (i.e. the addition of an access point off of Santiago Canyon Road) would not be made and the additional parking spaces would net be created. This would result in more vehicle queuing at the Orange Park Boulevard/Frank Lane intersection and idling from inefficient onsite vehicle circulation. Under this alternative, potential air quality impacts would be less than the proposed project during the short-term construction period because no construction activities would occur. Conclusion: Impacts would be greater under the No Project - No Development Alternative during the long-term operational phase.
Design Review Committee Land Use Plan of May 5, 2006	Under the Design Review Committee Land Use Plan of May 5, 2006 Alternative, air quality emissions would be slightly worse compared to the proposed project because more vehicle queuing and idling would occur, which would slightly increase emissions. Air quality impacts during the short-term construction period would be similar to the proposed project. Conclusion: Impacts would be greater under the Design Review Committee Land Use Plan of May 5, 2006 Alternative.
Single Access Alternative	Under the Single Access Alternative, air quality emissions would increase compared to the proposed project due to increased vehicle queuing and idling as all vehicular traffic would be via the Orange Park Boulevard/Frank Lane intersection. In addition, onsite circulation would be less efficient than the proposed project resulting in increased emissions. Air quality impacts during the short-term construction period would be similar to the proposed project. Conclusion: Impacts would be greater under the Single Access Alternative.

Table 7-2 (cont.): Alternative Impact Comparison by Topical Environmental Issue

Alternative	Comparison
Greenhouse Gas Emissions	
Proposed Project	Under the proposed project, potential greenhouse gas impacts during the short-term construction phase of the proposed project related to site building demolition, clearing, grading, asphalt paving, building construction and architectural coating, and infrastructure installation would result. Potential long-term operational impacts relate to motor vehicle trips, electricity usage, and refrigerants. Impacts related to greenhouse gas emissions effecting global climate change were evaluated and determined to be too speculative to quantify and are considered to be *de minimis* on a global scale. The City's Interim Guidance for Greenhouse Gas Analysis uses a threshold of 10,000 metric tons per year of CO_2 to determine the significance of an individual project's contribution to GHG emissions. The City's guidance states that if an individual project generates GHG emissions below this threshold, it is acceptable to conclude that GHG emissions are generated, but do not result in a cumulative considerable contribution to GHGs or global warming. Design features incorporated into the proposed project and retention of existing features adjacent to the project site do not result in potential conflicts with existing greenhouse gas plans and policies. Implementation of the proposed project would not result in significant and unavoidable impacts related to the Greenhouse Gas topical environmental issue. Summary: Under the proposed project, all of the impacts were determined to be less than significant and did not require mitigation.
No Project - No Development Alternative	Under the No Project - No Development Alternative, impacts related to greenhouse gas emissions would be less than the proposed project because no site improvements or construction of additional development would occur during the short-term construction phase. Under this alternative, potential impacts to greenhouse gas emissions during the long-term operational phase would be greater because none of the proposed features incorporated into the project would be implemented. Under this alternative, potential greenhouse gas impacts would be less than the proposed project during the short-term construction period because no construction activities would occur. Conclusion: Impacts would be greater under the No Project - No Development Alternative during the long-term operational phase.
Design Review Committee Land Use Plan of May 5, 2006	Under the Design Review Committee Land Use Plan of May 5, 2006 Alternative, impacts related to green house gas would be greater than the proposed project because of the additional vehicle queuing and associated increase emissions from the proposed project Greenhouse gas impacts during the short-term construction period would be similar to the proposed project. Conclusion: Impacts would be greater during the long-term operational period under the Design Review Committee Land Use Plan of May 5, 2006 Alternative.

