

7. Alternatives to the Proposed Project

7.1 INTRODUCTION

As described in Section 1.2.1, *Type and Purpose of this Draft EIR*, this EIR has been prepared as a Supplemental EIR to the 2006 General Plan EIR certified in July 25, 2006. Pursuant to CEQA Section 15163 (b), “the supplement to the EIR need contain only the information necessary to make the previous EIR adequate for the project as revised.” There is no mandate to include project alternatives in a Supplemental EIR. The 2006 General Plan EIR included the evaluation of a range of alternatives selected for their potential to avoid or lessen environmental impacts of the 2006 General Plan. Although not required for a Supplemental EIR, in light of the impacts identified in this Draft SEIR for the proposed General Plan LUE Amendment in comparison to the existing 2006 General Plan, the City has elected to prepare an alternatives analysis. The following sections review the purpose and scope of project alternatives, the project objectives, and the significant impacts of the General Plan LUE Amendment.

7.1.1 Purpose and Scope

CEQA Requirements

The California Environmental Quality Act (CEQA) requires that an Environmental Impact Report (EIR) include a discussion of reasonable project alternatives that would “feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any significant effects of the project, and evaluate the comparative merits of the alternatives” (CEQA Guidelines Section 15126.6). This chapter identifies potential alternatives to the proposed project and evaluates them, as required by CEQA.

Key provisions of the CEQA Guidelines on alternatives (Section 15126.6[a] through [f]) are summarized below to explain the foundation and legal requirements for the alternatives analysis in this DSEIR.

- “The discussion of alternatives shall focus on alternatives to the project or its location which 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” (15126.6[b]).
- “The specific alternative of ‘no project’ shall also be evaluated along with its impact” (15126.6[e][1]).
- “The no project analysis shall discuss the existing conditions at the time the Notice of Preparation (NOP) is published, and at the time the environmental analysis is commenced, 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 environmentally

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superior alternative is the ‘no project’ alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives” (15126.6[e][2]).

- “The range of alternatives required in an EIR is governed by a ‘rule of reason’ that requires the EIR to set forth 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 the project” (15126.6[f]).
- “Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent)” (15126.6[f][1]).
- “For alternative locations, “only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR” (15126.6[f][2][A]).
- “An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative” (15126.6[f][3]).

Alternative Location

An evaluation of an alternative to the project location is appropriate for a site-specific development project. This Supplemental DEIR is prepared for a General Plan LUE Amendment that applies to the entire City of Newport Beach. An “alternative location” to the City is not a feasible alternative. However, the land use alternative evaluated in this chapter (No Airport Area Changes) does evaluate an alternative that eliminates development within one of the subareas of the City.

Definition of No Project Alternative

As noted above, the No Project alternative shall discuss “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.” Pursuant to CEQA Guidelines Section 15126.6(e)(c)(A), “When the project is the revision of an existing land use or regulatory plan, policy or ongoing operation, the “no project” alternative will be the continuation of the existing plan, policy or operation into the future.” For the proposed General Plan LUE Amendment, implementation of the existing 2006 General Plan represents the “No Project” alternative. Because the 2006 General Plan also represents “baseline” conditions for the General Plan LUE Amendment impact analysis, the environmental impact analysis throughout this Draft SEIR analyzes the proposed project relative to the “No Project” alternative. The “No Project” alternative discussion in Section 7.2, therefore, summarizes the findings of the Draft SEIR impact analysis, identifying the impacts that would be reduced or eliminated if the General Plan LUE Amendment were not implemented.

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Environmentally Superior Alternative

An EIR must identify an “environmentally superior” alternative and where the No Project Alternative is identified as environmentally superior, the EIR is then required to identify as environmentally superior an alternative from among the others evaluated. Each alternative's environmental impacts are compared to the proposed project and determined to be environmentally superior, neutral, or inferior. However, only those impacts found significant and unavoidable are used in making the final determination of whether an alternative is environmentally superior or inferior to the proposed project. Section 7.4 identifies the Environmentally Superior Alternative.

