

# 7. Alternatives to the Proposed Project

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## 7.1 INTRODUCTION

### 7.1.1 Purpose and Scope

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 § 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 (§§ 15126.6[a] through [f]) are summarized below to explain the foundation and legal requirements for the alternatives analysis in the EIR.

- “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 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]).

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- “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]).

For each development alternative, this analysis:

- Describes the alternative,
- Analyzes the impact of the alternative as compared to the proposed Project,
- Identifies the impacts of the Project that would be avoided or lessened by the alternative,
- Assesses whether the alternative would meet most of the basic Project objectives, and
- Evaluates the comparative merits of the alternative and the Project.

Per the CEQA Guidelines Section 15126.6(d), additional significant effects of the alternatives are discussed in less detail than the significant effects of the Project as proposed.

### 7.1.2 Project Objectives

As described in Section 3.2, the following objectives have been established for the proposed Project and will aid decision makers in their review of the Project, the Project alternatives, and associated environmental impacts. The objectives incorporate the Guiding Principles established for the proposed Southeast Area Specific Plan.

- **Objective 1:** Implement projects within the Southeast Area Specific Plan that give equal consideration to planning, environmental and economic feasibility.
- **Objective 2:** Balance responsible growth with resource preservation through a flexible land use plan that provides a greater mix of uses and through an implementation strategy that is tailored to the local economy.
- **Objective 3:** Provide clear standards and guidelines to encourage future development that respects the wetlands, protects views, and creates a sense of place through thoughtful building placement, form, and architectural design.

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- **Objective 4:** Expand multimodal transportation options through enhanced pedestrian and bicycle connectivity without compromising vehicular traffic flow.
- **Objective 5:** Provide options to increase public connectivity to open space, including the marina, other waterways, the wetlands, and parks.
- **Objective 6:** Identify and plan for enhanced gateway and landmark locations that define the entrance to the City and contribute to a sense of place for the area.

### 7.2 ALTERNATIVES CONSIDERED AND REJECTED DURING THE SCOPING/PROJECT PLANNING PROCESS

The following is a discussion of the land use alternatives considered during the scoping and planning process and the reasons why they were not selected for detailed analysis in this Draft EIR (EIR).

#### 7.2.1 Alternative Development Areas

CEQA requires that the discussion of alternatives focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project. The key question and first step in the analysis is whether any of the significant effects of the Project would be avoided or substantially lessened by putting the Project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the Project need be considered for inclusion in the EIR (Guidelines § 15126.6(f)(2)(A)). In general, any development of the size and type proposed by the Project would have substantially the same impacts on air quality, land use and planning, noise, population and housing, public services, recreation, and utilities and service systems. Since the City is highly urbanized, impacts to traffic would also occur in other areas of the City. Without a site-specific analysis, impacts on aesthetics, biological resources, geology and soils, hazards and hazardous materials, hydrology and water quality, and mineral resources cannot be evaluated. These impacts were found to be less than significant or less than significant with mitigation incorporated. Therefore, another location would not avoid or substantially lessen the effects of the proposed Project. The City of Long Beach is largely built out and redevelopment in other areas of the City has the potential to encounter unknown cultural or historical resources.

As discussed in Section 1.2 of the Southeast Area Specific Plan, the Project area is one of the last remaining areas of Long Beach that is not entirely built out. It has approximately 175 acres of undeveloped wetlands and several underutilized properties that are substantial in size, aging, and nearing the end of their useful life in their existing configurations. Residents, property owners, and the City have long recognized the importance of this area to Long Beach and emphasized the need for thoughtful long-term planning. The purpose of the Specific Plan is to provide a regulatory

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framework that is tailored specific for this area. It includes customized land uses and development standards, provides expanded multimodal transportation choices, and identifies locations for future development potential that maintain, and preserve valuable natural resources. Since this is the last remaining piece in Long Beach that can accommodate a development of this size and the plan is suited particularly for the Project area, placing this Specific Plan or ultimate development in another area of the City is not feasible.

### 7.2.2 Alternate Land Use Design

An Alternative Land Use Design was considered to accommodate the proposed development while reducing traffic impacts at the most impacted intersections, including 2nd Street and PCH. This alternative would move the intensity away from the proposed mixed-use area and toward the industrial area along Studebaker, north of 2nd Street/Westminster. However, this alternative was rejected because of the incompatibility of placing mixed uses near ongoing industrial uses. This alternative would significantly increase the costs associated with new development, which would hinder rather than revitalize the area. Increased costs would occur due to the well-established energy infrastructure with no plans to relocate (SEC expansion), regulations required to redevelop industrial property into residential and mixed uses, and the substantial increase in potential hazardous materials and health risks. Furthermore, this alternative would not meet any of the Project objectives.

### 7.2.3 Increased Residential Alternative

The Increased Residential Alternative was considered to provide additional housing opportunities to the Project area consistent with the City's Housing Element. The alternative considered would have allowed for a total of 11,318 residential units, 425 hotel rooms, and 2,665,052 nonresidential square feet. This results in an increase of 1,800 units over the proposed Project and the same number of hotel rooms and nonresidential square footage. Although this alternative meets several of the Project objectives, it would increase impacts under all environmental topical areas. Importantly, it would substantially increase trip generation by 52 percent over the proposed Project in an area that is already highly congested. This alternative would result in a 65 percent increase in AM peak hour trips and 76 percent increase in PM peak hour trips. Since the surrounding area is housing-rich, this alternative would also increase vehicle miles traveled (VMT) and VMT per capita. Since the alternative would result in greater environmental impacts and would not eliminate any significant unavoidable impacts of the proposed Project, it was rejected from further consideration.

## 7.3 ALTERNATIVES SELECTED FOR FURTHER ANALYSIS

Based on the criteria listed above, the following four alternatives have been determined to represent a reasonable range of alternatives that have the potential to feasibly attain most of the basic

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objectives of the Project but may avoid or substantially lessen significant effects of the Project. These alternatives are analyzed in detail in the following sections.

- No Project/Adopted PD-1 (SEADIP)
- No Project/No Development Alternative
- Reduced Intensity Alternative
- Reduced Building Height Alternative

An EIR must identify an “environmentally superior” alternative, and where the No Project Alternative is identified as environmentally superior, the EIR is 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. Impacts found to be significant and unavoidable include air quality, historical resources, greenhouse gas emissions, noise (construction), and traffic (see Section 6 of this DEIR). Section 7.8 identifies the Environmentally Superior Alternative.

### 7.3.1 Alternatives Comparison

The following statistical analysis provides a summary of general socioeconomic buildout projections determined by the four land use alternatives, including the proposed Project. It is important to note that these are not growth projections. They are not meant to anticipate what is likely to occur by a certain time horizon, but provide a buildout scenario that would only occur if the entire Project area were to develop to the probable capacities yielded by the land use alternatives.

The following statistics were developed as a tool to understand better the difference between the alternatives analyzed in the DEIR. Table 7-1 identifies dwelling unit, population, nonresidential square feet, employment, and jobs-to-housing ratio for each of the alternatives.