Table 7-2 (cont.): Alternative Impact Comparison by Topical Environmental Issue

Alternative	Comparison
Single Access Alternative	Under the Single Access Alternative, impacts related to greenhouse gas would increase when compared to the proposed project because of the increased vehicle emissions resulting from additional vehicle idling and a less efficient internal vehicle circulation system. Greenhouse gas impacts during the short-term construction period would be similar to the proposed project. Conclusion: Impacts would be greater during the long-term operational period under the Single Access Alternative.
Hazards and Hazardous Materials	
Proposed Project	Under the proposed project, potential impacts would be related to the use and storage of small quantities of potentially hazardous materials in the form of cleaning solvents and pesticides during the long-term operational phase and construction materials during the short-term construction period. However, such materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Potential impacts were also related to the potential impacts from wildland fire exposure. Implementation of the proposed project would not result in significant and unavoidable impacts related to the Hazards and Hazardous Materials topical environmental issue. Summary: Under the proposed project, all potentially significant impacts were determined to be less than significant and did not require mitigation.
No Project - No Development Alternative	Under the No Project - No Development Alternative, potentially hazardous materials that would be used during the construction phase of the proposed project (such as vehicle fuels, oils, and transmission fluids) would not be brought on site because no construction would occur. During the long-term operational phase, similar household hazardous wastes would be used. Exposure of persons or structures from wildland fires would also be similar. Conclusion: Impacts would be less under the No Project - No Development Alternative during the short-term construction phase but similar during the long-term operational phase.
Design Review Committee Land Use Plan of May 5, 2006	Under the Design Review Committee Land Use Plan of May 5, 2006 Alternative, the same mandatory requirements regarding the use and storage of potentially hazardous cleaning materials and pesticides would be required. In addition, the risk of exposure from wildland fires would not be different. Quantities of hazardous materials similar to the proposed project would be used during the construction phase. Conclusion: Impacts would be similar under Design Review Committee Land Use Plan of May 5, 2006 Alternative.

Table 7-2 (cont.): Alternative Impact Comparison by Topical Environmental Issue

Alternative	Comparison
Single Access Alternative	Under the Single Access Alternative, the same mandatory requirements regarding the use and storage of potentially hazardous cleaning materials and pesticides would be required. In addition, the risk of exposure from wildland fires would be the same. Quantities of hazardous materials similar to the proposed project would be used during the construction phase. Conclusion: Impacts would be similar under the Single Access Alternative.
Hydrology and Water Quality	
Proposed Project	Under the proposed project, a new integrated storm water conveyance and water quality system would be installed and integrated into the site development. With the proposed project, runoff rates will remain similar to the existing conditions (within 5%) and the onsite drainage pattern will be slightly altered to reduce localized flooding of Frank Lane. Under the proposed conditions, the majority of the site drainage (approximately 5.6 acres), will be directed towards E. Santiago Canyon Road to reduce flooding along Frank Lane. The new system would maintain existing volumes and rates of stormwater into Handy Creek and provide onsite water quality treatment via treatment mechanisms such as infiltration structure, pervious pavement, permeable pavement, and porous landscaping. The proposed project includes Low Impact Development (LID) features such as bioretention without underdrains, porous landscaping, subsurface infiltration galleries, permeable asphalt, permeable concrete, and permeable concrete pavers, which will reduce run-off and aid with water quality during the long-term operational phase. Additionally, the proposed project is classified as a Priority Project, and as such, the project's BMPs shall be focused on infiltration, harvest, and evapotransiration in an effort to reduce, minimize, and eliminate pollutants. Preparation of a mandatory Storm Water Pollution Prevention Plan would address potential hydrology and water quality impacts during the short-term construction period. Implementation of the proposed project would not result in significant and unavoidable impacts related to the Hydrology and Water Quality topical environmental issue. Summary: Under the proposed project, all of the impacts are less than significant and did not require mitigation.
No Project - No Development Alternative	Under the No Project - No Development Alternative, the project site would continue to convey untreated storm water directly from the project site into Handy Creek via private properties to the west of the site. In addition, under this alternative the minor offsite flooding on properties to the west of the site would continue. No short-term impacts to hydrology and water quality because no development activities are proposed. Conclusion: Impacts would be greater under the No Project - No Development Alternative.