7.1.2 Project Objectives

As described in Section 3.2, the following objectives were established for the 2006 General Plan and remain consistent with the proposed project. These objectives will aid decision makers in their review of the project, the project alternatives, and associated environmental impacts (for easy reference in this section, these objectives have been numbered):

1. Preserve and enhance Newport Beach’s character as a beautiful, unique residential community.
2. Reflect a conservative growth strategy that
 - a. Balances needs for housing, jobs and services.
 - b. Limits land use changes to a very small amount of the City’s land area.
 - c. Directs land use changes to areas where residents have expressed a willingness to consider change and where sustainable development can occur.
 - d. Protects natural resources, open space, and recreational opportunities.
3. Protect and enhance water quality.
4. Protect and enhance recreational opportunities and public access to open space and natural resources.
5. Modify land uses, densities, and intensities so that traffic generation is controlled.

7.1.3 Significant Impacts of the Project

As discussed above, a primary consideration in defining project alternatives is their potential to reduce or eliminate significant impact compared to the proposed project. The following sections list the significant environmental impacts that would result from implementation of the proposed General Plan LUE based on the analysis in Chapter 5.0, *Environmental Analysis*.

Significant Impacts Mitigated to Less than Significant

Implementation of the General Plan LUE Amendment would result in the following impact that would be significant without mitigation. With recommended mitigation, however, this impact would be less than significant:

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Air Quality

- **Impact 5.2-4:** Placement of new residents and other sensitive land uses proximate to State Route 73 and major stationary source emitters in the Airport Area would expose sensitive receptors to substantial pollutant concentrations.

Significant Unavoidable Impacts

Implementation of the General Plan LUE Amendment would result in the following impacts that would remain significant and unavoidable after any feasible mitigation:

Greenhouse Gases

- **Impact 5.4-1:** The proposed project would achieve SCAQMD's efficiency metric and would not conflict with plans adopted for the purpose of reducing GHG emissions. Compared to the 2006 General Plan, the proposed project would result in a substantial increase in the total magnitude of GHG emissions but would decrease GHG emissions on a per capita basis (i.e., increase plan efficiency). The policies and implementation actions in the City's General Plan would ensure that GHG emissions from buildout of the proposed General Plan LUE Amendment would be minimized to the extent practicable. However, additional statewide measures would be necessary to reduce GHG emissions under the proposed project to meet the long-term GHG reduction goals under Executive Order S-03-05, which identified a goal to reduce GHG emissions to 80 percent of 1990 levels by 2050. At this time, there is no plan past 2020 that achieves the long-term GHG reduction goal established under S-03-05. As identified by the California Council on Science and Technology, the state cannot meet the 2050 goal without major advancements in technology (CCST 2012). Since no additional statewide measures are currently available, Impact 5.4-1 would remain significant and unavoidable.

Vibration

- **Impact 5.8-6:** Similar to the 2006 General Plan, development in accordance with the proposed project would increase groundborne vibration related to construction activities. Grading and demolition activities typically generate the highest vibration levels during construction activities. In particular, pile driving and rock blasting can generate high levels in excess of 100 peak particle velocity at 25 feet away. Typical construction projects do not require these methods, or if necessary, can usually be mitigated with alternative methods such as nonexplosive rock breaking (instead of rock blasting) and drilled piles (instead of impact pile driving), which do not exceed the thresholds for architectural damage and do not reach levels that are considered annoying at distances greater than 200 feet. However, as discussed in the 2006 General Plan EIR, since construction equipment for subsequent projects is unknown, there would be no feasible mitigation available to eliminate potential vibration impacts to nearby receptors if pile driving/rock blasting equipment or other activities that generate high levels are necessary for future developments. Furthermore, intensification of land uses at some of the proposed project's subareas could result in greater vibration impacts than the 2006 General Plan. Therefore, impacts would be significant and unavoidable.

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Population and Housing

- **Impact 5.9-1:** Buildout of the General Plan LUE Amendment would directly result in an estimated population increase of up to 3,838 persons in comparison to buildout of the 2006 General Plan (approximately 3.7 percent increase). This increase would exceed the 2035 SCAG population projections for the City by almost 18 percent, but slightly improve the jobs-housing balance.