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**Table 7-1 Buildout Statistical Summary**

	<b>Proposed Project</b>	<b>No Project/ Adopted PD-1 (SEADIP) Alternative</b>	<b>No Project/No Development Alternative</b>	<b>Reduced Intensity Alternative</b>	<b>Reduced Building Height Alternative</b>
Dwelling Units	9,518	5,499	4,079	6,663	9,518
Population	15,134	8,743	6,486	10,594	15,134
Commercial/Employment Square Feet	2,665,052	3,106,610	2,091,476	2,398,547	2,665,052
Hotel Rooms	425	375	375	375	425
Employment	4,115	5,280	3,555	3,704	4,115

**7.4 NO PROJECT/ADOPTED PD-1 (SEADIP) ALTERNATIVE**

Section 15126.6(e) of the CEQA Guidelines requires that an EIR evaluate and analyze the impacts of the “No-Project” Alternative. When the project is the revision of an existing land use or regulatory plan, policy, or ongoing operation, the no-project alternative is the continuation of the plan, policy, or operation into the future. Therefore, under the No Project/Adopted PD-1(SEADIP) Alternative, the current General Plan land uses and zoning would remain in effect. All proposed changes to land uses and boundaries in the Specific Plan area would not occur. Development in accordance with the adopted PD-1 would continue to occur, allowing for a total of 5,499 residential units, 375 hotel rooms, and 3,106,610 square feet of commercial uses. This represents an increase of 441,558 square feet of commercial uses and reduction of 4,019 residential units and 50 hotel rooms compared to the proposed Project.

The current land use designations of the Project area are outlined in Planned Development District 1 (PD-1), which was adopted in 1977. The 1977 PD-1 divides the Project area into 33 subareas and details land uses and development standards for some of the subareas. The current PD-1 planned uses include Residential, Commercial, Public/Institutional, Parks and Recreation, Industrial, Undeveloped, Water, and Rights-of-Way (ROW). The ultimate circulation plan assumes Studebaker would be extended to connect between Shopkeeper and Second Street. Figure 7-1 illustrates the PD-1 subareas.

Figure 7-1 - PD-1 Subareas  
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### 7.4.1 Aesthetics

Impacts associated with aesthetics include the degradation of scenic vistas, decreased visual quality, and increased light and glare. Similar to the proposed Project, the No Project/Adopted PD-1 (SEADIP) Alternative would not impact a scenic vista. This alternative would also restrict the building height to 30 feet for residential uses and 35 feet for non-residential uses for the vast majority of new development. Although this alternative would reduce the allowable building height compared to the Project—the proposed Specific Plan would allow 5 and 7 stories in portions of the mixed-use land use designations—it would not enhance view corridors. The proposed Specific Plan would enhance views by creating a block structure in the Mixed Use Community Core land use area, introducing new sightlines that would extend between PCH and the scenic vistas beyond, including views of Alamitos Bay to the west and the Los Cerritos Wetlands to the east.

The No Project/Adopted PD-1 (SEADIP) Alternative would result in decreased visual quality compared to the proposed Project. The character of the Project area would continue to be defined by the adopted PD-1. Unlike the proposed Project, this alternative does not include development standards and design guidelines for existing commercial areas along the PCH corridor: see PD-1 Subareas 16, 17, and 18 (currently developed as Marina Pacifica Mall, Seaport Marina Hotel, and the Marketplace). Additionally, PD-1 does not concentrate new development within existing developed areas and along the PCH corridor. For example, areas of the proposed Project designed for limited uses and preservation under the Coastal, Habitat, Wetlands & Recreation land use would be allowed more intense development under PD-1. Specifically, Subarea 11b allows residential uses at 8.4 dwelling units per acre (du/ac), and Subareas 25 and 26 would allow business park uses (office commercial and light industrial). This alternative would not include the proposed development standards and design guidelines that emphasize land use compatibility, enhanced building form and architectural design, and view preservation.

The No Project/Adopted PD-1 (SEADIP) Alternative would have slightly greater impacts related to light and glare since it would allow a greater intensity of land uses on undeveloped areas. As stated above, residential and business park uses would be allowed in Subareas 11b, 25, and 26. Additionally, development under this alternative would not be subject to the proposed Specific Plan design guidelines that reduce impacts related to light and glare (see DEIR page 5.1-20). However, it should be noted that all new development under this alternative or the proposed Project would be subject of the City's Municipal Code, which would ensure that light and glare would be minimized. Overall, aesthetic impacts associated with the No Project/Adopted PD-1 (SEADIP) Alternative would be greater than the proposed Project.

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### 7.4.2 Agriculture and Forestry Resources

Similar to the proposed Project, no impacts to agricultural and forestry resources would occur under the No Project/Adopted PD-1 (SEADIP) Alternative.

### 7.4.3 Air Quality

The No Project/Adopted PD-1 (SEADIP) Alternative would modify the proposed land uses by reducing the residential units by 4,019 and increasing nonresidential square footage by 3,106,610. The primary effect would be to eliminate the increased residential uses in the proposed mixed use land use designations. The substantial reduction in residential development would reduce stationary-source emissions. However, this would be offset by the increase in nonresidential square footage.

Based on an average of 1,147 square feet per dwelling unit,<sup>1</sup> the decrease in residential units would total 4.6 million square feet, which is more than the increase in nonresidential square footage (3.1 million). A reduction in overall development square footage would also reduce short-term emissions related to Project construction activities. However, it would not eliminate significant long- and short-term criteria pollutant contributions of volatile organic compounds (VOC), nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), sulfur dioxide (SO<sub>2</sub>), and coarse and fine particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>).

This alternative would decrease vehicle trips by 1 percent, resulting in a reduction in mobile source emissions. However, similar to the proposed Project, this alternative would not be consistent with the air quality management plan because criteria pollutants thresholds would be exceeded, and it would cumulatively contribute to the SoCAB nonattainment designations for ozone (O<sub>3</sub>), PM<sub>10</sub>, and PM<sub>2.5</sub>. Implementation of the proposed Specific Plan was found to have significant and unavoidable impacts to long- and short-term air quality. This alternative would slightly reduce air quality impacts, but would not eliminate any significant impacts.

### 7.4.4 Biological Impacts

The No Project/Adopted PD-1 (SEADIP) Alternative would result in increased impacts to biological resources. Although the adopted PD-1 makes some provision for the maintenance and restoration of wetlands and buffers, it would allow increased development in undeveloped areas in and adjacent to the Los Cerritos Wetland Complex (LCWC). For example, as stated above, residential and business park uses would be allowed in Subareas 11b, 25, and 26, in the LCWC. This could increase direct impacts to jurisdictional wetlands and increase conflicts between the urban and wetland interface. Additionally, the adopted PD-1 does not include a wetland monitoring fund like

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<sup>1</sup> Derived from US Census data average square feet of multifamily unit over the last 14 years (<http://www.census.gov/construction/charts/mfu.html>).

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the proposed Project. The extension of Studebaker Road would create a new impact to jurisdictional wetlands along the identified alignment, requiring Coastal Commission approval, and this is a new significant impact. Overall, biological resources impacts of this alternative would be greater than the proposed Project.

### 7.4.5 Cultural Resources

Similar to the proposed Project, implementation of the No Project/Adopted PD-1 (SEADIP) Alternative could uncover cultural resources during grading. This alternative would increase the allowable development area on undeveloped properties, increasing the potential to uncover buried resources. Impacts related to historical resources would be the same as the proposed Project. Overall, impacts would be slightly greater.

### 7.4.6 Geology and Soils

The development area under the No Project/Adopted PD-1 (SEADIP) Alternative would be altered as compared to the proposed Project; however, the geotechnical conditions would be similar. New development under the alternative and the proposed Project would be required to avoid placing structures within 50 feet of the Newport-Inglewood Fault Zone and to meet CBC requirements to safeguard against major structural failures or loss of life caused by earthquakes and other geologic hazards. Both scenarios would be subject to similar soil conditions and hazards—such as liquefaction, subsidence, collapsible soils, or expansive soils. Impacts would be similar to the proposed Project.

