



## **7.0 Alternatives to the Proposed Project**

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## 7.0 ALTERNATIVES TO THE PROPOSED PROJECT

In accordance with *CEQA Guidelines* Section 15126.6, *Consideration and Discussion of Alternatives to the Proposed Project*, this section describes a range of reasonable alternatives to the project, or to the location of the project. The analysis focuses on alternatives capable of avoiding or substantially lessening the project's significant environmental effects, even if the alternative would impede, to some degree, the attainment of the proposed project objectives, or would be more costly. The range of required alternatives is governed by the "rule of reason" that requires the analysis to set forth only those alternatives necessary to permit a reasoned choice. The alternatives are limited to ones that would avoid or substantially lessen any of the project's significant effects. Of those alternatives, only the ones that the lead agency has determined could feasibly attain most of the basic project objectives are examined in detail. The following are the project's goals and objectives, which were developed by the project Applicant team, in consultation with community feedback, and the City of Lake Forest.

- Develop in accordance with the Medium Density Residential land use designation (between 15-25 units per acre), as stated by the General Plan.
- Benefit the entire community by developing a minimum of 500 units to ensure that fees paid as required by the Development Agreement are adequate to fund public facilities.
- Benefit the entire community by providing adequate public open space (public parks and trail connections to existing regional trails) as well as the dedication of a site for a future civic center.
- Provide a diversity of housing types, to ensure that housing is available to residents with a range of incomes.
- Locate access points to facilitate access to both the Civic Center and future residential neighborhoods, while minimizing traffic impacts on existing residential neighborhoods.
- Ensure adequate internal circulation through street designs consistent with City standards.
- Allow the existing Irvine Ranch Water District water treatment facility operations to be retained and ensure that adequate separation between the facility and residential neighborhoods is maintained for purposes of security and aesthetics.

The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making. The range of potential alternatives to the proposed project shall also include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. 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). Only locations that would avoid or substantially lessen any of the project's significant effects need be considered for inclusion. An alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative need not be considered.

Only those impacts found significant and unavoidable are relevant in making the final determination of whether an alternative is environmentally superior or inferior to the proposed project. The proposed project would result in significant and unavoidable impacts involving Air Quality (for NO<sub>x</sub> emissions only) under the following scenarios:

- Short-Term Regional Construction Air Emissions;
- Long-Term Regional Operational Air Emissions;
- Short-Term Cumulative Air Emissions; and
- Long-Term Cumulative Air Emissions.

Potential environmental impacts associated with the following alternatives are compared to impacts from the proposed project:

- Alternative 1.1 - "No Project/No Build" Alternative;
- Alternative 1.2 - "No Project/Reasonably Foreseeable Development - Development Agreement" Alternative;
- Alternative 2 - Reduced Residential and Civic Center Alternative; and
- Alternative 3 - Reduced Residential Alternative.

Throughout the following analysis, the alternatives' impacts are analyzed for Air Quality, Greenhouse Gas Emissions, and Biological Resources, as examined in [Sections 5.1, 5.2, and 5.3](#) of this EIR, respectively. In this manner, each alternative can be compared to the proposed project on an issue-by-issue basis. [Table 7-4, Comparison of Alternatives](#), which is included at the end of this Section, provides an overview of the alternatives analyzed and a comparison of each alternative's impact in relation to the proposed project. This Section also identifies alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process. Among the factors used to eliminate alternatives from detailed consideration are: failure to meet most of the basic project objectives; infeasibility; or inability to avoid significant environmental impacts. [Section 7.4 Environmentally Superior Alternative](#), references the "environmentally superior" alternative, as required by the *CEQA Guidelines*.

## 7.1 "NO PROJECT" ALTERNATIVE

CEQA requires the inclusion of a "No Build" scenario. The "No Project/No Build" Alternative (Alternative 1.1) includes a discussion and analysis of the existing conditions at the time the Notice of Preparation was published on (May 11, 2011). The "No Project/Reasonably Foreseeable Development – Development Agreement" Alternative (Alternative 1.2) includes a discussion and analysis of what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on the current General Plan and Planning/Zoning Code, and consistent with available infrastructure and community services. The No Project scenarios are described and



analyzed in order to enable the decisionmakers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project.