Traffic

- **Impact 5.11-3:** The County of Orange is currently preparing an EIR to analyze potential impacts associated with the proposed amendment of the John Wayne Airport Settlement Agreement. The proposed amendment for the Airport Settlement Agreement would expand the number of annual passengers and average daily departures from January 1, 2021, to December 31, 2035 which would result in a greater number of automobiles and buses providing access to JWA. The increased number of vehicles may result in traffic congestion and deterioration of level of service on the roadways and intersections surrounding JWA. Until the EIR analysis for the amendment of the Airport Settlement Agreement is completed, it is not possible to identify with precision the probable traffic impacts of the proposed project. Because it cannot be determined at this point if significant impacts would occur and if mitigation measures would be feasible, impacts are concluded to be potentially significant and unavoidable.
- **Impact 5.11-5:** Project-related trip generation would contribute trips to six existing and forecast deficient main line segments of the I-405, SR-73, and SR-55 freeways and contribute to deficient ramp operations at two I-405 off-ramps. Caltrans does not have an adopted fee program that can ensure that locally contributed impact fees will be tied to improvements, and such improvements would be out of the control of the City of Newport Beach. These freeway main line and ramp impacts would be a cumulatively considerable, significant project impact.

7.2 NO PROJECT ALTERNATIVE

As discussed above, the No Project alternative is implementation of the existing 2006 General Plan. This Draft SEIR evaluates the incremental environmental impact of buildout of the 2006 General Plan in comparison to buildout of the proposed General Plan LUE Amendment. As such, the analysis throughout this Draft SEIR represents the impacts of the proposed project relative to the No Project alternative. Following is a topic-by-topic comparison of the relative impacts of the No Project alternative in comparison to the proposed project.

7.2.1 Comparison by Topic

Aesthetics

Under the No Project alternative, land use would not be intensified beyond the approved 2006 General Plan. In particular, the introduction of new, high intensity mixed use and additional housing in Newport Center and Airport Area would be limited to that permitted in the existing General Plan. The potential to obstruct

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public views would also be limited per the existing land use designations. The change in community character, however, is concluded to be less than significant under the General Plan LUE Amendment, and, as with the 2006 General Plan, public views would be protected by existing policies and environmental review requirements. This alternative would not eliminate any significant aesthetic impacts.

Air Quality

This alternative would result in less development intensity in the City and result in less criteria air pollutants generated by transportation, energy, and area sources in the City. In addition, this alternative would not intensify uses surrounding the Airport Area, which is near an industrial area with several large stationary sources of air pollution and SR-73. Unlike the proposed project, this alternative would not introduce new sensitive land uses proximate to major sources of air pollution. Air quality impacts under this alternative would be reduced compared to the proposed project.

Cultural Resources

Buildout of the 2006 General Plan in comparison to the proposed project would involve similar ground disturbance activities during construction and/or demolition. Thus, cultural resource impacts under the No Project/2006 General Plan Alternative and the proposed project would be similar.

Greenhouse Gas Emissions

Greenhouse gas emissions were not evaluated in the 2006 General Plan EIR (AB 32, the Global Warming Act was passed in 2006 and regulations subsequently adopted). As with the proposed General Plan LUE Amendment, the 2006 General Plan would result in significant greenhouse emissions. Buildout under the 2006 General Plan would result in an increase in GHG emissions in the City. As identified in Table 5.4-5 in Section 5.4, *Greenhouse Gas Emissions*, the 2006 General Plan would achieve the South Coast Air Quality Management District's (SCAQMD) plan-level efficiency metric of 6.6 metric tons of carbon dioxide-equivalent (MTCO₂e) emissions. However, the 2006 General Plan would be slightly less efficient on a per capita basis compared to the proposed project. Consequently, GHG impacts under this alternative would be similar to the proposed project.

Hazards and Hazardous Materials

Buildout of the 2006 General Plan would involve land use development and redevelopment on hazardous materials sites listed on regulatory agency databases; in areas where land uses are limited respecting potential crashes of aircraft departing John Wayne Airport (JWA); and in areas where building heights are restricted to avoid intrusions into airspace used by aircraft departing and approaching JWA. These hazards were found less than significant in the 2006 General Plan EIR after implementation of relevant General Plan policies.