### 7.4.7 Greenhouse Gas Emissions

As stated above, the No Project/Adopted PD-1 (SEADIP) Alternative would result in a reduction of residential dwelling units and overall building square footage and would decrease trips by 1 percent. This would result in a slight reduction of construction and operational GHG emissions.

This alternative would lose the potential benefits derived from more mixed-use development in the Specific Plan area, which serve to increase internal trip capture; reduce VMT and VMT per capita; and reduce the distances between residences, employment, services, and amenities. In addition, impacts from this alternative would still be significant and unavoidable, since additional statewide measures would be necessary to reduce GHG emissions to meet the long-term GHG reduction goals under Executive Order S-03-05 (goal to reduce GHG emissions to 80 percent of 1990 levels by 2050) and Executive Order B-30-15 (identify goal to reduce GHG emissions for 2030). Currently, there is no plan past 2020 that achieves the long-term GHG reduction goal established under Executive Order S-03-05 or the new Executive Order B-30-15. As identified by the California Council on Science and Technology, the state cannot meet the 2050 goal without major

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advancements in technology. Since no additional statewide measures are currently available, impacts would remain significant and unavoidable.

### 7.4.8 Hazards and Hazardous Materials

Similar to the proposed Project, buildout of the No Project/Adopted PD-1 (SEADIP) Alternative would involve the use of hazardous materials during construction and could expose construction workers to hazardous materials during demolition from ACMs or grading from contaminated soils. However, construction materials such as fuels, paints, and solvents would be used in limited quantities and would not pose a significant safety hazard. Any remediation and or demolition would be required to comply with the appropriate state standards, guidelines, and responsible agency (Department of Toxic Substances Control [DTSC], Regional Water Quality Control Board [RWQCB], Long Beach Fire Department [LBFD]).

Similar to the proposed Project, new development is not expected to involve the use of large amounts of hazardous materials. Hazards to the public or the environment arising from the routine use, storage, transport, and disposal of hazardous materials during operation of this alternative would not occur.

### 7.4.9 Hydrology and Water Quality

Under the No Project/Adopted PD-1 (SEADIP) Alternative, there would be an increase in the amount of impervious surfaces, which would increase the amount of stormwater to the City storm drains serving the Project area. This would result in greater impacts to the existing storm drain system compared to the proposed Project, because the Project would decrease the amount of impervious surfaces and associated stormwater flow. Both scenarios would require storm-drain infrastructure to be improved and designed in accordance with the Long Beach and Los Angeles County Public Works requirements.

This alternative would increase impervious surfaces by allowing additional development in undeveloped areas. This would reduce the amount of runoff that infiltrates and recharges groundwater. However, similar to the proposed Project, this alternative would be required to incorporate water quality low-impact development (LID) features to allow increased infiltration.

Similar to the proposed Project, the No Project/Adopted PD-1 (SEADIP) Alternative would not result in new development or structures within a 100-year flood zone. Additionally, flood hazards due to seiche, mudflow, and tsunami flood hazards would be similar to the proposed Project.

Similar to the proposed Project, the No Project/Adopted PD-1 (SEADIP) Alternative would be required to implement water quality measures to reduce impacts during construction and operation of the proposed Project. Under either scenario, compliance with water quality regulations would

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reduce water quality impacts to less than significant. The No Project/Adopted PD-1 (SEADIP) Alternative would result in slightly greater impacts on water quality by introducing new sources of runoff in previously undeveloped areas.

### 7.4.10 Land Use and Planning

The No Project/Adopted PD-1 (SEADIP) Alternative would allow for the continued development of the Project area that would not require amendments to the City's General Plan, SEADIP, and local coastal plan (LCP). The land uses and intensity of development would be consistent with local and regional planning documents as well as the surrounding area. However, this alternative would not meet the goals of the City's General Plan to the same degree as the proposed Project. For example, the proposed Project directs new development away from wetlands and natural resources and toward urbanized, developed areas and provides a Wetland Monitoring Fund to restore and maintain the wetland area, consistent with Conservation Element Goals 1, 2, 3, 13, and 22. Additionally, the proposed Specific Plan addresses design, scale, and character of the urban realm to ensure that new development is consistent with the character of Long Beach, and outlines a multimodal circulation system that is sensitive to the mobility needs of all residents, including those that walk, bicycle, and/or are transit dependent. This alternative does not meet the mobility goals of the LCP and SCAG's 2016-2040 Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS) to the same extent as the proposed Project. The proposed Project incorporates a number of bicycle and pedestrian improvements (see Section 3.5.1 of this DEIR), improving bicycle and pedestrian facilities and infrastructure throughout the Project area, consistent with the LCP's General Transportation and Access Policies and SCAG's RTP/SCS Goals G2 through G6. Overall, impacts would be slightly greater under this alternative.

### 7.4.11 Mineral Resources

Similar to the proposed Project, the No Project/Adopted PD-1 (SEADIP) Alternative would allow for continued oil operation in the Project area. Impacts to mineral resources would be less than significant and similar to the proposed Project.

### 7.4.12 Noise

The No Project/Adopted PD-1 (SEADIP) Alternative would slightly reduce short-term construction-related impacts associated with the proposed Project since there would be an overall reduction in intensity allowed at buildout. Additionally, the reduction of residential development and construction activities would also reduce potential short-term vibration impacts to sensitive receptors. However, due to the unknown number of construction activities that could occur at any one time, the proximity to sensitive receptors, longevity of activities, and specific equipment

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required, construction-related noise impacts may not be reduced to less than significant levels for some projects. Therefore, impacts would remain significant and unavoidable.

The No Project/Adopted PD-1 (SEADIP) Alternative would reduce daily vehicle trips by approximately 1 percent compared to the proposed Project. This would slightly decrease long-term noise impacts from vehicle sources. However, no significant long-term noise impacts were identified with the proposed Project. Similar to the Project, impacts would be less than significant.

Overall, this alternative would result in a slight reduction of construction-related and long-term traffic-related noise impacts.

### 7.4.13 Population and Housing

Under the No Project/Adopted PD-1 (SEADIP) Alternative, buildout would result in 1,165 additional jobs and 6,391 fewer residents. Under this alternative, the population, housing, and employment at buildout would be consistent with the City's growth projections identified in SCAG's RTP/SCS. However, growth associated with the proposed Project was also within growth projections. The No Project/Adopted PD-1 (SEADIP) Alternative would provide fewer housing units and mixed-use opportunities near a regional employment and activity center in high quality transit areas. Overall, impacts to population and housing would remain less than significant with this alternative and similar to the proposed Project.

### 7.4.14 Public Services

Under the No Project/Adopted PD-1 (SEADIP) Alternative, development would continue to occur throughout the Project area as permitted by the adopted General Plan and PD-1. Under this alternative, impacts associated with fire protection, law enforcement, schools, and library services would be less compared to the proposed Project, since there would be less residential development and fewer residents at full buildout. As with the proposed Project, impacts would be less than significant.

