

5.0 ALTERNATIVES

5.1 INTRODUCTION

Section 15126.6(a) of the *California Environmental Quality Act (CEQA) Statute & Guidelines (State CEQA Guidelines)*, Section 15126.6) requires that an Environmental Impact Report (EIR) include a discussion of a reasonable range of 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 does not require an EIR to consider every conceivable alternative to a project, but rather it must consider a range of feasible alternatives that would assist decision-makers and the public in evaluating the comparative merits of alternatives to a proposed project. Therefore, this chapter identifies potential alternatives to the proposed General Plan Land Use and Urban Design Elements Project (proposed project) and evaluates them as required by CEQA.

Key provisions of the *State CEQA Guidelines* on alternatives (Section 15126.6[b] 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 that 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 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 the “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. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision-making. 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]).

- 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]).
- If the lead agency concludes that no feasible alternative locations exist, it must disclose the reasons for this conclusion and should include the reasons in the EIR. For example, in some cases there may be no feasible alternative locations for a geothermal plant or mining project, which must be in close proximity to natural resources at a given location (15126.6[f][2][B]).
- An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative (15126.6[f][3]).

5.2 SELECTION OF ALTERNATIVES

Section 21100 of the Public Resources Code and Section 15126.6 of the *State CEQA Guidelines* require an EIR to identify and discuss a No Project Alternative and a reasonable range of alternatives to the proposed project that would feasibly attain most of the basic objectives of the proposed project and that would avoid or substantially lessen any of the significant environmental impacts. Based on the criteria listed above, the No Project Alternative and the Reduced Project Alternative have been selected to avoid or substantially lessen the significant impacts of the proposed project. Therefore, the alternatives considered in this Recirculated Draft EIR include the following:

- **Alternative 1: No Project Alternative.** This alternative would involve no amendments to the City of Long Beach's (City) General Plan, no adoption of PlaceTypes, and no changes to the existing land use designations in the City's planning documents. The existing General Plan Land Use Element (LUE) and the Scenic Routes Element (SRE) would continue to determine land uses and design principles that guide future development in the City.
- **Alternative 2: Reduced Project Alternative.** This alternative would include the same PlaceTypes as the proposed project, but would reduce the intensity of land uses throughout the City by 25 percent.

Table 5.A provides a summary of the anticipated impacts and feasibility of each alternative. A complete discussion of each alternative is provided below.

Table 5.A: Summary of Project Alternatives

Alternative	Description	Basis for Selection and Summary Analysis
Proposed Project	<ul style="list-style-type: none"> • Approximately 50-square-mile planning area • Updated Land Use Element (LUE) • New Urban Design Element (UDE) • 14 PlaceTypes • 2040 General Plan Anticipated Build Out: <ul style="list-style-type: none"> ○ Population increase of 18,230 persons ○ Employment increase of 28,511 jobs ○ Net increase of 28,524 units,¹ including 21,476 units to address existing overcrowding conditions <ul style="list-style-type: none"> ▪ 1,274 single-family units ▪ 27,250 multi-family units ○ Increase of 13,542,617 sf of non-residential uses 	<ul style="list-style-type: none"> • Meets all Project Objectives • Requires General Plan Update/Amendment, along with future Local Coastal Plan Amendment and Zoning Amendment for consistency with existing planning and policy documents • Refer to Chapters 3.0 and 4.0 of this Recirculated Draft EIR
Alternative 1: No Project Alternative	<ul style="list-style-type: none"> • Continuation of the City's existing General Plan LUE and SRE • Does not provide housing to reduce existing overcrowding conditions and is not anticipated to be able to facilitate the same number of units required to meet the City's Regional Housing Needs Assessment (RHNA) requirements 	<ul style="list-style-type: none"> • Required by CEQA • Does not require General Plan Update/Amendment, Local Coastal Plan Amendment, or Zoning Amendment • Inconsistent with a majority of the Project Objectives
Alternative 2: Reduced Project Alternative	<ul style="list-style-type: none"> • Approximately 50-square-mile planning area • New LUE • New UDE • 14 PlaceTypes • Reduces development potential throughout the City by 25 percent as compared to the proposed project 	<ul style="list-style-type: none"> • Requires General Plan Update/Amendment, along with future Local Coastal Plan Amendment and Zoning Amendment for consistency with existing planning and policy documents • Reduced air quality, GHG, and traffic impacts due to reductions in land use intensity • Results in fewer trips; increases peak-hour VMT due to a reduction in land use efficiency (less residential close to transit rich areas) associated with the overall development reductions; and lowers off-peak hour VMT due to an increase in shared discretionary trips associated with an increase in overcrowded units resulting from the reduction in development potential. • Consistent with some of the Project Objectives

Source: LSA (May 2019).

¹ Of the 28,524 new units, a total of 13,403 new housing units are already accommodated in recently approved specific plans (e.g., the Downtown Plan, the Midtown Specific Plan, and the Southeast Area Specific Plan).

GHG = greenhouse gas

sf = square foot/square feet

SRE = Scenic Routes Element

VMT = vehicle miles traveled

For each alternative, the analysis provides the following:

- Description of the alternative;
- Environmental analysis of the potential impacts of the alternative and the significance of those impacts (per the *State CEQA Guidelines*, significant effects of an alternative shall be discussed but in less detail than those of the proposed project);
- Overview of the potential impacts of the alternative and the significance of those impacts; and
- Summary comparison of the alternative relative to the proposed project's impacts, specifically addressing whether the alternative would meet the project's objectives; whether it would eliminate or reduce impacts compared to the project; and its other comparative merits.

5.3 ALTERNATIVES INITIALLY CONSIDERED BUT REJECTED FROM FURTHER CONSIDERATION

The following is a discussion of the development alternatives considered during the environmental review process and the reasons they were not selected for detailed analysis in this Recirculated Draft EIR.

5.3.1 Alternative Sites Considered

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 impacts of the project. The key question and first step in the analysis is whether any of the significant impacts of the project would be avoided or substantially lessened by relocating the project. Only developments or locations that would avoid or substantially lessen any of the significant impacts of the project need be considered for inclusion in the EIR (*State CEQA Guidelines*, Section 15126.6[f][2][A]). If it is determined that no feasible alternative locations exist, the EIR must disclose the reasons for this conclusion (*State CEQA Guidelines*, Section 15126.6[f][2][B]). The proposed project is the implementation of an updated General Plan LUE and a new Urban Design Element (UDE) for the entire planning area of the City. The proposed project encompasses the entire boundaries of the City and cannot be located on a different site. Because the City does not have jurisdiction over areas outside of its boundaries and cannot impose General Plan policies on such areas, no alternative sites were considered.

5.3.2 Reduced VMT Alternative/Transit-Oriented Alternative

In order to reduce significant and unavoidable air quality, GHG, and transportation impacts resulting from the proposed project (i.e., the anticipated General Plan build out 2040 scenario), consideration was given to an alternative that would reduce vehicle miles traveled (VMT) and trips generated as a result of project implementation. In order to meet this objective, the Reduced VMT Alternative/Transit-Oriented Alternative was considered. This alternative would implement only the Low and Moderate Transit-Oriented Development PlaceTypes. This alternative would recognize the objectives of Senate Bill 743 by reducing VMT per capita in order to improve the efficiency of the transportation network. This alternative would be an amendment to the City's existing LUE and

would be implemented as an Overlay Zone intended to focus development around existing and/or proposed transit to reduce the frequency and length of trips. Growth outside the proposed Transit-Oriented Development PlaceType/Overlay Zone would continue to be subject to the existing LUE. This alternative would not include a new UDE, but rather would amend the SRE to include design guidelines within the Transit-Oriented PlaceType/Overlay Zone (including Low and Moderate areas). Therefore, this alternative would eliminate the other 12 PlaceTypes proposed as part of the LUE. The Transit-Oriented Development PlaceType/Overlay Zone would occur in the same areas as the proposed project, along existing and/or planned transit corridors, in order to reduce the frequency and length of vehicle trips. The areas outside of the Transit-Oriented Development PlaceType/Overlay Zone would be subject to the existing LUE. This alternative would require a General Plan Update/Amendment, a Rezone Amendment, and a Specific Plan Amendment (related to the Downtown Community Plan) in order to ensure consistency with existing policy documents. A Local Coastal Plan Amendment would not be required because the Transit-Oriented Development PlaceType/Overlay Zone is not located within the Local Coastal Plan area.