The No Project alternative would not include intensification of land uses within the Airport Area (beyond the 2006 General Plan) and would not increase potential exposure to identified hazardous sites and airport related safety risks. The No Project alternative, therefore, would reduce Hazards and Hazardous Materials impacts in comparison to the proposed project.

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Hydrology and Water Quality

Hydrology and water quality impacts for both the No Project Alternative and proposed project would be less than significant upon implementation of applicable General Plan policies and regulatory requirements. The intensification of land uses under the proposed General Plan LUE Amendment would not appreciably change the potential to drainage and water quality. Impacts of the No Project alternative would be similar to the proposed project.

Land Use and Planning

This alternative would result in less development intensity than the proposed project. However, consistency with applicable plans and policies including policies and/or development standards in the 2006 General Plan policies, Coastal Land Use Plan, and Planned Community Development Standards would nominally change. Overall, land use and planning impacts would be similar to the proposed project and remain less than significant.

Noise and Vibration

The No Project Alternative would result in less intensive development within selected areas of the City compared to the proposed project. While the Newport Coast subarea could potentially experience more construction activity under the 2006 General Plan, there would be more areas, overall, that would see a decrease in development intensity. A reduction in development intensity would reduce short-term noise impacts to nearby sensitive receptors. Additionally, a reduction in development intensity would also reduce construction-related vibration impacts to nearby sensitive receptors. This alternative would also reduce long-term noise impacts. A reduction in land use intensity would reduce the number of new vehicle trips generated and new stationary sources of noise introduced. In addition, this alternative would reduce potential airport-related noise impacts to the Airport Area subarea. Overall, under this alternative, short- and long-term noise impacts would be reduced compared to the proposed project. As with the proposed project, noise impacts would be less than significant. This alternative, however, would eliminate the significant vibration impact associated with the increase in construction-related impacts in comparison to the 2006 General Plan under the proposed General Plan LUE Amendment.

Population and Housing

The 2006 General Plan EIR found that implementation of the 2006 General Plan would add approximately 8,192 residents and 8,810 households to the City, and that these increases would exceed regional projections and would therefore be a significant and unavoidable impact. This alternative, however, would eliminate the significant, unavoidable associated with the proposed General Plan LUE Amendment, which is projected to increase population an additional 3,838 persons, an estimate 3.7 percent increase over the 2006 General Plan projections.

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Public Services

Buildout of the No Project Alternative would result in fewer people, homes, commercial, and office developments than the proposed project, which decreases demand for fire, police, schools, and park services. Therefore, this alternative would reduce impacts on public services.

Transportation and Traffic

The No Project Alternative would result in less intensive development within selected areas of the City and generate fewer trips than the proposed project. As discussed in the Section 5.11, *Transportation and Traffic*, the following intersections would be deficient under the 2006 General Plan (No Project) scenario:

- Superior Avenue at Coast Highway (AM)
- Newport Boulevard (West) at Coast Highway (AM)
- Jamboree Road at Michelson Drive (PM)

Relative to the proposed project, the No Project Alternative would eliminate significant freeway system impacts (main line segments and ramps) and the potentially significant cumulative impact associated with increased vehicle trips due to the Airport Settlement Agreement.

Utilities and Service Systems

Because the General Plan LUE Amendment would intensify development and generate an increase in the City's population, the proposed project would generate additional wastewater, stormwater runoff, and solid waste, and create additional demand for water supply, natural gas, and electricity. Therefore, the No Project would reduce Utility and Service System impacts in comparison to the proposed project.

7.2.2 Ability to Reduce Environmental Impacts

The No Project alternative would eliminate the significant impacts of the proposed project, including unavoidable, significant impacts related to greenhouse gases, noise and vibration (construction-related vibration), population and housing (population growth), and transportation and traffic (freeway main line and ramp impact and potentially significant cumulative impact related to Airport Settlement Agreement trip generation). The No Project alternative would also eliminate a significant air quality impact related to placing sensitive receptors (housing and congregate care) proximate to high pollutant concentrations. This impact, however, would be mitigated to less than significant under the proposed project.