### 7.4.15 Recreation

Under the No Project/Adopted PD-1 (SEADIP) Alternative, development would continue to occur in accordance with the adopted General Plan and PD-1. Due to the higher level of population estimated under buildout conditions of the proposed Project, the demands on existing recreational facilities would be reduced under this alternative. As a result, less parkland would be required to serve the projected population at buildout. As with the proposed Project, all new development would be required to pay the park and recreational facilities impact fees outlined in Chapter 18.18 (Park and Recreation Facilities Fee) of the City's Municipal Code, which would be placed into the City's park fee account and used solely and exclusively for the purpose of funding future park land

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acquisition and recreation improvements. Payment of the park and recreational facilities impact fees would help offset any impacts to existing park and recreational facilities. Impacts would remain less than significant, and this alternative would reduce impacts of the proposed Project.

### 7.4.16 Transportation and Traffic

The No Project/Adopted PD-1 (SEADIP) Alternative would have similar impacts to the transportation system as the proposed Project because it generates roughly the same number of total trips, with a reduction in the AM peak hour and increase in the PM peak hour. Specifically, this alternative would generate 1 percent fewer daily trips, 6 percent fewer AM peak hour trips, and 3 percent additional PM peak hour trips.<sup>2</sup> Given the relative similarity in trip generation to the proposed Project, this alternative would result in similar impacts to the transportation system compared to the proposed Project.

However, buildout of the adopted PD-1 includes the extension of Studebaker Road through wetland areas. This extension would have the potential to reduce impacts at two intersections: 2nd Street at Shopkeeper Road and 2nd Street at Studebaker Road. Additionally, the Studebaker Road extension would reduce traffic at 2nd Street at PCH. The reduction at 2nd Street and PCH would not reduce impacts to less than significant. Overall, traffic impacts associated with this alternative would be less than the proposed Project.

### 7.4.17 Utilities and Service Systems

Under the No Project/Adopted PD-1 (SEADIP) Alternative, impacts to utilities and service systems would be reduced due to the reduction in residential units and overall intensity. This alternative would also reduce the generation of wastewater and solid waste. This alternative would require the extension of water and wastewater infrastructure into undeveloped areas. Overall, impacts would be reduced and remain less than significant.

### 7.4.18 Conclusion

#### Ability to Reduce Impacts

The No Project/Adopted PD-1 (SEADIP) Alternative would reduce impacts related to air quality, greenhouse gas emissions, noise, public services, recreation, traffic, and utilities due to the decrease in residential units and overall intensity. However, this alternative would result in greater impacts to aesthetics, biological resources, cultural resources, and hydrology and water quality due to the increased development area into previously undeveloped areas. Impacts to land use and planning

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<sup>2</sup> Trip generation was derived using EPA's mixed use trip generation methodology (see Chapter 4 of the Traffic Study in Appendix J of this DEIR).

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would also increase since the proposed Project provides greater consistency with local and regional plans adopted for the purpose of reducing environmental impacts. Impacts related to agriculture and forestry, historical resources, geology and soils, hazards and hazardous materials, mineral resources, and population and housing would be similar to the proposed Project.

### Ability to Achieve Project Objectives

Implementation of the No Project/Adopted PD-1 (SEADIP) Alternative would allow development to occur in accordance with the adopted PD-1. Therefore, the vast majority of the Project objectives would not be achieved under this alternative. Although the PD-1 provides some level of guidance for future development, it does not give equal weight to development that considers planning, environmental, and economic feasibility (Objective 1). The PD-1 does not include a flexible land use plan that provides a greater mix of uses (Objective 2). Although the PD-1 provides some level of wetland protect through development of wetland buffers and preservation requirements, it allows more development within the wetland areas and does not enhance views or creates a sense of place for the community (Objective 3). Furthermore, continuation of the adopted plan would not allow for the expansion of multimodal transportation options (Objective 4); there would be no option to increase public connectivity to open space, including the marina, other waterways, the wetlands, and parks (Objective 5); and there would be no plan for enhanced gateway and landmark locations (Objective 6).

Importantly, the No Project/Adopted PD-1 (SEADIP) Alternative would not provide any of the Project benefits that would occur with adoption of the Southeast Area Specific Plan, including enhancement of wetlands through implementation of the wetland monitoring fund (providing funds for the preservation, restoration, and maintenance of wetlands), water quality enhancement, creation of place, and revitalization in the area.

## 7.5 NO PROJECT/NO DEVELOPMENT ALTERNATIVE

This alternative assumes the proposed Project would not be implemented, which includes adoption of the Southeast Area Specific Plan. It also assumes that no new development would occur and the Project area would be considered completely built out. Therefore, all existing land uses would remain with no additional development in the future. Some minor population growth could occur within the area, to the extent that existing residential units or units that have already been approved could accommodate additional residents (e.g., a decrease in vacancy rates). None of the impacts of the proposed Specific Plan, adverse or beneficial, would result. Future conditions within the area, except for the impacts of cumulative regional growth, would generally be the same as existing conditions.

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This alternative consists of 4,079 dwelling units and 2,091,476 nonresidential square feet, resulting in a reduction of 5,439 dwelling units and 573,576 square of nonresidential square feet compared to the proposed Project. This alternative would reduce the number of residents and jobs by 8,648 people and 560 jobs compared to the proposed Project.

### 7.5.1 Aesthetics

Under the No Project/No Development Alternative, no new development would occur within the Project area. Therefore, the existing visual character and resources would remain as is; the dwelling units and commercial/employment building square footage that would occur under the proposed Project would not be developed. However, the various visual improvements that would be introduced throughout the Project area under the proposed Specific Plan (e.g., enhanced views, landscaping, building form and architectural design, and view preservation) would not occur under this alternative. For example, creating a block structure in the Mixed Use – Community Core MU-CC would visually enhance the area by providing views to the wetlands and marina. The proposed Project is intended to create a plan that would provide a greater mix of uses, expand multimodal transportation, and create a sense of place. Additionally, the proposed Project's aesthetic and visual resource impacts were determined to be less than significant. Therefore, aesthetic impacts under this alternative would be greater compared to the proposed Project.

### 7.5.2 Agriculture and Forestry Resources

Similar to the proposed Project, no impacts to agricultural and forestry resources would occur under the No Project/No Development Alternative.

### 7.5.3 Air Quality

Under this alternative, no new development would occur, and no new construction or demolition activities would occur. Therefore, the proposed Project's significant and unavoidable construction-related emissions impact would be eliminated compared to the proposed Project.

Since the No Project/No Development Alternative would not increase traffic, associated air emissions would remain as is and less than the proposed Project. Therefore, significant and unavoidable operational air quality impacts would be reduced. Overall, air quality impacts under this alternative would be reduced compared to the proposed Project.

### 7.5.4 Biological Impacts

The No Project/No Development Alternative would not result in any new development, and direct impacts to biological resources would be reduced. However, existing development adjacent to the wetlands would continue to operate as is—in some instances, allowing untreated stormwater runoff

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to flow directly into the wetland and nearby habitats. This alternative would not allow for the development of wetland buffers or the wetland monitoring fund, which would serve to preserve, restore, and maintain the wetlands, as provided in the proposed Specific Plan. Therefore, impacts would be greater compared to the proposed Project.

### 7.5.5 Cultural Resources

Under the No Project/No Development Alternative, no new development would occur within the Project Site; this alternative would not result in the potential to encounter paleontological, archaeological, or tribal cultural resources during grading activities. Since no redevelopment would occur, there would be no potential to demolish an unknown historical resource. Therefore, significant and unavoidable historical resources impacts under this alternative would be eliminated under this alternative.