## **7.1.1 “NO PROJECT/NO BUILD” ALTERNATIVE**

### **DESCRIPTION OF ALTERNATIVE**

The project site is largely undeveloped with the exception of the on-going Irvine Ranch Water District (IRWD) uses at the southern portion of the property. The undeveloped northern portion was historically used for agricultural purposes. The existing on-site structures include the former Baker Filter Treatment Building, two storage buildings, an administrative/office building, two above ground steel water tanks, and two below ground concrete water reservoirs. Additionally, multiple paved maintenance paths associated with these onsite uses traverse the property.

The No Project/No Build Alternative would retain the project site in its current condition. With this Alternative, the northern portion of the project site would remain vacant and unimproved. The current IRWD facilities located in the southern portion of the project site would continue to operate as under existing conditions. As with the proposed project, the Baker Building, two storage buildings, two above ground steel water tanks, and two below ground concrete water reservoirs would be retained under this Alternative. Under this Alternative, the administrative/office building and associated parking lot would not be demolished or removed, rather would remain as they exist.

None of the buildings or improvements proposed as part of the project would be constructed. A new community of residential neighborhoods, a Civic Center, and parks and recreation facilities would not be developed. Under this Alternative, 608 dwelling units (DU), a 114,00-square foot (SF) Civic Center containing a Community Center, City Hall, and sheriff/police facilities, 4.7 acres of new parks, and a 1,500-SF recreation center would not be constructed. A new network of public collector roadways and private local streets, and the proposed drainage and water quality improvements would not be constructed. Additionally, the proposed hardscape (i.e., perimeter walls, walkways, and entrance driveways) and landscape improvements would not be installed. The project's proposed grading, which would involve approximately 860,000 cubic yards (CY) of cut and approximately 860,000 CY of fill would not occur. The project site would continue to slope south, toward Serrano Creek, and the onsite elevations, which range from approximately 540 to 709 feet above mean sea level, would not be modified.

The following discussion evaluates the potential environmental impacts associated with the No Project/No Build Alternative, as compared to impacts from the proposed project.

## **IMPACT COMPARISON TO THE PROPOSED PROJECT**

### **Air Quality**

Short-term air quality impacts from demolition, grading, and construction activities would not occur with the No Project/No Build Alternative. The project's construction-related NO<sub>x</sub> emissions would exceed South Coast Air Quality Management District (SCAQMD) thresholds. Therefore, the



significant and unavoidable short-term air quality impacts for NO<sub>x</sub> that would occur with the proposed project would be avoided with this Alternative.

Long-term air quality impacts from mobile and area source pollutant emissions would not occur with the No Project/No Build Alternative. The project's long-term combined mobile and area source pollutant emissions would exceed SCAQMD thresholds. Therefore, the significant and unavoidable long-term air quality impacts for NO<sub>x</sub> that would occur with the proposed project would be avoided with this Alternative.

### **Greenhouse Gas Emissions**

Greenhouse gas emissions from construction and operational activities would not occur with the No Project/No Build Alternative. Comparatively, less than significant short-term and operational greenhouse gas emission impacts would occur with the proposed project, while no impacts would occur with this Alternative. The project's combined construction and operational greenhouse gas emissions would result in a less than significant cumulatively considerable impact, whereas, this Alternative would result in no greenhouse gas emissions.

The No Project/No Build Alternative would be environmentally superior to the proposed project regarding greenhouse gas emissions because no greenhouse gas emissions would result from construction.

### **Biological Resources**

Under the No Project/No Build Alternative, no construction activities would occur, and the project site would remain in its current condition. Therefore, there would be no impacts to special status species, sensitive vegetation communities, wetlands, jurisdictional waters, wildlife movement corridors, or migratory birds. Additionally, the No Project/No Build Alternative would not conflict with local policies, ordinances, or the County of Orange Central and Coastal Subregion Natural Community Conservation Plan and Habitat Conservation Plan (NCCP/HCP). Impacts with regard to biological resources under the proposed project would be less than significant. However, under the No Project/No Build Alternative, no impacts would occur.