The No Project alternative would not have the benefit of the new and/or modified Land Use Element policies. The updated policies reflect State of California legislation subsequent to adoption of the 2006 General Plan and new best planning practices since 2006 addressing sustainability, climate change, and healthy communities.

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7.2.3 Ability to Achieve Project Objectives

The purpose of the proposed General Plan LUE amendment is to 1) increase/decrease development capacity in specific areas of the City and 2) to modify land use policies to better reflect land use changes within the City and to support recent Neighborhood Revitalization efforts. The project objectives for the proposed General Plan LUE Amendment reflect the same objectives as the 2006 General Plan.

The No Project Alternative (existing 2006 General Plan) would continue to attain these objectives, in particular objectives Nos. 1, 3, 4, and 5 (see Section 7.1.2, above). Compliance with 2006 General Plan policies would preserve and enhance the City's character; protect and enhance water quality; protect and enhance recreational opportunities and public access to open space and natural resources; and control traffic generation. In comparison to the General Plan LUE Amendment, however, the No Project alternative would not be as effective in achieving balancing needs for housing, jobs, and services. The proposed General Plan LUE Amendment is in response to changing demand for housing and commercial uses. The proposed project would add housing and slightly improve the City's jobs-housing balance (from 1.83 to 1.76). Since the City is considered to be "jobs rich," this is a benefit of the proposed project that would not be realized under the No Project alternative. The No Project alternative may also not be as responsive to Project Objective 2.c, regarding "directing land use changes to areas where residents have expressed a willingness to consider change...." The proposed project's land use changes are in response to property owners' request for change. This may or may not, however, reflect "resident" willingness.

The No Project alternative would not change land uses in comparison to the proposed project and so would not generate additional vehicle trips in comparison to the proposed General Plan LUE Amendment. Therefore, it may be considered more effective in achieving Project Objective No. 5. The proposed General Plan LUE Amendment would result in two significant traffic impacts that would be eliminated with the No Project alternative (cumulative impacts to freeway main line and ramps and trip contribution to a potential, cumulative traffic impact associated with the Airport Settlement Agreement).

7.3 NO AIRPORT AREA LAND USE CHANGES ALTERNATIVE (NO AIRPORT AREA)

This alternative would eliminate the proposed land uses changes in the Airport Area subarea, including changes to the Saunders Properties, The Hangars, Lyon Communities, and UAP Companies. These proposed changes for these properties under the General Plan LUE Amendment are summarized in Table 3-1, *Proposed Land Use Changes*, and shown on Figure 3-4, *Airport Area Proposed Changes*. It was selected for evaluation based on its potential to reduce or eliminate each of the impacts identified as significant for the General Plan LUE Amendment as proposed. As shown in Table 7-1, *Proposed Project vs. No Airport Area Land Use Changes Alternative Buildout Comparison*, this alternative would substantially reduce the overall intensity of land uses proposed. Therefore, it would reduce both construction-related vibration impacts, and greenhouse gas impacts. It was selected in particular, however, for its potential to reduce impacts related to the proximity to the John Wayne Airport. Avoiding intensification of land uses within this subarea has the potential to reduce or eliminate the significant traffic impacts related to freeways proximate to this subarea as well as cumulative impacts associated with the Airport Settlement Agreement. And finally, although the significant air quality

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impact associated with placing sensitive receptors (housing) proximate to major air pollutant sources would be mitigated to less than significant, this alternative would avoid this impact.

Table 7-1 Proposed Project vs. No Airport Area Land Use Changes Alternative Statistical Comparison

Land Use	Increase/Decrease Compare to 2006 GP		Change	% Change
	Proposed Project	No Airport Area Alternative		
Residential	1,729 DUs*	144 DUs	(1,591 DUs)	-92.0%
Hotel	(701) rooms	(851) rooms	(150 rooms)	-21.4%
Commercial	71,110 SF	(25,690 SF)	(96,800 SF)	-136%
Office	493,677 SF	255,600 SF	(238,077 SF)	-48.2%
Elementary/High School Students	72 students	72 students	0 students	0%

Source: Urban Crossroads 2013.