### 7.5.6 Geology and Soils

No new construction activities, including demolition and grading, would occur under the No Project/No Development Alternative. Therefore, there would be no potential for additional residents, workers, buildings, and structures to experience seismic ground shaking, liquefaction, subsidence, or expansion throughout the Project area. However, it should be noted that the proposed Project's impacts to geology and soils were determined to be less than significant. Geologic hazards impacts of this alternative would be less than the proposed Project and less than significant.

### 7.5.7 Greenhouse Gas Emissions

The No Project/No Development Alternative assumes the Project area is completely built out and no new development would occur. While the proposed Project would encourage alternative modes of travel through the creation of pedestrian and bicycle improvements and by adding mixed use, it would also allow for substantial development that would generate greater amounts of greenhouse gas (GHG) emissions than existing conditions. This alternative would result in a reduction of GHG emissions; however, the recent long-term GHG reduction goals under Executive Orders S-3-05 and B-30-15 would still not be met without major advancements in technology. Therefore, impacts under this alternative would be reduced compared to the proposed Project but still remain significant and unavoidable.

### 7.5.8 Hazards and Hazardous Materials

Under this alternative, the Project area is assumed to be completely built out and no new development would occur. There would be no new potential to expose the public to hazardous materials through routine transport and use or through a possible accident to release of hazardous

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materials that could occur during the construction and operational phases of the proposed Project. Additionally, the potential for asbestos-containing materials and lead-based paint to be released during the demolition of buildings and structures under the proposed Project would not occur, since no new development would occur under this alternative. Furthermore, existing hazardous emissions or uses would remain as is and would be required to continue complying with existing state and local regulations. Therefore, impacts of this alternative would be reduced compared to the proposed Project.

### 7.5.9 Hydrology and Water Quality

Existing water quality conditions, groundwater supplies, drainage patterns, and runoff water amounts would remain as is under this alternative since no new development would occur. This alternative would not introduce new sources of water pollutants (from either construction or operations phases of development projects) to the Project area. Additionally, this alternative would not require the storm drain facility improvements that would be required under the proposed Project. However, this alternative would not include the development of new LID, source control, site design, and treatment control best management practices (BMPs) to minimize runoff and water pollution, which would occur under the proposed Project. These required measures have a beneficial impact on stormwater quality. Overall, hydrology and water quality impacts would be slightly greater under this alternative and less than significant.

### 7.5.10 Land Use and Planning

Given that the proposed Specific Plan would not be adopted, this alternative would not require a general plan amendment, zone change, or LCP amendment. The existing PD-1 designation of the Project area would remain. However, this alternative would not provide a catalyst for development, create a sense of place, or provide community amenities. New development standards and design guidelines to enhance the character, mobility, and streetscape of the Project area would also not be implemented. Additionally, the proposed Project's impacts to land use and planning were determined to be less than significant. Overall, land use impacts of the No Project/No Development Alternative compared to the proposed Project would be similar to those of the proposed Project and less than significant.

### 7.5.11 Mineral Resources

Similar to the proposed Project, the No Project/No Development Alternative would allow for continued oil operation in the Project area. Impacts to mineral resources would be less than significant.

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### 7.5.12 Noise

Under this alternative, no new development would occur. Therefore, this alternative would eliminate the proposed Project's significant and unavoidable noise impacts related to construction activities. Additionally, no new operational noises would be generated given that no development would occur under this alternative. Therefore, impacts would be reduced under this alternative as compared to the proposed Project.

### 7.5.13 Population and Housing

Population growth would not occur under the No Project/No Development Alternative because no new homes, businesses, roads, or other infrastructure would be proposed. Population in the Project area would remain as is under this alternative, resulting in no impact to population and housing. However, the proposed Project's impacts to population and housing were determined to be less than significant. Nonetheless, population and housing impacts would be reduced under this alternative compared to the proposed Project.

### 7.5.14 Public Services

Existing population, housing, commercial/employment use, and workers in the Project Site would remain under this alternative. Therefore, there would be no increase in demand for fire protection, police protection, schools, parks, or libraries. However, the proposed Project's impacts to public services were determined to be less than significant. Nonetheless, public services impacts would be reduced under this alternative compared to the proposed Project.

### 7.5.15 Recreation

Under the No Project/No Development Alternative, no new residents or employees would be introduced to the Project area, which would reduce impacts resulting from additional demand on parks and recreational facilities in the City. However, the proposed Project's impacts on parks and recreational facilities were determined to be less than significant. Overall, impacts to parks and recreational facilities would be slightly reduced under this alternative compared to the proposed Project.

### 7.5.16 Transportation and Traffic

Under the No Project/No Development Alternative, no new housing units, residents, employees, or commercial/employment uses would be introduced into the Project Site. Existing daily trips would remain similar to current conditions, and all roadway segments and intersections would maintain existing levels of service. As detailed in Section 5.16, *Transportation and Traffic*, Table 5.16-2, six

## 7. Alternatives to the Proposed Project

intersections operate at a deficient LOS during one or more peak hours under existing without Project (No Project/No Development Alternative) conditions:

- Studebaker Road & SR-22 Westbound Ramps: PM Peak Hour (LOS F)
- 7th Street & Ximeno Avenue: PM Peak Hour (LOS E)
- Pacific Coast Highway & 7th Street: AM Peak Hour (LOS D), PM Peak Hour (LOS E)
- Channel Drive & 7th Street: PM Peak Hour (LOS E)
- Pacific Coast Highway & Loynes Drive: PM Peak Hour (LOS D)
- Pacific Coast Highway & 2nd Street: AM Peak Hour (LOS E), PM Peak Hour (LOS E)

Three freeway segments, off-ramps, and on-ramps operate at a deficient LOS during the peak hours under existing without Project conditions (see Table 5.16-4):

- Westbound SR-22: AM Peak Hour (LOS D), PM Peak Hour (LOS E)
- Studebaker On-Ramp: AM Peak Hour (LOS D), PM Peak Hour (LOS D)
- Eastbound SR-22: AM Peak Hour (LOS D), PM Peak Hour (LOS D)

The Existing with Project (proposed Project) would result in a significant impact at all six intersections identified above and three additional intersections. This alternative would reduce significant impacts at Bellflower Blvd. & 7th Street, Shopkeeper & 2nd Street, and Westminster and Seal Beach Blvd. This alternative would reduce significant impacts for Cumulative Year (2035) Conditions for the following five intersections:

- Studebaker Rd & SR-22 Eastbound Ramps (Caltrans): PM Peak Hour (LOS D)
- Studebaker Road & Loynes Drive: PM Peak Hour (LOS E)
- Marina Drive & 2nd Street: PM Peak Hour (LOS E)
- Shopkeeper Road & 2nd Street: PM Peak Hour (LOS F)
- Studebaker Road & 2nd Street: PM Peak Hour (LOS E)

Under the proposed Project, impacts to these intersections would be significant and unavoidable. Therefore, this alternative would reduce traffic impacts and eliminate significant unavoidable impacts at eight intersection locations.

Additionally, this alternative would not include pedestrian and bicycle improvements that would alleviate existing traffic deficiencies.

### 7.5.17 Utilities and Service Systems

No new development and population increase under this alternative would mean that existing water supply demand in the Project area would remain the same, and wastewater and solid waste would

## 7. Alternatives to the Proposed Project

also remain the same. In comparison, the proposed Project would introduce 5,439 dwelling units and 573,576 square feet of commercial/employment uses, which would substantially increase water supply demands, and also increase wastewater and solid waste generation. Therefore, impacts to utilities and service system would be reduced under this alternative and would be less than significant.