## **ABILITY TO MEET PROJECT OBJECTIVES**

The No Project/No Build Alternative would attain one project objective: to allow the existing IRWD water treatment facility operations to be retained. However, this Alternative would not attain most of the project's basic objectives. The property would not be developed in accordance with the General Plan Medium Density Residential (between 15-25 units per acre) and Public Facility land use designations. The entire community would not benefit from funding for public facilities, which would be made available through the payment of fees required for development of the project's proposed residential uses. The entire community would also not benefit from the provision of public open space (public parks and trail connections to existing regional trails) and the dedication of a site for a future Civic Center. A diversity of housing types, which would ensure that housing is available to residents with a range of incomes, would not be provided at this location.



## 7.1.2 “NO PROJECT/REASONABLY FORESEEABLE DEVELOPMENT – DEVELOPMENT AGREEMENT” ALTERNATIVE

### DESCRIPTION OF ALTERNATIVE

The “No Project/Reasonably Foreseeable Development – Development Agreement” Alternative proposes development of what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on the current General Plan designation, the *Development Agreement Between City of Lake Forest and Irvine Ranch Water District* (Development Agreement), and consistent with available infrastructure and community services. The Development Agreement, which was recorded on October 22, 2008, entitles the property owner to develop a maximum of 833 residential units, including appurtenant facilities, and a Civic Center, on approximately 82 acres of land, as permitted by the Development Plan; refer to Development Agreement Section 8.1, *Owner’s Vested Right*. Accordingly, this Alternative assumes development of 833 DU on the 82 acres, including 150 single-family detached units, 458 condominium units, and 225 apartment units. The non-residential land uses (i.e., private recreation center and Civic Center) are also proposed under this Alternative. Additionally, the current IRWD facilities located in the southern portion of the project site (17 acres) would continue to operate as under existing conditions.

Table 7-1, *Comparison of Proposed Project and Reasonably Foreseeable Development – Development Agreement Alternative*, compares the proposed project and Reasonably Foreseeable Development – Development Agreement Alternative. This Alternative proposes an approximately 37 percent increase in dwelling units, with 225 additional apartment units, as compared to the proposed project. The proposed project’s non-residential land uses (115,500-SF) are also proposed under this Alternative, including a 1,500-SF private recreation center and 114,000-SF Civic Center. As to the remaining project components (i.e., parks and trails, open space and existing public facilities, circulation system, and grading) there would be no variation between the proposed project and the Reasonably Foreseeable Development – Development Agreement Alternative.

**Table 7-1  
Comparison of Proposed Project and  
Reasonably Foreseeable Development – Development Agreement Alternative**

Land Use	Trip Generation Rate	Project			Alternative 1.2: No Project/Reasonably Foreseeable Development - Development Agreement Alternative			Difference			Average Daily Trips	
		Dwelling Units	Square Feet	Average Daily Trips	Dwelling Units	Square Feet	Average Daily Trips	Dwelling Units	Square Feet	% Difference	Difference	% Difference
<b>Residential Uses</b>												
Single-Family Detached	9.57	150		1,436	150		1,436	0		0%	0	0%
Condominium	8.15	458		3,733	458		3,733	0		0%	0	0%
Apartment	6.72	0		0	225		1,512	+225		100%	+1,512	+100%
<i>Total Residential</i>		<i>608</i>		<i>5,168</i>	<i>833</i>		<i>6,680</i>	<i>+225</i>		<i>37%</i>	<i>+1,512</i>	<i>+29%</i>
<b>Private Recreation Center</b>												
Community Facility (SF)	45.5		1,500	68		1,500	68		0	0%	0	0%
<i>Total Priv. Rec. Center</i>			<i>1,500</i>	<i>68</i>		<i>1,500</i>	<i>68</i>		<i>0</i>	<i>0%</i>	<i>0</i>	<i>0%</i>
<b>Civic Center</b>												
Community Facility (SF)	45.5		20,000	910		20,000	910		0	0%	0	0%
Government Facility (SF)	27.92		94,000	2,624		94,000	2,624		0	0%	0	0%
<i>Total Civic Center</i>			<i>114,000</i>	<i>3,534</i>		<i>114,000</i>	<i>3,534</i>		<i>0</i>	<i>0%</i>	<i>0</i>	<i>0%</i>
<i>Total</i>		<i>608</i>	<i>115,500</i>	<i>8,770</i>	<i>+833</i>	<i>115,500</i>	<i>10,283</i>	<i>+225</i>	<i>0</i>		<i>+1,512</i>	<i>+17%</i>



The following discussion evaluates the potential environmental impacts associated with the No Project/Reasonably Foreseeable Development – Development Agreement Alternative (Development Agreement Alternative), as compared to impacts from the proposed project.