The Reduced VMT Alternative/Transit-Oriented Alternative would reduce the development potential, and thereby, environmental impacts as compared to the proposed project. However, as outlined by CEQA, any alternative analyzed must balance compliance with stated Project Objectives, social and economic benefits and detriments, and the feasibility of implementing such an alternative. In consideration of the Project Objectives and the social and economic benefits of the project, it is not anticipated that this Alternative would be able to facilitate the same number of housing units required to meet the City's State-mandated housing requirements as identified as part of the Regional Housing Needs Assessment (RHNA) and the Assessment of Fair Housing (AFH). As such, this alternative would exacerbate the existing issues related to overcrowding and affordability and would cause such issues to worsen through the horizon year 2040. Furthermore, this alternative would not enable the City to meet the State's objectives of reducing VMT to the same extent as the proposed project, as it would only reduce VMT within the Transit-Oriented Development PlaceType area and would not reduce VMT citywide. For these reasons, further consideration of this alternative would not avoid or substantially lessen the significant effects of the project, would not meet Project Objectives, and would not meet the standards outlined in *State CEQA Guidelines* Section 15126.6(a) with regard to the selection of project alternatives. As such, analysis of this reduced development intensity in the Transit-Oriented Development PlaceType area was rejected from further consideration.

5.3.3 Neighborhood-Serving Centers and Corridors Commercial-Only Alternative

In order to reduce significant and unavoidable air quality, GHG, and transportation impacts resulting from the proposed project (i.e., the anticipated General Plan build out 2040 scenario), consideration was given to an alternative that included a reduced amount of development. In order to meet this objective, the Neighborhood-Serving Centers and Corridors Commercial-Only Alternative was considered. Under this alternative, the planning area would continue to be developed according to the same PlaceTypes included under the proposed project, but residential uses would be prohibited in the Neighborhood-Serving Centers and Corridors—Moderate and Low PlaceTypes. The non-residential square footage would remain the same in these PlaceTypes. Residential uses would remain permitted in the Founding and Contemporary Neighborhoods, Multi-Family Residential-Low

and Moderate, Transit-Oriented Development-Low and Moderate, Neo-Industrial, and Downtown PlaceTypes.

However, when the environmental impacts associated with this alternative were considered, none were substantially different or resulted in reduced environmental impacts as compared to the alternatives identified in Sections 5.5 and 5.6, below. Further, as outlined by CEQA, any alternative analyzed must balance compliance with stated Project Objectives, social and economic benefits and detriments, and the feasibility of implementing such an alternative. In consideration of these objectives for alternatives, it was determined that the No Project Alternative and the Areas of Major Change Alternative would result in similar, if not more significant, reductions in the environmental impacts resulting from the proposed project. As such, this reduced intensity alternative would not avoid or substantially lessen the significant effects of the project, would not meet Project Objectives, and would not meet the standards outlined in *State CEQA Guidelines* Section 15126.6(a) with regard to the selection of project alternatives. For these reasons, analysis of this alternative was rejected from further consideration.

5.4 PROPOSED PROJECT

5.4.1 Project Characteristics

As described earlier in Chapter 3.0, Project Description, the proposed project would result in an update to the City's existing General Plan. The proposed project includes the approval of both the General Plan LUE and UDE, which would replace the existing LUE and SRE.

The proposed LUE would replace the existing 1989 General Plan LUE. The proposed updated LUE would introduce the concept of "PlaceTypes," which would replace the current approach in the existing LUE of segregating property within the City through traditional land uses designations and zoning classifications. The updated LUE would establish 14 primary PlaceTypes that would divide the City into distinct neighborhoods, thus allowing for greater flexibility and a mix of compatible land uses within these areas. Each PlaceType would be defined by unique land use, form, and character-defining goals, policies, and implementation strategies tailored specifically to the particular application of that PlaceType within the City.

The existing General Plan does not currently include an UDE. The UDE would define the physical aspects of the urban environment. Specifically, the UDE aims to enhance the City's PlaceTypes established in the LUE by creating great places; improving the urban fabric, and public spaces; and defining edges, thoroughfares, and corridors. In addition, the City intends to utilize the UDE to foster healthy, sustainable neighborhoods; promote compact and connected development; minimize and fill in gaps in the urban fabric of existing neighborhoods; improve the cohesion between buildings, roadways, public spaces, and people; and improve the economic vitality of the City.

As illustrated in Chapter 3.0, Project Description, and Table 3.B, Anticipated Project Build-Out Summary, compared to existing conditions, the proposed LUE would accommodate a population increase of 18,230 persons, an employment increase of 28,511, and a net increase of 28,524 units by the year 2040. More specifically, as illustrated by Tables 3.B through 3.D in Chapter 3.0, the proposed project would allow for an increase in 28,524 dwelling units (1,274 and 27,250 single-

family and multi-family, respectively) and would accommodate an increase of 13,542,617 square feet (sf) of non-residential uses to accommodate employment growth. The project would also accommodate an increase in population and employment by 18,230 people and 28,511 jobs, respectively. With the exception of housing, these projected increases in housing units, population, and employment are consistent with 2016–2040 growth projections developed by the Southern California Association of Governments (SCAG) for the region. The project-related increase in housing units is greater than SCAG projections, but is consistent with the number of housing units that were determined to be required in the City not only as part of the RHNA process, but also as identified in the AFH to address existing overcrowding.

5.4.2 Project Objectives

Each alternative is analyzed to determine whether it achieves the basic objectives of the proposed project. As stated in Chapter 3.0, Project Description, the City has established the following intended specific objectives for the General Plan updated LUE and new UDE that would serve to aid decision-makers in their review of the proposed project and its associated environmental impacts:

1. Promote livability, including environmental quality, community health and safety, the quality of the built environment, and economic vitality.
2. Meet the City's housing needs as identified in the and Regional Housing Needs Assessment Requirement (7,048 new dwelling units by the year 2021) and the Assessment of Fair Housing (21,476 housing units to address existing housing needs) by diversifying housing opportunities through the provision of a variety of housing types and the provision of market-rate and affordable housing units.
3. Accommodate strategic growth in the Downtown area, around regional-serving facilities, along major corridors, and in transit-oriented development areas; create and preserve open space; accommodate economic development by converting industrial areas to neo-industrial uses in appropriate locations, promote regional-serving uses, convert industrial uses to commercial uses in locations more suitable for commercial character, and revitalize the Waterfront areas.
4. Implement sustainable planning and development practices by creating compact new developments and walkable neighborhoods to minimize the City's contribution to greenhouse gas emissions (GHGs) and energy usage.
5. Create job growth allowing for new businesses while also maintaining and preserving existing employment opportunities at the City's regional facilities and employment centers. Promote increased employment opportunities for Long Beach residents at differing levels of educational and skill attainment.
6. Promote changes in land use and development that reflect changes in the regional economy. Promote land uses that transform now-vacant or under-utilized former employment centers into new sources of employment.