Table 7-2 (cont.): Alternative Impact Comparison by Topical Environmental Issue

Alternative	Comparison
Design Review Committee Land Use Plan of May 5, 2006	Under the Design Review Committee Land Use Plan of May 5, 2006 Alternative, the installation of an onsite storm water conveyance system and water quality system similar to that of the proposed project would be constructed. Similar to the proposed project, storm water would be collected and infiltrated onsite and conveyed offsite into Handy Creek. Similar to the proposed project, a Storm Water Pollutant Prevention Plan would be implemented during the construction phase. Conclusion: Impacts would be greater under the Design Review Committee Land Use Plan of May 5, 2006 Alternative during the long-term operational period.
Single Access Alternative	Under the Single Access Alternative, the installation of an onsite storm water conveyance system and water quality system similar to that of the proposed project would likely be constructed. Similar to the proposed project, storm water would be collected and infiltrated onsite and conveyed offsite into Handy Creek. Similar to the proposed project, a Storm Water Pollutant Prevention Plan would be implemented during the construction phase. Conclusion: Impacts would be similar under the Single Access Alternative during the long-term operational period.
Land Use and Planning	
Proposed Project	The Orange Park Acres Specific Plan (OPASP) designates the site as Public & Quasi-Public and the City General Plan Land Use Element designates the site Estate Low Density Residential. The proposed project is consistent with all the applicable policies in every element of the City's General Plan, as well as the OPASP and the City Master Plan of Recreational Trails. The project proposes a Specific Plan and change of zone to SP-PI (Specific Plan/Public Institutional). The proposed project provides the same existing permitted uses currently approved on the site. No new uses are proposed. Upon adoption of the specific plan and zone change, the proposed would continue to be consistent with the City Zoning Code during the long-term operational phase. Potential significant impacts during the short-term construction phase would not occur. Implementation of the proposed project would not result in significant and unavoidable impacts related to the Land Use and Planning topical environmental issue. Summary: Under the proposed project, all of the impacts were determined to be less than significant and do not require mitigation.
No Project - No Development Alternative	Under the No Project - No Development Alternative, the existing land uses would remain consistent with the existing City General Plan land use designation and associated zoning classification, and OPASP land use designation. No changes in zoning classifications or land use designations are required for the construction phase. Conclusion: Impacts would be similar under the No Project - No Development Alternative.

Table 7-2 (cont.): Alternative Impact Comparison by Topical Environmental Issue

Alternative	Comparison
Design Review Committee Land Use Plan of May 5, 2006	Under the Design Review Committee Land Use Plan of May 5, 2006 Alternative, the worship center would be located closer to Santiago Canyon Road and Orange Park Boulevard. This has no bearing on land use and planning and the project's consistency regarding land use and planning would be the same as with the proposed project. No changes in zoning classifications or land use designations are required for the construction phase. Conclusion: Impacts would be similar under the Design Review Committee Land Use Plan of May 5, 2006 Alternative.
Single Access Alternative	Under the Single Access Alternative, the proposed improvements to Frank Lane associated with the proposed project would remain. However, the proposed driveway off Santiago Canyon Road would not be constructed. This has no bearing on land use and planning and the project's consistency regarding land use and planning. No changes in zoning classifications or land use designations are required for the construction phase. Conclusion: Impacts would be similar under the Single Access Alternative.
Noise	
Proposed Project	Under the proposed project, the redesign of the existing church and school facility would result in the introduction of noise associated with temporary construction activities and the long-term operation of the expanded sanctuary and redesigned site plan. Implementation of the proposed project would not result in significant and unavoidable impacts related to this topical environmental issue. Summary: Under the proposed project, all of the impacts were determined to be either less than significant before mitigation or would result in less than significant impacts after implementation of the recommended mitigation measures.
No Project - No Development Alternative	Under the No Project - No Development Alternative, the noise associated with the existing activities would continue; however, because the sanctuary would not be expanded and the preschool not relocated and thus, would not have an increased capacity, noise levels are anticipated to be slightly less. However, under this alternative, the proposed driveway off Santiago Canyon Road, improvements to Frank Lane and onsite circulation and parking improvements would not occur thereby continuing the existing noise levels associate with vehicular activity during the long-term operational phase. Because no development is proposed, no short-term construction noise impacts would result. Conclusion: Impacts would be similar under the No Project - No Development.
Design Review Committee Land Use Plan of May 5, 2006	Under the Design Review Committee Land Use Plan of May 5, 2006 Alternative, greater noise related impacts than the proposed project would result because the traffic flow to and from the site would only be via the Frank Lane and Orange Park Boulevard intersections. Whereas, under the proposed project, the access point from Santiago Canyon Road