## IMPACT COMPARISON TO THE PROPOSED PROJECT

### Air Quality

Short-Term Construction Emissions. Short-term construction emissions would result from the Development Agreement Alternative's construction activities. Fugitive dust would be generated during demolition of the existing structures/improvements and grading of the site, and air pollutants would be emitted by construction equipment.

The greatest amount of PM<sub>10</sub> and PM<sub>2.5</sub> fugitive dust generation occurs during the construction phase due to site grading and excavation. The project's fugitive dust emissions were calculated as part of the site earthwork activity emissions; refer to Table 5.1-5, *Maximum Daily Pollutant Emissions During Construction*. With the application of Mitigation Measure AQ-1, the project's maximum mitigated fugitive dust emissions would be below SCAQMD thresholds. Given the Development Agreement Alternative's development footprint and grading would be similar to the proposed project, this Alternative's fugitive dust mitigated emissions would also be below SCAQMD thresholds. Therefore, as with the proposed project, this Alternative would result in less than significant impacts involving PM<sub>10</sub> and PM<sub>2.5</sub> fugitive dust emissions.

Exhaust emissions from construction activities are generated by the transport of machinery and materials to and from the project site, workers' vehicles in their daily commuting, and emissions produced on-site as the equipment is used. As presented in Table 5.1-5, the project's exhaust emissions would be below the established SCAQMD thresholds in each construction year, except the NO<sub>x</sub> emissions during 2015 construction activities, which would result in a significant impact. Despite implementation of Mitigation Measure AQ-2, the project's construction-related NO<sub>x</sub> emissions are considered significant and unavoidable. Comparatively, this Alternative's exhaust emissions would be greater than the proposed project's since, this Alternative would increase the construction and building footprints associated with residential uses by approximately 37 percent. This Alternative's construction exhaust emissions would exceed the established SCAQMD thresholds. Therefore, the significant and unavoidable short-term air quality impacts that would occur with the proposed project would occur also with this Alternative.

The application of asphalt and surface coatings creates ROG emissions, which are O<sub>3</sub> precursors. The project's ROG emissions would not exceed SCAQMD thresholds and therefore would be considered less than significant. Given the Development Agreement Alternative's construction and building footprints would be significantly greater than the project's, this Alternative's ROG emissions would exceed the SCAQMD thresholds. Therefore, unlike the proposed project, this Alternative would result in significant and unavoidable impacts involving ROG emissions.

Long -Term Operational Emissions. Long-term operational emissions would be generated by both stationary and mobile sources. Mobile sources are emissions from motor vehicles, including tailpipe and evaporative emissions. The project's unmitigated mobile source emissions would exceed



established SCAQMD thresholds for ROG, CO, PM<sub>10</sub>, and NO<sub>x</sub>; refer to [Table 5.1-6, \*Long-Term Operational Air Emissions\*](#). Despite implementation of Mitigation Measure GHG-1, NO<sub>x</sub> emissions would remain above SCAQMD thresholds. Therefore, the project's long-term operational NO<sub>x</sub> emissions from mobile sources are considered significant and unavoidable. The Development Agreement Alternative would increase the residential uses by approximately 37 percent, which would result in an approximately 17 percent increase in overall average daily trips (ADT) (an increase of approximately 1,512 ADT), as compared to the proposed project. This Alternative's mitigated mobile source emissions would exceed established SCAQMD thresholds for ROG, CO, PM<sub>10</sub>, and NO<sub>x</sub>. Therefore, the significant and unavoidable long-term air quality impacts due to NO<sub>x</sub> emissions from vehicle traffic that would occur with the proposed project would occur also with this Alternative, as well as significant and unavoidable long-term air quality impacts due to ROG, CO, and PM<sub>10</sub>.