7. Provide high-quality housing in a variety of forms, sizes, and densities to serve the diverse population of the City.
8. Preserve low-density neighborhoods while improving pedestrian, bicycle, and transit access in these areas.
9. Ensure fair and equitable land use by making planning decisions that would ensure the fair and equitable distribution of services, amenities, and investments throughout the City.
10. Provide reliable public facilities and infrastructure by expanding and maintaining the current infrastructure to serve new and existing developments in the City.
11. Increase access to green and open space through the creation of urban open spaces and greenscapes and providing for clean beaches, waterways, preserves, and parklands.
12. Restore and reconnect with local natural reserves through the utilization of clean energy, best management practices (BMPs), and current technologies.
13. Create “Great Places” places by improving the connectivity, the visual appearance of and development of public spaces; promote sustainable design practices; encourage design techniques that foster economic development; preserve historic districts and the unique character of each neighborhood; provide for public art; and expand the unified sign program to increase wayfinding within neighborhoods and PlaceTypes.
14. Improve the urban fabric by creating complete neighborhoods and community blocks, properly place and design new development to prevent visual and land use conflicts; promote compact urban and infill development, clearly define boundaries between natural and urbanized areas, preserve iconic buildings; and provide pedestrian furniture and wide sidewalks to create walkable blocks.
15. Preserve the City’s natural features, open space, and parks throughout the City, while also providing new public spaces throughout the community, parks, and plazas at infill sites, and parklets along sidewalks, particularly in areas with the least access to greenspace.
16. Encourage building form and design to improve the interface between buildings and streets; develop areas along public sidewalks that promote streets as “public rooms;” design parking lots and access points to be pedestrian-friendly; provide buffers along streetscapes to buffer parking areas and promote walkability; provide bicycle infrastructure; establish safe transit infrastructure; and design streetscapes utilizing sustainable streetscape strategies.
17. Promote high-quality design of the built environment. Enhance visual interest, improve functionality and inspire pride through thoughtful design, high-quality materials and a diversity of architectural styles throughout neighborhoods and the entire City.

5.4.3 Significant Unavoidable Impacts of the Proposed Project

As described further in Chapter 2.0, Introduction, the proposed project would result in either no impacts or less than significant impacts related to the following topics: agricultural resources, biological resources, cultural and tribal cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, mineral resources, recreation, and wildfires.

As described in Chapter 4.0, Existing Environmental Setting, Environmental Analysis, Impacts, and Mitigation Measures, the proposed project would result in less than significant impacts related to aesthetics, land use, population and housing, public services, utilities, and energy. The proposed project would result in significant unavoidable impacts related to air quality, GHG emissions, noise, and transportation.

For the purpose of this analysis, it is assumed that all of the alternatives would comply with applicable federal, State, and local regulations, policies, and ordinances. It is also assumed that all mitigation measures required for project implementation would apply to the project alternatives and similar reductions in impacts would be achieved through such mitigation. Therefore, the following discussion focuses on the ability of the alternatives to reduce project impacts and the potential impacts of the project alternatives related to these issues.

5.5 ALTERNATIVE 1: NO PROJECT ALTERNATIVE

5.5.1 Description

Consistent with Section 15126.6 of the *State CEQA Guidelines*, the No Project Alternative assumes implementation of the existing General Plan LUE (1989) and SRE (1975) instead of the proposed General Plan update. Under the No Project Alternative, existing land uses would remain in place and future development in the City would occur as anticipated in a reasonable manner as currently allowed under the General Plan LUE (1989). Socioeconomic projections that were identified for the City in the 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) would continue to occur within the planning area through the year 2040 under the No Project Alternative. The distribution and location of projected growth would occur in a manner that is consistent with the City's existing General Plan and zoning documents, which segregates residential, commercial and industrial land uses and accommodates for limited growth in most areas. Continuation of this approach could exacerbate existing housing issues in the City related to affordability and overcrowding that developed over the implementation period of the existing LUE.

As previously stated, the existing 1989 LUE contains a General Plan Land Use Map and a discussion of the intended and allowable uses within each land use type. The existing LUE determines land use on a parcel-by-parcel basis. In addition to a description and map of land use categories, the existing 1989 LUE establishes goals and objectives aimed at guiding the pattern of development in the City focused on segregating land uses and controlling the rate of development.

The existing General Plan does not currently include a UDE. However, the existing SRE designates roadways within the City for which view protection should be considered and establishes varying design standards to ensure the continued maintenance of the aesthetic character of these roadways.

The No Project Alternative would allow for the existing LUE and SRE to continue to function as they currently do into the foreseeable future. Development under the existing General Plan would be the same as compared to the proposed General Plan Update, but would include 15,121 fewer housing units than the proposed project.¹ Under the No Project Alternative, growth would occur in a manner that is consistent with the approved LUE. Based on the approved LUE and associated specific plans, the majority of development is anticipated to occur along the Long Beach Boulevard Corridor (Midtown Specific Plan), and in the Downtown (Downtown Community Plan) and the South East Area Specific Plan (SEASP) areas. As such, the No Project Alternative assumes that the existing General Plan and zoning would remain unchanged and that future growth would not be concentrated in these area but would occur throughout the City.

5.5.2 Environmental Analysis

5.5.2.1 Aesthetics

Future development allowed under the existing LUE (1989) and SRE would be evaluated for consistency with development standards related to scenic vistas currently adopted under the existing LUE, SRE, Municipal Code, and/or Specific Plans. Therefore, continuation of the existing LUE and SRE under the No Project Alternative would not result in the obstruction or degradation of existing scenic vistas, and impacts would be less than significant.

The No Project Alternative could result in changes to the visual character of the City and its distinct neighborhoods due to future development within the Planning Area. However, goals, policies, and objectives outlined in the existing LUE and SRE would prevent the substantial degradation of visual character, resulting in a less than significant impact.

Artificial lighting would be included as part of future developments under the existing LUE and SRE. Exterior lighting would likely be located along streets, within parking lots, on buildings, on signs, and along walkways. Interior lighting would include building lighting that could be visible from outside. While new and substantially renovated projects could cause the addition of lighting sources within the planning areas, these would be consistent with existing lighting levels due to the existing urban nature of the City. Moreover, due to the built-out nature of the City, existing sources of glare are already present throughout the City. The sources of glare are not anticipated to change under the No Project Alternative. As such, impacts related to light and glare would be less than significant.

Because the No Project Alternative would develop fewer housing units than the proposed project, it would result in fewer changes to the viewsheds throughout the City. However, the proposed project would result in the replacement of older housing with newer construction, thereby improving the visual quality within some neighborhoods, unlike this alternative. Overall, impacts to aesthetics would continue to be less than significant for the No Project Alternative and the proposed project.

¹ The No Project Alternative allows for the continuation of the existing LUE, which includes adopted specific plans. Of the 28,524 new housing units that are included as part of the proposed project and are needed to address affordability and overcrowding, a total of 13,403 new housing units are already accommodated in recently approved specific plans (e.g., the Downtown Plan, Midtown Specific Plan, and Southeast Area Specific Plan).

5.5.2.2 Air Quality

The No Project Alternative is based on the continued implementation of the existing General Plan LUE (1989) and SRE (1975). The No Project Alternative would result in the same amount of population and employment growth as the proposed project, consistent with growth projections, outlined measures, and mitigation due to the speculative nature of the land use plan (i.e., the timing and amount of growth are unknown at this time) and the lack of project-specific details upon which to base air emissions. The No Project Alternative would allow for a series of individual projects to be implemented consistent with the existing LUE (1989). Similar to the proposed project, it is not possible to accurately analyze the future project-specific impacts because construction details vary by project based on parcel size, construction schedule, building size, and the amount of paving and utility construction, etc. Therefore, similar to the proposed project, the No Project Alternative would result in significant unavoidable construction impacts related to the violation of air quality standards due to the unknown and speculative nature of future development.

While both the No Project Alternative and the proposed project would result in significant air quality impacts, the proposed project would result in the potential development of more housing units (resulting in additional construction impacts and vehicular trips) than the No Project Alternative. Therefore, the No Project Alternative would likely result in fewer air quality impacts than those associated with the proposed project. However, it should be noted that the No Project Alternative would not result in the establishment of the Neo-Industrial PlaceType, which is aimed at minimizing air quality impacts by establishing a light-industrial buffer zone between existing high-emitting industrial uses and residential uses in the City as well as other policies and programs such as the Green Zones implementation measure.