* The 1,729 DU buildout was calculated by adding the allowable dwelling unit developments in each subarea as proposed by the General Plan Land Use Element Amendment. This includes Newport Center (500 DUs), Saunders Properties (329 DUs), Lyon Communities (850 DUs), Newport Ridge (-356 DUs), and other minor changes (-6 DUs). Furthermore, density bonuses on Lyon Communities (297 DUs) and Saunders Properties (115 DUs) were added to the buildout to achieve 1,729 DU.

The No Airport Area Alternative would include the same changes to the General Plan LUE policies as the proposed project, with the exception of any policies specifically altered to accommodate the proposed Airport Area land uses changes under the proposed project. Such policies would not be included in this alternative (e.g., LU 6.15.5 Residential and Supporting Uses, regarding the maximum number of replacement units).

7.3.1 Comparison by Topic

Aesthetics

The No Airport Area would not alter the character of the subarea relative to the 2006 General Plan. Upon buildout, in comparison to the proposed project, the height and massing of development within this area would be reduced, and the character would be different. Impacts to public views would be similar as the proposed project. Overall, aesthetic impacts would be reduced, and, as with the proposed project, less than significant.

Air Quality

This alternative would substantially reduce development intensity changes in comparison to the proposed General Plan LUE Amendment. The reduction of 1,591 housing units, approximately 96,800 square feet commercial, and 238,000 square feet of office space would reduce criteria air pollutants generated by transportation, energy, and area sources in the City. Unlike the proposed project, this alternative would not introduce new sensitive land uses proximate to major sources of air pollution (SR-73 and Airport Area industrial sources) and would eliminate this significant impact in comparison to the proposed project. Under the proposed project, the placement of sensitive uses proximate to pollutant concentrations would be

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mitigated to less than significant. Therefore, impacts under this alternative would be reduced in comparison to the proposed project, but this alternative would not eliminate a significant, unavoidable impact.

Cultural Resources

In comparison to the proposed General Plan LUE Amendment, buildout of this alternative would reduce potential ground disturbance activities during construction and/or demolition. Although Airport Area land uses would still likely be redeveloped under the existing General Plan, new excavation and/or underground parking would be less likely than under the proposed project. This change, however, would be minimal in relation to City-wide development, and therefore, potential cultural resource impacts under this alternative would be similar to the proposed project.

Greenhouse Gas Emissions

This alternative would result in a slight decrease in development intensity in the City because of a reduction in residential and nonresidential development in the Airport Area. Both this alternative and the proposed project would achieve SCAQMD's plan-level efficiency metric. As with the proposed project, although reduced, this alternative would result in a significant, unavoidable GHG impact.

Hazards and Hazardous Materials

The proposed Airport Area subareas contain the greatest numbers of listed hazardous materials sites in and within 0.25 mile of the subareas than any other subareas in the City. Thus, eliminating potential land use changes within the Airport Area would reduce hazards to new residents and workers relative to the intensification of uses in this area proposed by the General Plan LUE Amendment.

Similarly, this alternative would reduce airport-related hazards in comparison to the proposed project. Under this alternative, all proposed areas of changed land use designations or increased development capacities would be outside of the Airport Area designated safety zones. Hazards related to safety zones and building height restrictions for John Wayne Airport would be reduced by this alternative. As with the proposed General Plan LUE Amendment, hazard and hazardous materials impacts would be less than significant under this alternative.

Hydrology and Water Quality

Development potential under this alternative would be reduced in comparison to the proposed General Plan LUE Amendment. Impacts to water pollution, erosion, and siltation impacts would be reduced. As with the proposed project, impacts would be less than significant after compliance with General Plan policies and implementation of regulatory requirements.

Land Use and Planning

This alternative would eliminate all proposed changes in the Airport Area and therefore reduce development capacity of the overall project by a considerable amount. In addition, Lyon Communities and UAP Companies, which fall within the Koll Center Planned Community boundaries, would not be required to amend the Koll Center PC because of their inconsistent proposed land use changes under the General Plan

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LUE Amendment. Thus, while impacts under this alternative would be less than significant like the proposed project, they would be further reduced.