Stationary source emissions would be generated due to a demand for electrical energy and natural gas for the proposed development. As indicated in [Table 5.1-6](#), stationary source emissions from the proposed project would exceed SCAQMD thresholds for NO<sub>x</sub> when combined with mobile source emissions, despite Mitigation Measure GHG-1. Due to the exceedance of SCAQMD thresholds for NO<sub>x</sub>, the project's impacts from area source emissions would be considered significant. Given the approximately 37 percent increase in residential land uses, the stationary source mitigated emissions from the Development Agreement Alternative would exceed SCAQMD thresholds when combined with mobile source emissions. Therefore, the significant and unavoidable long-term air quality impacts due to mobile source NO<sub>x</sub> emissions combined with stationary sources that would occur with the proposed project would occur also with this Alternative, as well as significant and unavoidable long-term air quality impacts due to ROG, CO, and PM<sub>10</sub>.

The No Project/Reasonably Foreseeable Development – Development Agreement Alternative would be environmentally inferior to the proposed project regarding air quality impacts due to increased short- and long-term emissions. Moreover, this Alternative would not avoid the project's significant and unavoidable short- and long-term air quality impacts, rather would result in additional significant and unavoidable impacts.

### **Greenhouse Gas Emissions**

Greenhouse gas emissions (GHG) emissions for “business as usual” conditions include direct project emissions from construction activities and operational activities (i.e., area and mobile sources), and indirect project emissions from energy and water demand, and solid waste generation. As indicated in [Table 5.2-1, \*Business As Usual Greenhouse Gas Emissions\*](#), the project's total “business as usual” GHG emissions from direct and indirect sources combined would total 13,259.99 MTCO<sub>2</sub>eq/yr. [Table 5.2-3, \*Mitigated Greenhouse Gas Emissions\*](#), shows the project's reduced GHG emissions associated with the project design features required by Mitigation Measure GHG-1, which would result in a 31.5 percent reduction in emissions from “business as usual” conditions and less than significant impacts. Given the Development Agreement Alternative would be required to incorporate Mitigation Measure GHG-1's project design features, this Alternative's GHG emissions would also achieve a minimum 28.5 percent reduction from business as usual emissions. Therefore,



as with the proposed project, this Alternative would result in less than significant impacts involving GHG emissions.

The No Project/Reasonably Foreseeable Development – Development Agreement Alternative would be environmentally inferior to the proposed project regarding greenhouse gas emissions. Although both the project and this Alternative would achieve a minimum 28.5 percent reduction from business as usual emissions, this Alternative would generate a greater amount of GHG emissions overall, given its approximately 37 percent increase in residential land uses.

### **Biological Resources**

Under the Development Agreement Alternative, construction activities would occur and would result in similar disturbance of the project site as the proposed project. Therefore, potential impacts to biological resources would be similar to those identified for the proposed project. Thus, the Development Agreement Alternative would be required to incorporate Mitigation Measures BIO-1 through BIO-5 in order to reduce potential impacts to special status species, sensitive vegetation communities, wetlands, jurisdictional waters, wildlife movement corridors, and migratory birds, as well as reduce the potential for conflict with the NCCP/HCP. Therefore, as with the proposed project, the Development Agreement Alternative would result in less than significant impacts with regard to biological resources with implementation of Mitigation Measures BIO-1 through BIO-5.

### **ABILITY TO MEET PROJECT OBJECTIVES**

The No Project/Reasonably Foreseeable Development – Development Agreement Alternative would partially fulfill the project's basic objectives. This Alternative proposes a total of 833 DU on 82 acres, or approximately 15 units per developable acre. Therefore, this Alternative would attain the project's objective to develop the property in accordance with the General Plan Medium Density Residential (between 15-25 units per acre). This Alternative would attain the project's objective to develop a minimum of 500 units, in order to ensure that fees paid as required by the Development Agreement are adequate to fund public facilities. The entire community would benefit from the provision of public open space (public parks and trail connections to existing regional trails) and a future Civic Center would be dedicated. To a greater degree than the project, this Alternative would attain the project's objective to provide a diversity of housing types, which would ensure that housing is available to residents with a range of incomes. This Alternative would ensure adequate internal circulation through street designs consistent with City standards. Additionally, this Alternative would allow the existing IRWD water treatment facility operations to be retained, ensuring adequate separation is provided between the facility and residential neighborhoods for security and aesthetic purposes.