As discussed further in Section 4.3, Air Quality, horizon year 2040 emissions would decrease due to the overall decrease in VMT and reduction in vehicle emission rates that would occur with or without the proposed project. However, the No Project scenario would continue to result in significant and unavoidable operational impacts associated with the violation of air quality standards despite the implementation of mitigation because emissions levels would remain above SCAQMD regional significance thresholds. Moreover, because the South Coast Air Basin is in nonattainment for particulate matter less than 2.5 microns in size and particulate matter less than 10 microns in size (PM_{2.5} and PM₁₀, respectively) and O₃, the No Project scenario would make a cumulatively considerable contribution to criteria pollutant emissions.

There would be construction of fewer residential units under the No Project Alternative, and therefore, construction emissions would be reduced as compared to the proposed project. On average, the maximum construction emissions associated with the proposed project are not anticipated to exceed the SCAQMD's thresholds for VOC, NO_x, CO, SO_x, PM_{2.5}, or PM₁₀ emissions. However, because the combination, number, and size of projects that could be under construction at any one time are unknown, in an abundance of caution, this impact is considered to be significant and unavoidable for the proposed project. Therefore, although the No Project Alternative could result in lower construction and operational air quality emissions than the proposed project, it would, similar to the proposed project, have significant and adverse impacts related to criteria pollutants given the unknown quantity and timing of construction.

The proposed project would not result in significant unavoidable impacts related to the exposure of sensitive receptors to substantial localized CO concentrations. Under existing and future vehicle emission rates, a project would have to increase traffic volumes at a single intersection by more than 44,000 vehicles per hour—or 24,000 vehicles per hour where vertical and/or horizontal air does not mix—in order to generate a significant CO impact. Continuation of future development consistent with the 1989 LUE would result in some intersections operating better and some intersections operating worse than the proposed project. As such, similar to the proposed project, it is anticipated that the No Project Alternative would not produce the volume of traffic required to generate a CO hot spot. Therefore, similar to the proposed project, implementation of the No Project Alternative would not be expected to result in CO hot spots. Impacts would be less than significant under the No Project Alternative.

Similar to the proposed project, development under the existing LUE would not create objectionable odors. Applicants for future projects would continue to be required to adhere to standard construction requirements aimed at minimizing odors from construction. Future developments would also be required to adhere to the City's solid waste regulations to ensure that project-generated refuse would be stored in covered containers and trash removed at regular intervals. Similar to the proposed project, the No Project Alternative would result in less than significant odor impacts.

Overall, air quality impacts anticipated under the No Project Alternative would be similar to those identified for the proposed project and many would remain significant and unavoidable. However, because the proposed project would allow for additional growth in housing and would result in an increase in VMT, impacts associated with the No Project Alternative would be incrementally fewer than under the proposed project.

5.5.2.3 Greenhouse Gas Emissions

The anticipated General Plan build out proposed as part of the project was determined to result in less than significant impacts related to conflicts with plans adopted for the purpose of reducing GHG emissions following implementation of mitigation requiring adoption of a GHG Reduction Plan or Climate Action and Adaptation Plan (CAAP). However, operational GHG impacts on the environment as a result of anticipated build out of the proposed project were considered to be significant and unavoidable despite the implementation of mitigation.

As previously stated, the No Project Alternative would allow for the continuation of development in the City in a manner that is consistent with the existing 1989 LUE. Future growth envisioned under the No Project Alternative would result in a reduction in GHG emissions as compared to the proposed project. As described further in Section 4.3, Greenhouse Gas Emissions, the No Project Scenario would result in 1,628,900 MT CO₂e/year (2.4 MT CO₂e/year per service population) whereas the proposed project would result in 1,670,419 MT CO₂e/year (2.5 MT CO₂e/year per service population). The reduction in GHGs under the No Project scenario is largely attributed to the decrease in citywide VMT associated with this scenario as compared to existing 2018 conditions. It should be noted that the decrease in VMT associated with the No Project scenario is largely attributed to shared discretionary rides between multiple families living in the same unit due to

overcrowding conditions in the City. Therefore, implementation of the No Project Alternative would result in fewer GHG emissions than the proposed project.

5.5.2.4 Land Use and Planning

The No Project Alternative would allow for continued development within the planning area, consistent with the existing 1989 LUE. The types, intensities, location, and urban design of land uses would remain as approved under the existing LUE and SRE and would not result in impacts related to land use nor would it conflict with existing land use policies, as the existing General Plan is the guiding land use document for development within the City. Further, implementation of the existing LUE and SRE Plan would not physically divide an existing community. Therefore, the No Project Alternative would not interfere with any existing land use plans for the planning area. Because the No Project Alternative would not require amendments to the General Plan, Local Coastal Plan, or Zoning Code, land use and planning impacts would be slightly reduced as compared to the proposed project. While conflicts with local policies and plans regarding land use would be reduced under this alternative, it should be noted that the No Project Alternative would result in conflicts with state recommendations provided by the State Office of the Attorney General. Specifically, the No Project Alternative would conflict with the State's recommendation that General Plans be updated "periodically" (typically every 10 to 20 years) in order to address changes to State law; reflect current community values; update technical information (e.g., Census data); and respond to changing conditions in the environment, economy, and community. The No Project Alternative would also be inconsistent with the 2016–2040 RTP/SCS adopted by SCAG because the plan itself would not have a correct horizon year (2040) or target population, and would not allow for transit-oriented development along all high-quality transit corridors. The No Project Alternative would not meet the overall goals established in the RTP/SCS to the same degree as the proposed project.

5.5.2.5 Noise

The No Project Alternative would allow for development consistent with the existing LUE and SRE. The types, intensities, and location of land uses would remain as currently approved under the existing General Plan Elements. Sources of noise within the planning area would remain substantially similar to existing conditions or incrementally increase as growth occurs, with the primary source remaining vehicle roadway noise.

Construction noise impacts associated with the proposed project were identified as significant and unavoidable even after mitigation since the location, the proximity to sensitive receptors, and the types of construction equipment associated with new construction projects are all unknown at this time. The No Project Alternative would result in fewer residential units than the proposed project and therefore, would result in reduced noise impacts associated with construction and operation of residential uses as compared to the project. However, construction noise impacts would, similar to the proposed project, still be considered significant and unavoidable as the location and types of construction equipment are unknown at this time. In addition, development under the existing LUE could result in the exposure of sensitive receptors to elevated noise levels and strong vibration due to construction activities, because the No Project Alternative does not include a policy requiring an acoustical analysis for discretionary noise sensitive projects located in an area with noise levels greater than 60 dBA CNEL and/or within 500 feet of a freeway (proposed LUE Policy LU 16-8).

Consequently, the No Project Alternative would result in reduced noise levels and sources as compared to the proposed project, but could have greater noise and vibration impacts for sensitive receptors in areas with noise levels greater than 60 dBA CNEL and/or within 500 feet of a freeway as compared to the proposed project.

5.5.2.6 Population and Housing

The current 2016–2040 RTP/SCS SCAG growth projections are based on the General Plans and Housing Elements of communities across Southern California, including Los Angeles County and the City. The City has worked closely with SCAG to develop growth projections for the 2016–2040 RTP/SCS that are aligned with future growth envisioned under the proposed project. Therefore, the 2016–2040 RTP/SCS accounts for the population and employment estimates accommodated by the proposed project. However, the proposed LUE also incorporates housing projections provided by the Department of Housing and Community Development. Specifically, as an outcome of the most recent RHNA process, the City is required to plan for 7,048 new dwelling units by the year 2021, and an undetermined number in future years. Further, due to insufficient construction of new housing units within Long Beach and the region in the past, 21,476 housing units were determined to be required to address existing housing needs that have led to overcrowding due to lack of sufficient units. In total, 28,524 housing units are required to address future (7,048) and existing (21,476) housing needs. Of the 28,524 new units, 13,403 new housing units are already accommodated in recently approved specific plans (e.g., Downtown Plan, Midtown Specific Plan, and Southeast Area Specific Plan).¹ Therefore, the proposed project would facilitate the development of 15,121 new housing units outside of these specific plan areas.