Noise and Vibration

Under this alternative, short- and long-term noise impacts in the unaffected planning areas would be similar to the proposed project. However, elimination of the proposed land use changes to the Airport Area subarea would reduce the number of new sensitive uses to the area and would therefore reduce noise compatibility impacts. Overall, noise impacts would be slightly reduced under this alternative and would remain less than significant.

Population and Housing

In comparison to the proposed General Plan LUE Amendment, this alternative would reduce the number of housing units that would be added to the City by 329 units in the Saunders Properties (Airport Area), 850 units for the Lyon Communities property (“replacement units” for office space), and the additional density bonus units for both properties. Therefore, this alternative would result in a net increase of 144 units City-wide compared to buildout of the 2006 General Plan. Based on the City-wide household size of 2.2, this would generate an estimated 724 persons in the City. This would compare to 3,838 for the proposed project. This alternative would eliminate about 97,000 square feet of increased retail development capacity and 238,077 square feet of office space, and a 150-room hotel relative to the proposed General Plan LUE Amendment. Based on an estimated job generation of 1 job per 500 square feet of retail and 1 job per 250 square feet of office space, the No Airport Area alternative would generate 1,146 fewer jobs than the proposed General Plan LUE Amendment. This would slightly increase the existing jobs-housing balance City-wide from 1.84 to 1.85. Overall, the population impact of this alternative would be reduced in comparison to the proposed project, but the jobs-housing balance impact would be greater. Impacts would therefore be considered similar, and as with the proposed project, would remain significant because the population increase would exceed the 2035 SCAG population projection for the City.

Public Services

This alternative would reduce the number of dwelling units and a large amount of commercial, hotel, and office use within the Airport Area. By doing so, the number of people living and working in the Airport Area would decrease, and demand for public services (i.e., fire, police, schools, and park services) would be reduced in comparison to the proposed project. As with the proposed General Plan LUE Amendment, impacts would be less than significant.

Transportation and Traffic

Elimination of the land use changes in the Airport Area would reduce trip generation associated with the project. Table 7-2 compares estimated trip generation for the proposed General Plan LUE Amendment in comparison to the No Airport Area alternative. The numbers for the proposed project and the alternative reflect the changes in trip generation in comparison to the 2006 General Plan. As shown, this alternative would generate 10,771 fewer daily trips and fewer AM and PM peak hour trips than the proposed General Plan LUE Amendment.

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Table 7-2 Citywide Trip Generation Comparison in Comparison to 2006 General Plan

Area	AM		PM		ADT
	In	Out	In	Out	
Proposed Project (LUE Amendment)	+260	+521	+434	+324	+8,221
No Airport Area Alternative	-95	-57	-112	-124	-2,550
Difference between No Airport Area Alternative and Proposed Project	-355	-578	-546	-448	-10,771

Source: Tables ES-4 and ES-5 of the Traffic Study (Urban Crossroads, March 11, 2014).

This alternative would contribute peak hour trips to I-405, SR-73, and SR-55 freeway segments that have continued deficient operations, as presented in Table 5-5 of the traffic study. The operations were also determined to be deficient for the 2006 General Plan. Any increase in peak hour trips on these segments (1 to 49) is defined as a significant impact. In comparison to the proposed project, however, the No Airport Area Alternative would eliminate a significant impact at one freeway main line segment: NB SR-55, MacArthur Boulevard to I-405 Freeway in the AM peak hour, because it would not contribute any trips. However, it would add a new impact at the freeway main line segment of NB I-405, south of Jamboree Road in the AM peak hour, in comparison to the proposed project. The freeway segment impact would be similar in comparison to the proposed project, but would remain significant.

The proposed project was determined to significantly impact two freeway off-ramps: I-405, NB off-ramp at MacArthur Blvd., and I-405, SB Loop off-ramp at MacArthur Blvd. The No Airport Area alternative would not impact one of these ramps (NB Off-Ramp at MacArthur Blvd.). Therefore, the alternative would reduce ramp impacts in comparison to the proposed project.