## 7.2 “REDUCED RESIDENTIAL AND CIVIC CENTER” ALTERNATIVE

### DESCRIPTION OF ALTERNATIVE

As with the proposed project, the Reduced Residential and Civic Center Alternative provides for the development of a new community of residential neighborhoods, a Civic Center, parks and recreation facilities, and existing and future public facilities. Under this Alternative, a maximum of 486 DU is proposed including 120 single-family detached units and 366 condominium units. In accordance with the Public Facilities Overlay, this Alternative proposes a 91,200-SF Civic Center that is anticipated to contain a Community Center (16,000 SF), City Hall and sheriff/police facilities (75,200 SF), and parking. Additionally, approximately 4.2 acres of parks and a 1,200-SF recreation center are proposed. The current IRWD facilities located in the southern portion of the project site would continue to operate as under existing conditions. Overall, this Alternative would result in a total building floor space of 92,400 SF.

*Table 7-2, Comparison of Proposed Project and Reduced Residential and Civic Center Alternative*, compares the proposed project and Reduced Residential and Civic Center Alternative. Comparatively, this Alternative proposes a 20 percent decrease in dwelling units overall, with 30 fewer single-family detached units and 92 fewer condominium units than the proposed project. This Alternative also proposes a 20 percent decrease in overall non-residential floor space. The private recreation center would be reduced by 300 SF and the Civic Center by 22,800 SF. As to the remaining project components (i.e., parks and trails, open space and existing public facilities, circulation system, and grading) there would be no variation between the proposed project and the Reduced Residential and Civic Center Alternative.

**Table 7-2  
Comparison of Proposed Project and Reduced Residential and Civic Center Alternative**

Land Use	Trip Generation Rate	Project			Alternative 2: Reduced Residential and Civic Center Alternative			Difference		Average Daily Trips		
		Dwelling Units	Square Feet	Average Daily Trips	Dwelling Units	Square Feet	Average Daily Trips	Dwelling Units	Square Feet	% Difference	Difference	% Difference
<b>Residential Uses</b>												
Single-Family Detached	9.57	150		1,436	120		1,148	-30		-20%	-287	-20%
Condominium	8.15	458		3,733	366		2,983	-92		-20%	-750	-20%
<i>Total Residential</i>		<i>608</i>		<i>5,168</i>	<i>486</i>		<i>4,131</i>	<i>-122</i>		<i>-20%</i>	<i>-1,037</i>	<i>-20%</i>
<b>Private Recreation Center</b>												
Community Facility (SF)	45.5		1,500	68		1,200	55		-300	-20%	-14	-20%
<i>Total Priv. Rec. Center</i>			<i>1,500</i>	<i>68</i>		<i>1,200</i>	<i>55</i>		<i>-300</i>	<i>-20%</i>	<i>-14</i>	<i>-20%</i>
<b>Civic Center</b>												
Community Facility (SF)	45.5		20,000	910		16,000	728		-4,000	-20%	-182	-20%
Government Facility (SF)	27.92		94,000	2,624		75,200	2,100		-18,800	-20%	-525	-20%
<i>Total Civic Center</i>			<i>114,000</i>	<i>3,534</i>		<i>91,200</i>	<i>2,828</i>		<i>-22,800</i>	<i>-20%</i>	<i>-707</i>	<i>-20%</i>
<i>Total</i>		<i>608</i>	<i>115,500</i>	<i>8,770</i>	<i>486</i>	<i>92,400</i>	<i>7,013</i>	<i>-122</i>	<i>-23,100</i>	<i>-20%</i>	<i>-1,757</i>	<i>-20%</i>



## IMPACT COMPARISON TO THE PROPOSED PROJECT

### Air Quality

Short-Term Construction Emissions. Short-term construction emissions would result from the Reduced Residential and Civic Center Alternative's construction activities. Fugitive dust would be generated during demolition of the existing structures/improvements and grading of the site, and air pollutants would be emitted by construction equipment.