The No Project Alternative would allow for existing development patterns to occur in a manner that is consistent with the existing LUE and SRE. Under these existing plans, the City may not be able to accommodate housing at a density that would allow for the number of housing units that are required to alleviate existing overcrowding issues and provide affordable housing opportunities. Rather, the No Project Alternative would continue to exacerbate overcrowding in the planning area and would worsen conditions related to affordability, as the demand for housing would continue to increase as population growth occurs as projected by SCAG’s 2016–2040 RTP.

Similarly, the No Project Alternative would not allow for the same level of employment opportunities required to accommodate projected employment growth because development would occur at a lower intensity and scale in accordance with the existing LUE. As such, the No Project Alternative would result in a lower jobs-to-housing ratio than the proposed project. The No Project Alternative would also be inconsistent with the City’s objective to comply with State-mandated affordable housing options as required by the RHNA process and the AFH conducted by the U.S. Department of Housing and Urban Development (HUD). Moreover, failure to comply with the RHNA mandate is enforceable through the Housing Accountability Act and could result in a loss of funding to the City, consistent with State law and recent actions by the State aimed at holding

¹ In total, 39.3 percent of the anticipated future housing growth would occur within these Specific Plan areas (i.e., 17.5 percent in the Downtown area, 12.7 percent in the Transit-Oriented Development areas of the Midtown Specific Plan, and 9.1 percent in the Southeast Area Specific Plan).

cities accountable to meeting their RHNA requirements. For these reasons, impacts related to population and housing would be significantly worse under the No Project Alternative as compared to the proposed project.

5.5.2.7 Public Services

Under the No Project Alternative, development would occur throughout the planning area as permitted by the existing 1989 LUE. Of the 28,524 housing units that are needed to address issues related to affordability and overcrowding, the No Project Alternative would only account for 13,403 housing units that are already accounted for in approved specific plans. Therefore, the No Project Alternative would result in fewer impacts related to police and fire facilities as compared to the proposed project. However, continuing development under the existing LUE could still result in a significant impact to police and fire services due to the scale and nature of future growth in the City as projected under the 2016–2040 RTP/SCS. Therefore, similar to the proposed project, the No Project Alternative could potentially result in the need for additional police and fire staffing and equipment. Similar to the proposed project, future projects would be reviewed by the City on a project-by-project basis and would need to comply with any requirements in effect when the review is conducted. Prior to the issuance of building permits, future project applicants would be required to pay the adopted fire and/or police facilities impact fees. Additional police and fire personnel and resources would be provided through the annual budget review process. However, similar to existing conditions of overcrowding, it is likely that population growth would still occur even without construction of adequate housing. Increased population without construction of new housing units would strain public services as development impact fees would not be collected. Although this overcrowded condition could result in greater impacts on police and fire services as compared to the proposed project, the No Project Alternative is still considered in a less than significant impact. Impacts to police and fire services would continue to be less than significant under both the proposed project and No Project Alternative.

Under the No Project Alternative, impacts to libraries and schools would be similar to the proposed project because population and employment growth would be similar to the proposed project. As with the proposed project, future development projects would be required to pay school developer fees to Long Beach Unified School District (LBUSD) for the operation, maintenance, and development of schools to accommodate future student enrollment. Additional school resources would also continue to be funded by an increase in tax revenue because of future growth. However, similar to existing conditions of overcrowding, it is likely that population growth would still occur even without construction of adequate housing. Increased population without construction of new housing units would strain school resources, as development impact fees would not be collected. This overcrowded condition could result in greater impacts on schools as compared to the proposed project although overall impacts would still be considered less than significant. Impacts to libraries would be less than significant because the increased demand for library facilities would be met by an increase in electronic resources that would be accommodated by existing libraries located throughout the planning area. Impacts to library facilities would continue to be less than significant under both the proposed project and the No Project Alternative.

For the reasons stated above, impacts to public services would be similar to, although slightly greater than, under the No Project Alternative as compared to the proposed project.

5.5.2.8 Traffic and Transportation

Under the No Project Alternative, development would occur consistent with the 1989 LUE and SRE. As described further in Section 4.8, Transportation, traffic under the existing LUE would result in some intersections operating better and some intersections operating poorer than the proposed project due to the redistribution of land uses. Even with the implementation of physical improvements aimed at improving traffic flow at congested intersections, both the proposed project and the No Project Alternative would result in significant unavoidable transportation impacts as some improvements may not be feasible (e.g., located outside of the City's jurisdiction, or insufficient rights-of-way for improvements, etc.).

Although transportation impacts to intersections and roadways within the City would be significant and similar under the No Project Alternative and the proposed project, VMT per capita would slightly increase under the proposed project as compared with No Project Alternative (18.0 VMT per capita under the proposed project scenario as compared to 18.2 VMT per capita under the No Project scenario). This increase in VMT is attributed to the increase in housing units attributed to the proposed project. In other words, because the proposed project reduces overcrowding compared to the existing LUE, the number of discretionary trips increases, as does the total VMT. Although VMT per capita is anticipated to increase under the proposed project, the total VMT per household is anticipated to decrease due to the distribution of land uses under the proposed project. Specifically, the No Project scenario would result in 49.9 VMT per household whereas the proposed project would result in 46.1 VMT per household.

Overall, impacts related to transportation would be similar to, although slightly less than, those identified for the proposed project.

5.5.2.9 Utilities

Under the No Project Alternative, development would occur throughout the planning area as allowed by the existing LUE and SRE. Population and employment growth projections for the City that are outlined in the 2016–2040 RTP/SCS and are accommodated in the proposed LUE are also accounted for within the existing Urban Water Management Plan (UWMP) approved by the City. However, anticipated build out of the proposed project would allow for an increase in residential dwelling units (28,524 units) beyond what is outlined in the 2016–2040 RTP/SCS and is accounted for in the existing UWMP in order to provide sufficient housing units to address overcrowding.

Under the proposed project, the project-related increase in water demand in 2040 would be 59,105 acre-feet, or less than one percent of the Long Beach Water Department's (LBWD) total projected water supply for the year 2040. Similar to the proposed project, the No Project Alternative would be required to comply with Title 24 provisions regarding the use of water-efficient features and policies and programs outlined in the 2015 Water Quality Management Plan (WQMP). However, the No Project Alternative would not require future developments to comply with the water reduction measures outlined in the proposed LUE. The No Project Alternative would result in fewer housing

units than the proposed project, which could result in a reduced demand for water supplies. However, it is important to note that a decreased demand for water in the City under the No Project Alternative may not occur, as the majority of new units accommodated by the proposed project are needed to alleviate overcrowding of existing residents that are already using water. Therefore, the No Project Alternative would result in a demand for water that would be similar to, or slightly reduced than the demand for water under the proposed project. Impacts would continue to be less than significant under both scenarios.

The estimated wastewater flow associated with build out of the proposed project would be approximately 43 million gallons per day (mgd), which would represent approximately 4 percent of the remaining capacity of existing County Sanitation Districts of Los Angeles County (LACSD) facilities. The No Project Alternative would likely result in a decrease in wastewater flow due to the reduction in the number of housing units envisioned under this alternative. However, wastewater flows may be similar to the proposed project, as the majority of new housing units to be developed as part of the project are required to alleviate overcrowding of existing housing units with current Long Beach residents who are already generating wastewater. Therefore, the No Project Alternative would result in a demand for wastewater treatment facilities that would be similar to, or slightly reduced as compared to the demand under the proposed project. Impacts would continue to be less than significant under both scenarios.

As compared to the proposed project, the No Project Alternative has a reduced development potential due to the decrease in housing units proposed under this alternative. However, similar to the proposed project, future individual projects occurring under the No Project Alternative could increase impervious surface area, which could reduce infiltration and increase runoff. Under both alternatives, future projects would be reviewed on a project-by-project basis and would need to comply with any construction or post-construction requirements in effect when the review is conducted, including payment of Development Fees to fund future improvements to the City's stormwater infrastructure. Therefore, the No Project Alternative would result in impacts related to stormwater runoff and storm drain facilities that would be similar to, or slightly reduced, as compared to impacts identified for the proposed project. Impacts would continue to be less than significant under both scenarios.