### 7.5.18 Conclusion

#### Ability to Reduce Impacts

The No Project/No Development Alternative would reduce impacts to air quality (operation), cultural resources, geology and soils, greenhouse gas emissions, hazards and hazardous materials, noise (operation), population and housing, public services, recreation, transportation and traffic, and utilities and service systems. Additionally, significant and unavoidable impacts associated with construction-related air quality and noise impacts, historical resources, and traffic (eight intersections) would be eliminated under this alternative. However, impacts related to aesthetics, biological resources, and hydrology and water quality would be increased.

#### Ability to Achieve Project Objectives

Implementation of the No Project/No Development Alternative would ultimately stop any new development from occurring within the Project area beyond what is already on the ground. Therefore, none of the Project objectives would be achieved under this alternative. There would be no guiding plan for development that considers planning, environmental, and economic feasibility (Objective 1); there would be no resource preservation or the ability to provide a greater mix of uses (Objective 2); there would be no standards and guidelines to encourage development that respects the wetlands, protects views, and creates a sense of place (Objective 3); there would be no expansion of multimodal transportation options (Objective 4); there would be no option to increase public connectivity to open space, including the marina, other waterways, the wetlands, and parks (Objective 5); and there would be no plan for enhanced gateway and landmark locations (Objective 6).

Importantly, the No Project/No Development Alternative would not provide any of the Project benefits that would occur with adoption of the Specific Plan, including enhancement of wetlands through implementation of the wetland monitoring fund (providing funds for the preservation, restoration, and maintenance of wetlands), water quality enhancement, creation of place, and revitalization in the area.

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### 7.6 REDUCED INTENSITY ALTERNATIVE

The Reduced Intensity Alternative was analyzed to reduce environmental impacts related to air quality, greenhouse gas emissions, noise, and traffic. In order to make a significant reduction to traffic impacts within the Project area, the proposed Project would need to be reduced below existing conditions. Therefore, the Reduced Intensity Alternative would reduce residential development intensity by 30 percent and nonresidential development intensity by 10 percent. This alternative would reduce the number of hotel units to 375 rooms.

#### 7.6.1 Aesthetics

Impacts associated with the Reduced Intensity Alternative would be similar to the proposed Project because it would result in a similar development area and would require compliance with the provisions of the proposed Specific Plan. Although buildout intensity would be reduced, heights, setbacks, building forms, and other development standards and design guidelines would still apply. Therefore, impacts would be similar to the proposed Project.

#### 7.6.2 Agriculture and Forestry Resources

Similar to the proposed Project, no impacts to agricultural and forestry resources would occur under the Reduced Intensity Alternative.

#### 7.6.3 Air Quality

The Reduced Intensity Alternative would modify the proposed land uses by reducing the residential units by 2,855 and nonresidential square footage by 266,505. A reduction in overall development would reduce short-term emissions related to Project construction activities. However, it would not eliminate significant long- and short-term criteria pollutant contributions of volatile organic compounds (VOC), nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), sulfur dioxide (SO<sub>2</sub>), and coarse and fine particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>).

This alternative would have fewer vehicle trips, resulting in a reduction in mobile source emissions. However, similar to the proposed Project, this alternative would not be consistent with the air quality management plan because criteria pollutants thresholds would be exceeded, and it would cumulatively contribute to the SoCAB nonattainment designations for ozone (O<sub>3</sub>), PM<sub>10</sub>, and PM<sub>2.5</sub>. Implementation of the proposed Specific Plan was found to have significant and unavoidable impacts to long- and short-term air quality. This alternative would slightly reduce air quality impacts, but would not eliminate any significant impacts.

## 7. Alternatives to the Proposed Project

### 7.6.4 Biological Impacts

The Reduced Intensity Alternative would result in similar impacts to biological resources, since the development area would be the same and development would be directed away from the wetland areas and toward urbanized areas of the plan. The reduction in development intensity would reduce the amount of fees that could be placed within the proposed wetland monitoring fund that would be established for the preservation, restoration, and maintenance of the wetlands. However, the reduction in building intensity would result in less population in the area, which could decrease indirect impacts, such as conflicts between the urban and wetland interface. Overall, biological resources impacts of this alternative would be similar to the proposed Project.

### 7.6.5 Cultural Resources

Similar to the proposed Project, implementation of the Reduced Intensity Alternative could uncover cultural resources during grading. This alternative would have the same development area. Impacts related to historical resources would be the same as the proposed Project. Overall, impacts would be similar.

### 7.6.6 Geology and Soils

The development area under the Reduced Intensity Alternative would be the same as the proposed Project, and geotechnical conditions would be the same. New development under the alternative and the proposed Project would be required to avoid placing structures within 50 feet of the Newport-Inglewood Fault Zone and meet CBC requirements to safeguard against major structural failures or loss of life caused by earthquakes and other geologic hazards. Both scenarios would be subject to similar soil conditions and hazards—such as liquefaction, subsidence, collapsible soils, or expansive soils. Impacts would be similar to the proposed Project.

### 7.6.7 Greenhouse Gas Emissions

As stated above, the Reduced Intensity Alternative would result in a reduction of residential dwelling units and nonresidential square footage and would decrease vehicle trips. Therefore, this alternative would result in a reduction in construction and operational GHG emissions. Impacts from this alternative would still be significant and unavoidable, since additional statewide measures would be necessary to reduce GHG emissions to meet the long-term GHG reduction goals under Executive Order S-03-05 (goal to reduce GHG emissions to 80 percent of 1990 levels by 2050) and Executive Order B-30-15 (identify goal to reduce GHG emissions for 2030). Currently, there is no plan past 2020 that achieves the long-term GHG reduction goal established under Executive Order S-03-05 or the new Executive Order B-30-15. As identified by the California Council on Science and Technology, the state cannot meet the 2050 goal without major advancements in technology (CCST

## 7. Alternatives to the Proposed Project

2012). Since no additional statewide measures are currently available, impacts would remain significant and unavoidable.

### 7.6.8 Hazards and Hazardous Materials

Similar to the proposed Project, buildout of the Reduced Intensity Alternative would involve the use of hazardous materials during construction and could expose construction workers to hazardous materials during demolition from asbestos-containing materials or grading from contaminated soils. However, construction materials such as fuels, paints, and solvents would be used in limited quantities and would not pose a significant safety hazard. Any remediation and or demolition would be required to comply with the appropriate state standards, guidelines, and responsible agency (DTSC, RWQCB, Lbfd).

Similar to the proposed Project, new development is not expected to involve the use of large amounts of hazardous materials. Hazards to the public or the environment arising from the routine use, storage, transport, and disposal of hazardous materials during operation of this alternative would not occur. Impacts would be similar to the proposed Project.

### 7.6.9 Hydrology and Water Quality

Under the Reduced Intensity Alternative, there would be a reduction in new development. New development replacing the existing urban uses would reduce impervious surfaces, but slightly less than the proposed Project. Similar to the proposed Project, this alternative would result in reduced impacts to the existing storm drain system as compared to the proposed Project, because the Project would decrease the amount of impervious surfaces and associated stormwater flow.

Similar to the proposed Project, the Reduced Intensity Alternative would not result in new development or structures within a 100-year flood zone. Additionally, flood hazards due to seiche, mudflow, and tsunami flood hazards would be similar to the proposed Project.

The Reduced Intensity Alternative would be required to implement water quality measures to reduce impacts during construction and operation. Under either scenario, compliance with water quality regulations would reduce water quality impacts to less than significant. The Reduced Intensity Alternative would result in similar impacts as the proposed Project.