Table 7-2 (cont.): Alternative Impact Comparison by Topical Environmental Issue

Alternative	Comparison
	would decrease the amount of traffic at the Orange Park Boulevard and Frank Lane intersections, which are closest to the nearby residential and uses. In addition, the arrangement of the existing Multipurpose Building and Classroom Buildings B and C and proposed worship center would reflect and concentrate noise generated on the basketball and play areas adjacent to Frank Lane and direct that sound to the residential uses south of Frank Lane. Potential noise impacts from construction activities associated with the proposed project would be greater that this alternative but would cease after construction is completed. Conclusion: Impacts would be greater under the Design Review Committee Land Use Plan of May 5, 2006 Alternative.
Single Access Alternative	Under the Single Access Alternative the proposed driveway off Santiago Canyon Road would not be constructed resulting in all vehicular traffic using Frank Lane. In addition, the single access point would decrease onsite circulation efficiency. Together this would result in an increase in noise levels above that of the proposed project. Potential noise impacts from construction activities associated with the proposed project would be greater that this alternative but would cease after construction is completed. Conclusion: Impacts would be greater under the Single Access Alternative.
Transportation and Traffic	
Proposed Project	Under the proposed project, a driveway off Santiago Canyon Road would be added and improvements would be made to Frank Lane, which would separate the church/school traffic from the residential traffic during the long-term operational phase. This redesign of the project site would improve traffic flow on site and will result in a decrease in traffic congestion at the Orange Park Boulevard and Frank Lane intersection. Traffic associated with the short-term construction period would not result in traffic disruptions. Implementation of the proposed project would not result in significant and unavoidable impacts related to the Transportation and Traffic topical environmental issue. Summary: Under the proposed project, all of the impacts were determined to less than significant and did not require mitigation.
No Project - No Development Alternative	Under the No Project - No Development Alternative, the existing traffic congestion would not be alleviated at the Orange Park Boulevard/Frank Lane intersection and onsite circulation would continue to be congested and residential versus church/school traffic conflicts would continue. No construction related traffic impacts would occur because development is not proposed. Conclusion: Impacts would be greater under the No Project - No Development Alternative.

Table 7-2 (cont.): Alternative Impact Comparison by Topical Environmental Issue

Alternative	Comparison
Design Review Committee Land Use Plan of May 5, 2006	Under the Design Review Committee Land Use Plan of May 5, 2006 Alternative, the existing site entrance from Frank Lane would be retained but improved with two closely spaced but separate driveways and raised median and fence providing resident lanes (2 lanes) and church/school lanes (2-4 lanes). In addition, the single access point would decrease onsite circulation efficiency. However, the proposed driveway access off Santiago Canyon Road would not be constructed resulting in greater impacts (i.e., reduced levels of service) at both the Orange Park Boulevard/Frank Lane and Orange Park Boulevard/Santiago Canyon Road intersections. Traffic impacts would also be greater under this alternative during the construction period due to construction vehicles also using the single access point resulting in construction vehicle conflicts with church/school vehicles, and vehicles accessing the residences south and west of the site. Conclusion: Impacts would be greater under the Design Review Committee Land Use Plan of May 5, 2006 Alternative for both the construction period and long-term operational phase.
Single Access Alternative	Under the Single Access Alternative the proposed driveway off Santiago Canyon Road would not be constructed resulting in all vehicular traffic using Frank Lane, In addition, the single access point would decrease onsite circulation efficiency. Together this would result in an increase in vehicle congestion above that of the proposed project constructed resulting in greater impacts (i.e., reduced levels of service) at both the Orange Park Boulevard/Frank Lane and Orange Park Boulevard/Santiago Canyon Road intersections.. Traffic impacts would also be greater under this alternative during the construction period due to construction vehicles also using the single access point resulting in construction vehicle conflicts with church/school vehicles, and vehicles accessing the residences south and west of the site. Conclusion: Impacts would be greater under the Single Access Alternative for both the construction period and long-term operational phase.
Utilities and Service Systems	
Proposed Project	Under the proposed project, a new integrated storm water conveyance and water quality system would be installed and integrated into the site development thereby reducing storm water discharge volume and rate into Handy Creek and provide onsite water quality treatment. The proposed project includes Low Impact Development (LID) features such as permeable pavements, the turfed parking/multipurpose field, and water-conserving landscapes will reduce run-off and aid with water quality during the long-term operational phase. Wastewater service and water supply infrastructure would continue to serve the site as before. Implementation of the proposed project would not result in significant and unavoidable impacts related to the Utilities and Service Systems topical environmental issue. Summary: Under the proposed project, all of the impacts were determined to less than significant and did not require mitigation.

Table 7-2 (cont.): Alternative Impact Comparison by Topical Environmental Issue

Alternative	Comparison
No Project - No Development Alternative	Under the No Project - No Development Alternative, storm water flows would continue to discharge offsite to the west onto adjacent properties and the occasional flooding would not be eliminated. Under this alternative, potentially significant impacts related to water and wastewater treatment capacity and conveyance facilities would be greater to the proposed project. Because no development is proposed, no short-term construction impacts to utilities and service systems would result. Conclusion: Impacts would be greater under the No Project - No Development Alternative.
Design Review Committee Land Use Plan of May 5, 2006	Under the Design Review Committee Land Use Plan of May 5, 2006 Alternative, all of the proposed uses would be the same except the proposed driveway off Santiago Canyon Road. Impacts would be similar to the proposed project during the construction period. Conclusion: Impacts would be similar under the Design Review Committee Land Use Plan of May 5, 2006 Alternative.
Single Access Alternative	Under the Single Access Alternative, all of the proposed uses would be the same except the proposed driveway off Santiago Canyon Road. Impacts would be similar to the proposed project during the construction period. Impacts would be similar under the Single Access Alternative.