As previously stated, the No Project Alternative would accommodate population and employment growth projected for the City by SCAG in the 2016–2040 RTP/SCS, but would result in 15,121 fewer housing units than proposed under the General Plan Update. Impacts related to the demand for new or renovated telecommunications facilities are determined based on population demand. As such, the demand for telecommunications facilities under the No Project Alternative would be the same as under the proposed project, as both alternatives assume the same amount of population growth. Impacts would continue to be less than significant under both scenarios.

Solid waste generation rates are higher for residential uses as compared to commercial and industrial uses. Given the reduction in housing units proposed under the No Project Alternative compared to the proposed project, the No Project Alternative is anticipated to result in a reduction in solid waste generation as compared to the proposed project. Because existing waste processing and disposal facilities could accommodate the increase in solid waste generated by the proposed

project, the reduced demand for solid waste facilities under the No Project Alternative would also be accommodated by existing facilities, resulting in similar impacts. Impacts would continue to be less than significant under both scenarios.

5.5.2.10 Energy

Under the proposed project, the projected electricity demand in the City would be 1,950,216,130 kilowatt hours (kWh) in 2040 (approximately 17.18 percent greater than the existing electricity demand). The electricity demand associated with the No Project Alternative would likely be reduced as compared to the proposed project due to the decrease in development potential and the associated reduction in housing units. As with the proposed project, new facilities required to support the project-related demand for electricity would be constructed in accordance with the demand for the new service. Therefore, the No Project Alternative would result in impacts related to electricity that would be similar to, or slightly reduced, than impacts identified for the proposed project. Impacts would continue to be less than significant under both scenarios.

Future development occurring under the proposed project would generate a natural gas demand of 4,649,160,730 in 1,000 British thermal units (kBtu), or an approximately 16.34 percent increase in natural gas demand. The natural gas demand associated with the No Project Alternative would likely be reduced as compared to the proposed project due to the decrease in development potential and the associated reduction in housing units. As with the proposed project, natural gas service will be added to the existing system operated and maintained by the Long Beach Energy Resources Department, as necessary, to meet the requirements of individual projects within the City under the No Project Alternative. Impacts would continue to be less than significant under both scenarios.

The No Project Alternative would allow for the continuation of development in the City in a manner that is consistent with the existing 1989 LUE. Future growth envisioned under the No Project Alternative would result in a reduction in VMT as compared to the proposed project (18 VMT per capita compared to 18.2 VMT per capita). This reduction in VMT is largely attributed to the decrease in housing growth allowed under the No Project Alternative. Although the No Project Alternative would result in a slight reduction in VMT per capita, the proposed project would result in an overall reduction in VMT per household as compared to the No Project Alternative (49.9 VMT per household compared to 46.1 VMT per household). Therefore, the No Project Alternative would likely result in an increase in gasoline demand per household as compared to the proposed project, but would result in a lower demand on a per capita basis. Under both alternatives, vehicle fuel efficiency is expected to increase as new fuel economy standards are established. Therefore, the No Project Alternative would result in impacts related to gasoline demand that are similar to the proposed project. Impacts related to the wasteful, inefficient, or unnecessary consumption of energy resources would continue to be less than significant under both scenarios.

5.5.3 Overview of Potential Impact/Comparison to Proposed Project

Under the No Project Alternative, development would continue as allowed under the 1989 General Plan LUE and 1975 SRE and is anticipated to result in 15,121 fewer housing units as compared to the proposed project. The No Project Alternative would not require a General Plan Update/Amendment, Local Coastal Plan Amendment, or Rezone Amendment. No change to the adopted land use

designations would occur. Overall, impacts for the No Project Alternative would be similar to the proposed project. However, similar to the proposed project, under the No Project scenario, significant unavoidable air quality, GHG, noise, and traffic impacts would continue to occur.

5.5.4 Project Objectives

The No Project Alternative would not achieve any of the 17 Project Objectives. The No Project Alternative would not help the City achieve its goal of creating great places through the establishment of new PlaceTypes and urban design principles not currently provided in the City's General Plan. Although the No Project Alternative would accommodate the same amount of population and employment growth as the proposed project, this alternative would be inconsistent with the project and the City's objective to comply with State-mandated affordable housing options as required by the RHNA process and the AFH conducted by the United States Department of Housing and Urban Development. Moreover, failure to comply with the RHNA mandate is enforceable through the Housing Accountability Act and could result in a loss of funding to the City and legal action by the State, as evidenced by the State's recent actions elsewhere in Southern California. Therefore, the No Project Alternative would exacerbate existing issues related to overcrowding, would likely decrease affordability, and could result in punitive actions by the State because of the City's failure to meet its affordable housing requirements.

5.6 ALTERNATIVE 2: REDUCED PROJECT ALTERNATIVE

5.6.1 Description

This Reduced Project Alternative assumes the planning area would be subject to the LUE and UDE goals, strategies, and policies similar to those included under the proposed project, but with adjustments to the proposed PlaceType intensities. This alternative would decrease overall intensities by 25 percent on a citywide basis as compared to the proposed project. In total, Alternative 2 would facilitate 21,393 dwelling units (7,131 fewer residential units than the proposed project) and 10,156,963 square feet of non-residential uses (3,385,654 fewer non-residential square feet than the proposed project). Alternative 2 would require a General Plan Update/Amendment, a future Local Coastal Plan Amendment, and a Rezone Amendment, similar to the proposed project.

5.6.2 Environmental Analysis

5.6.2.1 Aesthetics

Similar to the proposed project, Alternative 2 would have less than significant impacts related to scenic vistas, scenic resources, light, glare, and the existing visual character of the planning area and its surroundings. As stated previously, Alternative 2 would reduce building intensity by 25 percent throughout the City as compared to the proposed project. Unlike the proposed project, buildings proposed as part of Alternative 2 would be constructed at reduced heights associated with the reduction in allowable building intensity and density under this alternative. The reduction in building heights under this alternative would reduce impacts related to view obstructions in areas considered as scenic vistas and would also reduce changes related to visual character as compared to the proposed project. However, like the proposed project, this alternative would be required to comply with applicable policies regulating urban design and building form in the proposed UDE that

would serve to minimize impacts related to aesthetics under this alternative. In addition, new development proposed under Alternative 2 would also be required to comply with the City's Municipal Code, which includes lighting and landscaping standards. Overall, the reduction in building intensity and density proposed under this alternative would result in fewer impacts related to aesthetics than the proposed project. Therefore, the overall visual impacts of Alternative 2 would be reduced as compared to the project, but impacts to visual resources would continue to be less than significant under both scenarios.

5.6.2.2 Air Quality

Alternative 2 would, unlike the proposed project, be consistent with the 2016 AQMP because the population and employment is not anticipated to increase over the 2016–2040 growth projections developed by SCAG for the region and the housing units allowed would be consistent with the assumptions in the 2016 AQMP emission inventory. Therefore, Alternative 2 would, unlike the proposed project, have less than significant impacts related to conflicts with adopted air quality management plans.

Potential construction and operational emissions associated with Alternative 2 would be less than the proposed project because this alternative reduces the potential square footage of building through a 25 percent reduction in land use intensities and development potential throughout the City. However, similar to the proposed project, Alternative 2 could exceed significance thresholds for criteria pollutants during construction and operation and such impacts would remain significant and unavoidable. Overall, impacts would be incrementally reduced during construction and operation when compared to the proposed project due to the reduced amount of building square footage accommodated by this alternative.

Similar to the proposed project, Alternative 2 would result in less than significant impacts related to the exposure of sensitive receptors to substantial localized CO concentrations. Alternative 2 would result in a reduction in traffic volumes throughout the City due to the reduction in building potential. Therefore, implementation of Alternative 2 could result in some intersections operating better than the proposed project. However, similar to the proposed project, Alternative 2 would not produce the volume of traffic required to generate a CO hot spot (e.g., more than 44,000 vehicles per hour—or 24,000 vehicles per hour where vertical and/or horizontal air does not mix). Therefore, similar to the proposed project, implementation of Alternative 2 would not be expected to result in CO hot spots. Impacts would be less than significant under Alternative 2.