### 7.6.10 Land Use and Planning

The Reduced Intensity Alternative would allow for a similar mix of land uses with less development intensity than the proposed Project. This alternative would require amendments to the City's General Plan, SEADIP, and LCP. Similar to the proposed Project, this alternative would be

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consistent with the goals and policies of the City's General Plan, LCP, and SCAG's 2016-2040 RTP/SCS and result in similar impacts as the proposed Project.

### 7.6.11 Mineral Resources

Similar to the proposed Project, the Reduced Intensity Alternative would allow for continued oil operation in the Project area. Impacts to mineral resources would be less than significant and similar to the proposed Project.

### 7.6.12 Noise

The Reduced Intensity Alternative would slightly reduce short-term construction-related impacts associated with the proposed Project since there would be an reduction in dwelling units and square footage allowed at buildout. Additionally, the reduction of residential development and construction activities would also reduce potential short-term vibration impacts to sensitive receptors. However, due to the unknown number of construction activities that could occur at any one time, the proximity to sensitive receptors, longevity of activities, and specific equipment required, construction-related noise impacts may not be reduced to less than significant levels for some projects. Therefore, impacts would remain significant and unavoidable.

The Reduced Intensity Alternative would reduce daily vehicle trips compared to the proposed Project. This would slightly decrease long-term noise impacts from vehicle sources. However, no significant long-term noise impacts were identified with the proposed Project. Similar to the Project, impacts would be less than significant.

Overall, this alternative would result in a slight reduction of construction-related and long-term traffic-related noise impacts.

### 7.6.13 Population and Housing

Under the Reduced Intensity Alternative, buildout would result in 411 fewer jobs and 4,540 fewer residents. Under this alternative, the population, housing, and employment at buildout would be consistent with the City's growth projections identified in SCAG's RTP/SCS. However, growth associated with the proposed Project was also within growth projections. The Reduced Intensity Alternative would provide fewer housing units and mixed-use opportunities near a regional employment and activity center in high quality transit areas. Overall, impacts to population and housing would remain less than significant with this alternative and similar to the proposed Project.

## 7. Alternatives to the Proposed Project

### 7.6.14 Public Services

Under the Reduced Intensity Alternative, residential development would be reduced by 30 percent and nonresidential development would be reduced by 10 percent. This would result in a corresponding reduction in demands placed on public services, including fire protection, law enforcement, schools, and library services. Impacts would be less compared to the proposed Project since there would be less residential development and fewer residents at full buildout. As with the proposed Project, impacts would be less than significant.

### 7.6.15 Recreation

Under the Reduced Intensity Alternative, the demands on existing recreational facilities would be reduced due to the reduction in overall population. Less parkland would be required to serve the projected population at buildout. As with the proposed Project, all new development would be required to pay the park and recreational facilities impact fees outlined in Chapter 18.18 (Park and Recreation Facilities Fee) of the City's Municipal Code, which would be placed into the City's park fee account and used solely and exclusively for the purpose of funding future park land acquisition and recreation improvements. Payment of the park and recreational facilities impact fees would help offset any impacts to existing park and recreational facilities. Impacts would remain less than significant, and this alternative would reduce impacts of the proposed Project.

### 7.6.16 Transportation and Traffic

The Reduced Intensity Alternative would reduce impacts to the transportation system by reducing the number of vehicle trips. Vehicle trip generation would be reduced by approximately 16 percent during the day, 18 percent during the AM peak hour, and 6 percent during the PM peak hour, as compared to the proposed Project.<sup>3</sup> This alternative could reduce the Project's impact at the intersection of Westminster Boulevard at Seal Beach Boulevard in the City of Seal Beach to less than significant. This would eliminate one significant unavoidable adverse impact. However, all other identified impacts would likely remain under this alternative.

### 7.6.17 Utilities and Service Systems

Under the Reduced Intensity Alternative, impacts to utilities and service systems would be reduced due to the reduction in residential and nonresidential intensity. This alternative would also reduce the generation of wastewater and solid waste. This alternative would require the extension of water and wastewater infrastructure into undeveloped areas. Overall, impacts would be reduced and remain less than significant.

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<sup>3</sup> Trip generation was derived using EPA's mixed use trip generation methodology (see Chapter 4 of the Traffic Study in Appendix J of this DEIR).

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### 7.6.18 Conclusion

#### Ability to Reduce Impacts

The Reduced Intensity Alternative would reduce impacts associated with air quality, greenhouse gas emissions, noise, public services, recreation, traffic, and utilities compared to the proposed Project. This alternative would eliminate one significant and unavoidable traffic impact. Impacts related to aesthetics, agriculture and forestry, biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, and population and housing would remain the same as the proposed Project since it would involve the same mix of land uses and development area. This alternative would not increase impacts for any environmental topical area.

#### Ability to Achieve Project Objectives

Under the Reduced Intensity Alternative, most of the proposed Project's objectives would be achieved but to a lesser extent as compared to the proposed Project. For example, the reduction in development capacity under this alternative would not be consistent with the ideas and plans presented in the proposed Project, which were generated through close coordination with existing residents, businesses, property owners, and development communities to create a sustainable, feasible, and effective plan that equally considers social (community amenities), environmental, and economic benefits (Objective 1). This alternative would not provide a greater mix of uses to the same extent as the proposed Project (Objective 2). This alternative could meet Objectives 3 through 6 relating to guideline future development, expanding multimodal transportation, providing increased connectivity to open space, and identifying gateway and landmark locations to a lesser extent than the Project.

## 7.7 REDUCED BUILDING HEIGHT ALTERNATIVE

The Reduced Building Height Alternative proposes a maximum of five stories in the MU-CC land uses (and MU-Marina), except under specific conditions, as outlined in Table 5-4 of the Specific Plan. Additional height may be considered for hotel or residential uses up to seven stories in the MU-CC, if it is shown that significant community amenities are provided. This alternative would eliminate this exception and require a maximum building height of five stories in this area. This alternative assumes the same buildout calculations as the proposed Project.

### 7.7.1 Aesthetics

Impacts associated with the Reduced Building Height Alternative would be slightly less than the proposed Project due to the reduced building height. The proposed MU-CC area would have a maximum building height of five stories, creating slightly less impact for long-distance views of this

## 7. Alternatives to the Proposed Project

area from Naples and people traveling east on 2nd Street. However, it should be noted that the proposed Project would not have a significant impact on viewsheds or degrade the existing visual quality and character of the Project area.

Similar to the proposed Project, this alternative would be required to comply with development standards and design guidelines, which would enhance the visual character and quality of the Project area and create view corridors. Impacts related to light and glare would also be substantially the same as the proposed Project.

Overall, impacts related to aesthetics would be slightly reduced.

### 7.7.2 Agriculture and Forestry Resources

Similar to the proposed Project, there would be no impacts to agriculture and forestry resources.

### 7.7.3 Air Quality

This alternative assumes the same buildout calculations as the proposed Project. Therefore, impacts related to air quality would be the same as the proposed Project and significant and unavoidable.

### 7.7.4 Biological Impacts

The Reduced Building Height Alternative's impact on biological resources would be similar to the proposed Project because the proposed land uses and development area would remain the same. This alternative would also be required to incorporate Bird-Safe Treatments detailed in the Specific Plan to reduce impacts related to bird strikes. However, as described in Section 5.4 of this DEIR, about 90 percent of bird strikes with buildings occur within the first 40 feet in building height. The reduction of building height from a maximum of seven stories to five stories is not expected to result in a significant change in bird strike hazards from the proposed Project, since both types of buildings would exceed 40 feet in height. Additionally, seven-story buildings are intended to be an exception to the building massing and cannot exceed 20 percent of the total acres in the MU-CC similar to the proposed Project.