Because this alternative would reduce traffic trips, particularly around the Airport Area, this alternative is anticipated to reduce cumulative traffic impacts related to the potential increase in vehicle trips due to the Airport Settlement Agreement. Since the analysis for the Airport Settlement Agreement has yet to be publicly released, however, the cumulative analysis with the proposed project and No Airport Area has not been prepared. At this time, this impact is considered a potentially cumulative impact for the proposed project and for this project alternative.

Overall transportation and traffic impacts of the No Airport Area alternative would be reduced in comparison to the proposed project, but this alternative would not eliminate any significant traffic impacts of the proposed project.

Utilities and Service Systems

By substantially decreasing the development potential of the proposed project, the amount of wastewater, stormwater runoff, and solid waste generated by this alternative would be considerably less than the proposed project. In addition, water, natural gas, and electricity use would be reduced under this alternative because there would be fewer residents, workers, and buildings. Thus, impacts under the No Airport Area Alternative would be reduced compared to the proposed project and remain less than significant.

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7.3.2 Ability to Reduce Environmental Impacts

The No Airport Area alternative would reduce environmental impacts to every topical area. For many impacts, the reduction would be directly related to the decrease in development capacity and related decreases in population generation, traffic trips, service requirements, etc. Some impacts would be reduced by avoiding intensifying development within the Airport Area because of the character of the area. For example, hazards associated with John Wayne Airport would be reduced, as well as hazards associated with hazardous materials because of a concentration of these sites within this subarea. Similarly, this alternative would not introduce new sensitive uses to airport noise impacts.

This alternative would eliminate the significant air quality impact of placing sensitive uses adjacent to high concentrations of pollutants. This impact, however, would be mitigated to less than significant for the proposed project.

This alternative would not eliminate any unavoidable significant impacts of the project, but would reduce all of them. It would reduce population generation, GHG emissions, and construction-vibration impacts. These impacts, however, would remain significant and unavoidable for this alternative. It would substantially reduce trip generation relative to the proposed General Plan LUE Amendment and would eliminate significant impacts to one of two freeway ramps significantly impacted by the project. It would not, however, eliminate significant impacts to main line freeway segments or one freeway ramp. Further, it would not eliminate the potentially significant impact associated with the Airport Settlement Agreement.

7.3.3 Ability to Achieve Project Objectives

The purpose of the proposed General Plan LUE amendment is to 1) increase/decrease development capacity in specific areas of the City and 2) to modify land use policies to better reflect land use changes within the City and to support recent Neighborhood Revitalization efforts. The project objectives for the proposed General Plan LUE Amendment reflect the same objectives as the 2006 General Plan.

The No Airport Area alternative would be clearly consistent with most of the 2006 General Plan's objectives. The proposed change would not jeopardize the potential to preserve and enhance the city's character (No. 1); protect and enhance water quality (No. 3); and protect and enhance recreational opportunities and public access to open space. This alternative would be more successful in achieving project objective No. 5, "modify land uses, densities and intensities so that traffic generation is controlled." It would not eliminate significant traffic impacts, but would reduce them relative to the proposed project. The extent to which this alternative would achieve Project Objective No. 2 is less apparent. Compared to the proposed project it would more successfully "limit land use changes to a very small amount of the City's land area" but may be considered less successful in balancing need for housing, jobs and services. It would provide fewer housing opportunities and new jobs and slightly increase the jobs-housing balance in the City, which is already "jobs rich." Moreover, although property owners have requested the Airport Area changes, it does not necessarily mean that City residents overall welcome the changes proposed.

7. Alternatives to the Proposed Project

7.4 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires a lead agency to identify the “environmentally superior alternative,” and in cases where the “No Project” Alternative is environmentally superior to the proposed project, the environmentally superior development alternative must be identified.

The No Project (existing 2006 General Plan) is environmentally superior to the proposed General Plan LUE Amendment. It would completely eliminate the significant impacts associated with the proposed General Plan LUE Amendment.

Only one development alternative was evaluated in this Draft SEIR, the No Airport Area Land Use Changes (No Airport Area) alternative. This alternative has been identified as the “environmentally superior” alternative. This alternative would lessen impacts associated with the proposed project for all topical environmental impacts evaluated. It would not, however, eliminate any of the significant, unavoidable impacts of the General Plan LUE Amendment.

7. Alternatives to the Proposed Project

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