Similar to the proposed project, Alternative 2 could also result in the exposure of sensitive receptors to substantial pollutants. To address this, regulatory measures (e.g., SCAQMD Rule 201 for a permit to operate, Rule 403 for fugitive dust control, Rule 1113 for architectural coatings, Rule 1403 for new source review, and the CARB's Airborne Toxic Control Measures) are currently in place, and mitigation would be imposed at the project level to ensure that potential construction and operational impacts would be less than significant. Although Alternative 2 would expose fewer sensitive receptors to substantial pollutants because there would be less construction than under the proposed project, with implementation of these measures, impacts for Alternative 2 would be similar to the proposed project and remain less than significant.

Similar to the proposed project, Alternative 2 could expose sensitive receptors to toxic air contaminants. Preparation of project-specific technical health risk assessments evaluating operational-related health risk impacts would be required to ensure that operational-related emissions are reduced to the maximum extent feasible for projects that require environmental evaluation under CEQA. However, because the scale of operational activities has not been determined or estimated and in order to present conservative assumptions, the TAC health risk impacts associated with future operation of individual projects that may occur with Alternative 2 are assumed to be potentially significant, similar to the proposed project.

Impacts related to the exposure of a substantial number of people to odors would be similar and less than significant under both the proposed project and Alternative 2, as future projects occurring under both scenarios would be required to comply with SCAQMD rules and applicable provisions of the City's Municipal Code regulating nuisance odors.

Overall, there would be fewer air quality emissions for Alternative 2 as compared to the proposed project, but impacts would remain significant and adverse, similar to the proposed project.

5.6.2.3 Greenhouse Gas Emissions

Because Alternative 2 would accommodate the development of up to 21,393 dwelling units and 10,156,963 square feet of non-residential uses it would, similar to the proposed project, have significant impacts related to GHG emissions. GHG emissions would likely exceed the 2040 per capita efficiency target of 1.92 MT CO₂e/yr per service population as presented in the GHG Emission Reduction Target Options Memorandum that accompanies the City's draft CAAP.

Overall, GHG emissions would be incrementally less during construction when compared to the proposed project due to the reductions in land use intensities allowed under this alternative. GHG emissions would also be lower due to the reduced amount of building materials that would need to be produced and transported to the planning area to complete the construction.

Under this alternative and the proposed project, future development would be designed to meet and exceed all California Green Building Standards Code (CALGreen Code) building efficiency standards (Title 24, Part 11) and the California Energy Code Building Energy Efficiency Standards (Title 24, Part 6), which would reduce energy consumption. Although Alternative 2 would result in a reduction of development potential which could reduce operational emissions, this reduced project alternative would allow for fewer new, more efficient buildings, which could actually increase operational emissions. In addition, while vehicle trips are projected to decrease under this alternative, it is anticipated that peak-hour VMT would increase because of reduced land use efficiency associated with the reduced development in close proximity to transit rich areas under this alternative. However, overcrowding is anticipated to be worse under Alternative 2 than under the proposed project scenario, which according to the traffic model would reduce off-peak VMT because of shared discretionary trips (e.g., the model assumes that several families living in the same household in overcrowded conditions commute to the grocery store together). Therefore, GHG emissions associated with VMT would only be incrementally lower than GHG emissions associated with anticipated General Plan build out under with the proposed project (2040).

Overall, GHG emissions would be reduced for Alternative 2 compared to the proposed project, but would remain significant and adverse under both scenarios, as the per capita efficiency target would likely be exceeded.

5.6.2.4 Land Use

Similar to the proposed project, Alternative 2 would have less than significant impacts related to land use and planning. Under this alternative, as well as the proposed project, there would be no impacts related to the division of an existing community. Similar to the proposed project, Alternative 2 would require the approval of a General Plan Update/Amendment, future Local Coastal Plan Amendments, Zoning Amendments, and amendments to existing Specific Plans (e.g., Downtown Community Plan). Alternative 2 would also be consistent with the majority of policies contained in the City's General Plan, the California Coastal Act, the Regional Comprehensive Plan, and the 2016–2040 RTP/SCS. Therefore, impacts related to land use for Alternative 2 are considered similar to those associated with the proposed project. Impacts would remain less than significant under both scenarios.

5.6.2.5 Noise

Similar to the proposed project, Alternative 2 would result in significant and unavoidable impacts related to construction noise. Construction activity associated with Alternative 2 would be incrementally less due to the reduction in the potential amount of construction, but would generally result in similar noise and vibration levels since the construction and excavation areas, methods, and equipment would be similar. Short-term construction noise generated during excavation, grading, and building construction would be potentially significant under both the proposed project and Alternative 2. Although mitigation would reduce construction noise associated with future projects, since the location, proximity to sensitive receptors, and type of construction equipment associated with new construction projects are unknown at this time, this impact is considered significant and unavoidable for both Alternative 2 and the proposed project.

Alternative 2 may also result in a reduction in vehicular trips generated throughout the City compared to the proposed project due to the reduction in development potential under this alternative. Therefore, Alternative 2 may result in lower mobile-source noise levels as compared to the proposed project. However, similar to the proposed project, mobile source noise would remain less than significant.

Overall impacts related to noise for Alternative 2 are considered to be slightly less than those associated with the proposed project because there would be incrementally less development constructed under Alternative 2.

5.6.2.6 Population and Housing

Unlike the proposed project, Alternative 2 would have a significant impact on population and housing. Alternative 2 would reduce the square footage of potential development throughout the City as compared to the proposed project. This would result in less residential development, while population growth would continue to occur as projected in SCAG's 2016–2040 RTP/SCS. As such, Alternative 2 would likely continue to result in issues related to overcrowding throughout the City.

Non-residential development would also be reduced under Alternative 2 and the employment opportunities associated with those uses would be eliminated because development would occur at a lower intensity and scale than the proposed project. As such, Alternative 2 would result in a lower jobs-to-housing ratio than the proposed project.

In total, Alternative 2 would result in 7,131 fewer residential units in 2040 as compared to the proposed project. As such, Alternative 2 would provide for fewer housing units than needed to address existing housing needs related to affordability and overcrowding (28,524 units in total are needed to address current overcrowding and RHNA requirements, and an undetermined amount would be required to address future conditions). Alternative 2 would also be inconsistent with the City's objective to comply with State-mandated affordable housing options, as Alternative 2 would likely not facilitate the same number of residential units as the proposed project. Population growth is anticipated to occur whether or not additional housing is constructed, so this alternative would not meet the City's current or future housing needs.

Moreover, failure to comply with the RHNA mandate is enforceable through the Housing Accountability Act and could result in a loss of funding to the City, consistent with State law and recent actions by the State aimed at holding cities accountable to meeting their RHNA requirements. Therefore, impacts related to population and housing would be significantly worse under Alternative 2 as compared to the proposed project, resulting in a determination of significant and adverse for this alternative.

5.6.2.7 Public Services

Similar to the proposed project, Alternative 2 would have a less than significant impact on public services. Public services include fire protection, police protection, public schools, and public libraries. Because the amount of development would be reduced under Alternative 2, the demands for public services would also be incrementally reduced compared to the proposed project.

However, similar to existing conditions of overcrowding, it is likely that population growth would still occur even without construction of adequate housing. Increased population without construction of adequate new housing units would strain police, fire, school, and library resources, as development impact fees would not be collected. This overcrowded condition could result in greater impacts on police, fire, school, and library resources as compared to the proposed project. However, impacts would remain less than significant under both scenarios.

5.6.2.8 Transportation

Alternative 2 would generate fewer trips than the proposed project due to the reduction in development potential, which would incrementally decrease the number of intersections anticipated to operate in excess of the currently established level of service criteria. However, due to the scale of development allowed under Alternative 2 and existing congestion at intersections located within the study area, Alternative 2 would still result in significant unavoidable impacts to intersections within the study area, similar to the proposed project.