### 7.7.5 Cultural Resources

The Reduced Building Height Alternative's impact on cultural resources would be the same as the proposed Project because the proposed development area and building intensity would remain the same.

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### 7.7.6 Geology and Soils

The Reduced Building Height Alternative's impact on geology and soils would be the same as the proposed Project because the proposed land uses and development area would remain the same.

### 7.7.7 Greenhouse Gas Emissions

This alternative assumes the same buildout calculations as the proposed Project. Therefore, impacts related to greenhouse gas emissions would be the same as the proposed Project.

### 7.7.8 Hazards and Hazardous Materials

The Reduced Building Height Alternative's impact on hazards and hazardous materials would be the same as the proposed Project because the proposed land uses and development area would remain the same.

### 7.7.9 Hydrology and Water Quality

The Reduced Building Height Alternative's impact on hydrology and water quality would be the same as the proposed Project because the proposed land uses, buildout intensity, and development area would remain the same.

### 7.7.10 Land Use and Planning

The Reduced Building Height Alternative would allow for a similar mix of land uses with the same development intensity as the proposed Project. This alternative would still require amendments to the City's General Plan, SEADIP, and LCP. Similar to the proposed Project, this alternative would be consistent with the goals and policies of the City's General Plan and SCAG's 2016-2040 RTP/SCS.

### 7.7.11 Mineral Resources

Similar to the proposed Project, there would be less than significant impacts to mineral resources.

### 7.7.12 Noise

This alternative assumes the same buildout calculations as the proposed Project. Therefore, impacts related to noise would be the same as the proposed Project.

### 7.7.13 Population and Housing

This alternative assumes the same buildout calculations as the proposed Project. This alternative could result in a reduction in housing units or hotel rooms by removing an incentive to allow an increased building height. However, this change would not result in a substantial change in impacts

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related to population and housing. Therefore, impacts related to population and housing would be similar to the proposed Project.

### 7.7.14 Public Services

This alternative assumes the same land uses and buildout calculations as the proposed Project. Therefore, impacts related to public services would be similar to the proposed Project.

### 7.7.15 Recreation

This alternative assumes the same land uses and buildout calculations as the proposed Project. Therefore, impacts related to recreation would be similar to the proposed Project.

### 7.7.16 Transportation and Traffic

This alternative assumes the same buildout calculations as the proposed Project. Therefore, impacts related to traffic would be similar to the proposed Project.

### 7.7.17 Utilities and Service Systems

This alternative assumes the same buildout calculations as the proposed Project. Therefore, impacts related to utilities and service systems would be similar to the proposed Project.

### 7.7.18 Conclusion

#### Ability to Reduce Impacts

The Reduced Building Height Alternative would slightly reduce impacts related to aesthetics. Impacts relating to all other environmental topics would be the same as or similar to the proposed Project. This alternative would not reduce or eliminate any significant unavoidable adverse impacts of the proposed Project.

#### Ability to Achieve Project Objectives

Implementation of the Reduced Building Height Alternative would meet most of the Project objectives. However, this alternative may provide less incentive to develop residential or hotel uses providing a less flexible land use plan (Objective 2) compared to the proposed Project.

## 7.8 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, an environmentally superior development alternative must be identified. Table 7-2 summarizes the

## 7. Alternatives to the Proposed Project

impacts for the alternatives and how they compare to the proposed Project. The No Project/No Development is environmentally superior to the proposed Project because it results in the elimination of four significant unavoidable adverse impacts: Air Quality (construction), Historical Resources, Noise (Construction), and Transportation/Traffic.

Since the environmentally superior alternative is a no project alternative, a development alternative was selected, as required by CEQA. One alternative has been identified as “environmentally superior” to the proposed Project:

- Reduced Intensity Alternative

Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts” (Guidelines Sec. 15126.6[c]).

The Reduced Intensity Alternative has been identified as the environmentally superior alternative. This alternative would reduce impacts associated with air quality, greenhouse gas emissions, noise, public services, recreation, traffic, and utilities compared to the proposed Project. This alternative would eliminate one significant and unavoidable traffic impact. Impacts related to aesthetics, agriculture and forestry, biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, and population and housing would remain the same as the proposed Project since it would involve the same mix of land uses and development area. This alternative would not increase impacts for any environmental topical area.

As stated above, under the Reduced Intensity Alternative, most of the proposed Project’s objectives would be achieved but to a lesser extent as compared to the proposed Project. For example, the reduction in development capacity under this alternative would not be consistent with the ideas and plans presented in the proposed Project, which were generated through close coordination with existing residents, businesses, property owners, and development communities to create a sustainable, feasible, and effective plan that equally considers social (community amenities), environmental, and economic benefits (Objective 1). This alternative would not provide a greater mix of uses to the same extent as the proposed Project (Objective 2). This alternative could meet Objectives 3 through 6 relating to guideline future development, expanding multimodal transportation, providing increased connectivity to open space, and identifying gateway and landmark locations to a slightly lesser extent than the Project.

7. Alternatives to the Proposed Project

**Table 7-2 Summary of Impacts of Alternatives Compared to the Proposed Project**

Topic	Proposed Project	No Project/ Adopted PD-1 (SEADIP)	No Project/ No Development	Reduced Intensity	Reduced Building Height
Aesthetics	LTS	(+)	(+)	(=)	(-)
Agriculture and Forestry Resources	LTS	(=)	(=)	(=)	(=)
Air Quality					
<i>Construction</i>	<b>SU</b>	(-)	(-)*	(-)	(=)
<i>Operation</i>	<b>SU</b>	(-)	(-)	(-)	(=)
Biological Resources	LTS/M	(+)	(+)	(=)	(=)
Cultural Resources	LTS/M	(+)	(-)	(=)	(=)
Historical Resources	<b>SU</b>	(=)	(-)*	(=)	(=)
Geology and Soils	LTS	(=)	(-)	(=)	(=)
Greenhouse Gas Emissions	<b>SU</b>	(-)	(-)	(-)	(=)
Hazards and Hazardous Materials	LTS/M	(=)	(-)	(=)	(=)
Hydrology and Water Quality	LTS	(+)	(+)	(=)	(=)
Land Use and Planning	LTS	(+)	(=)	(=)	(=)
Mineral Resources	LTS	(=)	(=)	(=)	(=)
Noise					
<i>Construction</i>	<b>SU</b>	(-)	(-)*	(-)	(=)
<i>Operation</i>	LTS	(-)	(-)	(-)	(=)
Population and Housing	LTS	(=)	(-)	(=)	(=)
Public Services	LTS	(-)	(-)	(-)	(=)
Recreation	LTS	(-)	(-)	(-)	(=)
Transportation/Traffic	<b>SU</b>	(-)	(-)*	(-)*	(=)
Utilities and Service Systems	LTS	(-)	(-)	(-)	(=)

Notes: LTS: Less than Significant; LTS/M: Less than Significant with Mitigation Incorporated; SU: Significant and Unavoidable

(-) The alternative would result in less of an impact than the proposed Project.

(+) The alternative would result in greater impacts than the proposed Project.

(=) The alternative would result in the same/similar impacts as the proposed Project.

\* Indicates elimination of a significant and unavoidable impact.

## 7. Alternatives to the Proposed Project

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