Table 7-3 below summarizes Table 7-2 by providing a side-by-side comparison of the impact significance level of the proposed project with the impact significance level of each alternative according to the following two levels of analysis.

Level 1 This comparison level assumes the post-mitigation condition of the proposed project and the same feasible mitigation measures and project requirements are available and able to be implemented for each alternative.

Level 2 The comparison rating level assigns a Less, Same, or Greater impact significance rating. The Level 2 rating indicates that, although the alternative also has less than significant impacts, when compared relatively to the proposed project, impacts are deemed to be less than the proposed project (Less), approximately the same as the proposed project (Similar), or Greater than the proposed project (Greater).

Refer to Section 4 of this Draft EIR for a detailed discussion of each topical environmental issue.

Table 7-3: Impact Summary Comparison of Project Alternatives

Topical Environmental Issue	Proposed Project	Alternatives					
		No Project - No Development		Design Review Committee Land Use Plan of May 5, 2006		Single Access Alternative	
		Level 1	Level 2	Level 1	Level 2	Level 1	Level 2
Aesthetics	LTS	LTS	Greater	LTS	Greater	LTS	Similar
Air Quality	LTS	LTS	Greater	LTS	Greater	LTS	Greater
Greenhouse Gas Emissions	LTS	LTS	Greater	LTS	Greater	LTS	Greater
Hazards and Hazardous Materials	LTS	LTS	Less	LTS	Similar	LTS	Similar
Hydrology and Water Quality	LTS	LTS	Greater	LTS	Greater	LTS	Similar
Land Use and Planning	LTS	LTS	Similar	LTS	Similar	LTS	Similar
Noise	LTS-M	LTS	Similar	LTS	Greater	LTS	Greater
Transportation and Traffic	LTS	LTS	Greater	LTS	Greater	LTS	Greater
Utilities and Service Systems	LTS	LTS	Greater	LTS	Similar	LTS	Similar

Abbreviations:
LTS = Less Than Significant LTS-M = Less Than Significant with Mitigation
Source: Michael Brandman Associates, June 2011.

7.5 - Project Objective Feasibility Summary

A project alternative must be able to feasibly attain most of the objectives of the proposed project. Table 7-4 provides this feasibility by comparing each alternative to each objective and stating whether any of the three alternatives would or would not attain the basic objectives identified in Section 3.3, Project Description. For clarity and ease of reference, the objectives are repeated in this table.

Table 7-4: Project Objective Feasibility Comparison

Project Objective	Project Alternatives		
	No Project - No Development	Design Review Committee Land Use Plan of May 5, 2006	Single Access Alternative
OBJ-1. Attain the most suitable land use pattern for the campus with a functional and aesthetic relationship of facilities while being responsive to the concerns and wishes expressed by surrounding residences and the City of Orange.	No	No	No
OBJ-2. Ensure the quality appearance for Salem Church Campus with consistent design and visual improvements blending proposed facilities with existing facilities, thus continuing the visual character and appeal of the existing facility.	No	No	Yes

Table 7-4 (cont.): Project Objective Feasibility Comparison

Project Objective	Project Alternatives		
	No Project - No Development	Design Review Committee Land Use Plan of May 5, 2006	Single Access Alternative
OBJ-3. Have an efficient internal circulation system to alleviate unnecessary project-related traffic overflow onto adjacent streets while ensuring the functional access and parking needs of the campus.	No	No	No
OBJ-4. Maintain comparable onsite open space and recreational amenities of the campus while meeting the programmatic needs.	No	Yes	Yes
OBJ-5. Provide a comprehensive, well-rounded master plan for the property that addresses environmental, water quality, drainage, circulation and public facilities and services.	No	No	No
OBJ-6. Create a water quality and drainage system that minimizes the impact to offsite receiving waters and ensures that runoff from smaller events is infiltrated or otherwise addressed as applicable, before entering Handy Creek and Santiago Creek.	No	Yes	Yes
OBJ-7. Incorporate sustainable design techniques into the redesign plans for the campus.	No	No	Yes

Notes:
Yes = the alternative would attain the objective. No = the alternative would not attain the objective.
Source: Michael Brandman Associates, June 2011.