Alternative 2 may also result in a reduced off-peak hour VMT due to the anticipated increase in shared discretionary trips associated with overcrowded units under this alternative. However, peak-hour trips are anticipated to increase due to the reduced land use efficiency associated with the reduction in development potential and construction of fewer units in transit rich areas under this alternative. Therefore, Alternative 2 would not meet the State's goals of reducing VMT to the same extent as the proposed project.

Overall, impacts related to transportation under Alternative 2 would be similar to the proposed project, although impacts would remain significant and adverse under both scenarios.

5.6.2.9 Utilities

Similar to the proposed project, Alternative 2 would have a less than significant impact on utilities. Utilities include solid waste, public transportation, water, and wastewater. Because the amount of development would be reduced under Alternative 2, the demands for utilities would be reduced compared to the proposed project. Overall, impacts related to utilities under Alternative 2 are considered incrementally less than under the proposed project. Impacts would remain less than significant under both scenarios.

5.6.2.10 Energy

Similar to the proposed project, Alternative 2 would have a less than significant impact on energy resources. Energy demand associated with Alternative 2 would primarily include electricity, natural gas, and gasoline required to power vehicular trips and new development allowed under Alternative 2. Because the amount of development would be reduced under Alternative 2, the demands for energy would be reduced compared to the proposed project. Overall, impacts related to energy under Alternative 2 are considered incrementally less than under the proposed project. Impacts would remain less than significant under both scenarios.

5.6.3 Overview of Potential Impacts/Comparison to Proposed Project

Similar to the proposed project, Alternative 2 would result in significant unavoidable impacts related to air quality, GHG emissions, noise, and transportation. Although the decreased efficiency of development intensity near transit in Alternative 2 could lead to more significant impacts related to some air quality, GHG, and transportation sub-sectors, due to the reduction in development potential under Alternative 2, overall impacts would be less than with the proposed project.

Although overall environmental impacts would be reduced under Alternative 2, this alternative would not facilitate the same number of residential units (28,524) as anticipated under the proposed project that are required to alleviate existing issues related to affordability and overcrowding and could potentially exacerbate such conditions through 2040. As such, Alternative 2 would not allow the City to comply with State-mandated affordable housing requirements established during the RHNA process and the shortages identified in the AFH to the same extent as the proposed project. Moreover, failure to comply with the RHNA mandate is enforceable through the Housing Accountability Act and could result in a loss of funding to the City and legal action by the State, as evidenced by the State's recent actions elsewhere in Southern California. Therefore,

impacts to population and housing would be increased, and considered significant and adverse under this alternative.

5.6.4 Attainment of Project Objectives

Similar to the proposed project, Alternative 2 would implement 14 new PlaceTypes and design standards included in the LUE and UDE. However, this alternative would not achieve the Project Objectives to the same extent as the proposed project due to land use reductions throughout the City, particularly those focused near transit.

Alternative 2 would promote livability, environmental quality, community health and safety, the quality of the built environment, and economic vitality (Project Objective 1) through implementation of the LUE and UDE. While Alternative 2 would include many of the features of the proposed project, this alternative's consistency with the overall LUE goals of creating compact new development (Project Objective 4), job growth (Project Objective 5), and land use changes that coincide with the regional economy (Project Objective 6) would be achieved at a lesser extent due to the reduction in development potential under this alternative.

Alternative 2 would, however, include PlaceTypes that encourage sustainable development practices comprised of placemaking principles and design standards to create walkable and complete neighborhoods (Project Objectives 4, 12, 13, 14, 16, and 17). This alternative would achieve some of the Project Objectives related to the provision of diverse housing types (although less diverse housing type options may be provided under this alternative as fewer projects would be built), and would preserve existing neighborhoods (Project Objectives 7 and 8); however, Alternative 2 would not meet Project Objective 2 related to meeting housing needs identified during the RHNA process (7,048 new dwelling units by the year 2021) and the AFH (21,476 housing units to address existing housing needs).

The Open Space PlaceType under Alternative 2 would ensure access to natural and urban open spaces, as well their maintenance, restoration, and preservation (Project Objectives 11, 12, and 15). Similar to the proposed project, the 14 PlaceTypes would be distributed across the planning areas to ensure planning decisions are equitable and City investments are distributed in a manner that serves both new and existing developments in the City (Project Objectives 9 and 10). This alternative would meet many of the Project Objectives, but not as many or to the same degree as the proposed project.

5.7 IDENTIFICATION OF ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires the identification of an Environmentally Superior Alternative. *State CEQA Guidelines* Section 15126.6(e)(2) states that if the No Project Alternative is the Environmentally Superior Alternative, then the EIR shall also identify an Environmentally Superior Alternative among the other alternatives. Table 5.B provides, in summary format, a comparison of the level of impacts for each alternative to the proposed project.

The No Project/No Build Alternative has the least impact to the environment because it would not introduce PlaceTypes or urban design standards with the potential to increase land use intensities

and/or building heights in the City. While the No Project Alternative would lessen or avoid the impacts of the proposed project, the beneficial impacts of the proposed project—including implementing sustainable planning and development, creating job growth, accommodation of strategic growth near transit, and the provision of housing units required to meet State-mandated affordable housing targets and alleviate overcrowding—would not occur, and none of the Project Objectives would be met.

Table 5.B: Comparison of the Environmental Impacts of the Proposed Project to the Project Alternatives

Environmental Topic	Proposed Project Level of Impact After Mitigation	Alternative 1: No Project/No Development Alternative	Alternative 2: Reduced Project Alternative
Aesthetics	Less Than Significant	Similar	Similar
Air Quality	Significant and Unavoidable	Similar -	Similar
Greenhouse Gas Emissions	Significant and Unavoidable	Fewer	Similar +
Land Use	Less Than Significant	Fewer	Similar
Noise	Significant and Unavoidable	Greater	Similar -
Population and Housing	Less Than Significant	Greater	Greater
Public Services	Less Than Significant	Similar +	Similar +
Transportation	Significant and Unavoidable	Similar -	Similar
Utilities	Less Than Significant	Similar -	Similar -
Energy	Less Than Significant	Similar -	Similar -
Attainment of Project Objectives	Meets all of the Project Objectives	Meets none of the Project Objectives	Meets some of the Project Objectives but not all, and not to the same degree as the proposed project

Source: LSA (May 2019).

Legend:

Greater = Greater impacts than the proposed project

Fewer = Fewer impacts than the proposed project

Similar = Similar impacts as the proposed project

Similar - = Similar, although incrementally fewer impacts as compared to the proposed project

Similar + = Similar, although incrementally greater impacts as compared to the proposed project

VMT = vehicle miles traveled

With the exception of the No Project Alternative, the Environmentally Superior Alternative would be Alternative 2, Reduced Project Alternative. Overall, this alternative would lessen significant environmental impacts or result in impacts similar to those associated with the proposed project. Alternative 2 would achieve some of the Project Objectives; specifically, it would directly encourage development near existing and/or proposed transit (although to a lesser degree than the proposed project) with the direct intent to create compact development patterns and walkable neighborhoods, consistent with Project Objectives 3, 14, 16, and 17. However, this alternative would not increase livability, economic vitality, or health throughout the planning area to the same extent as the proposed project as it would reduce the allowable building potential by 25 percent, thereby reducing employment opportunities and opportunities for mixed-use developments that would promote livability. Moreover, because Alternative 2 would reduce development potential as

compared to the proposed project, this alternative's consistency with the overall LUE goals (Project Objective 3), job growth (Project Objective 5), and land use changes that coincide with the regional economy (Project Objective 6) would not be achieved to the same degree as the proposed project. In addition, the reduction in air quality, GHG, noise, and traffic impacts would be minimal in comparison to the economic value of providing housing and employment opportunities throughout the City. Air quality, GHG, noise, and transportation impacts would be reduced but would remain significant and unavoidable under Alternative 2.

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