The greatest amount of PM<sub>10</sub> and PM<sub>2.5</sub> fugitive dust generation occurs during the construction phase due to site grading and excavation. The project's fugitive dust emissions were calculated as part of the site earthwork activity emissions; refer to [Table 5.1-5](#). With the application of Mitigation Measure AQ-1, the project's maximum mitigated fugitive dust emissions would be below SCAQMD thresholds. Given the Reduced Residential and Civic Center Alternative's development footprint and grading would be similar to the proposed project, this Alternative's fugitive dust mitigated emissions would also be below SCAQMD thresholds. Therefore, as with the proposed project, this Alternative would result in less than significant impacts involving PM<sub>10</sub> and PM<sub>2.5</sub> fugitive dust emissions.

Exhaust emissions from construction activities are generated by the transport of machinery and materials to and from the project site, workers' vehicles in their daily commuting, and emissions produced on-site as the equipment is used. As presented in [Table 5.1-5](#), the project's exhaust emissions would be below the established SCAQMD thresholds in each construction year, except the NO<sub>x</sub> emissions during 2015 construction activities, which would result in a significant impact. Despite implementation of Mitigation Measure AQ-2, the project's construction-related NO<sub>x</sub> emissions are considered significant and unavoidable. Comparatively, this Alternative's exhaust emissions would be less than the proposed project's, given this Alternative would decrease the overall construction and building footprints (approximately 20 percent reduction in both residential and non-residential uses). This Alternative's construction exhaust emissions would be below the established SCAQMD thresholds. Therefore, the significant and unavoidable short-term air quality impacts that would occur with the proposed project would be avoided with this Alternative.

The application of asphalt and surface coatings creates ROG emissions, which are O<sub>3</sub> precursors. The project's ROG emissions would not exceed SCAQMD thresholds and therefore would be considered less than significant. Given the Reduced Residential and Civic Center Alternative's construction and building footprints would be approximately 20 percent less than the project's, this Alternative's ROG emissions would also be below SCAQMD thresholds. Therefore, as with the proposed project, this Alternative would result in less than significant impacts involving ROG emissions.

Long -Term Operational Emissions. Long-term operational emissions would be generated by both stationary and mobile sources. Mobile sources are emissions from motor vehicles, including tailpipe and evaporative emissions. The project's unmitigated mobile source emissions would exceed established SCAQMD thresholds for ROG, CO, PM<sub>10</sub>, and NO<sub>x</sub>; refer to [Table 5.1-6](#). Despite implementation of Mitigation Measure GHG-1, NO<sub>x</sub> emissions would remain above SCAQMD thresholds. Therefore, the project's long-term operational NO<sub>x</sub> emissions from mobile sources are



considered significant and unavoidable. The Reduced Residential and Civic Center Alternative proposes an approximately 20 percent reduction in both residential and non-residential uses, which would result in a proportionate decrease in average daily trips (ADT) (a reduction of approximately 1,757 ADT), as compared to the proposed project. This Alternative's mitigated mobile source emissions would not exceed established SCAQMD thresholds for ROG, CO, PM<sub>10</sub>, or NO<sub>x</sub>. Therefore, the significant and unavoidable long-term air quality impacts due to NO<sub>x</sub> emissions from vehicle traffic that would occur with the proposed project would be avoided with this Alternative.

Stationary source emissions would be generated due to a demand for electrical energy and natural gas for the proposed development. As indicated in [Table 5.1-6](#), stationary source emissions from the proposed project would exceed SCAQMD thresholds for NO<sub>x</sub> when combined with mobile source emissions, despite Mitigation Measure GHG-1. Due to the exceedance of SCAQMD thresholds for NO<sub>x</sub>, the project's impacts from area source emissions would be considered significant. Given the approximately 20 percent reduction in land uses, the stationary source mitigated emissions from the Reduced Residential and Civic Center Alternative would not exceed SCAQMD thresholds when combined with mobile source emissions. Therefore, the significant and unavoidable long-term air quality impacts due to mobile source NO<sub>x</sub> emissions combined with stationary sources that would occur with the proposed project would be avoided with this Alternative.

The Reduced Residential and Civic Center Alternative would be environmentally superior to the proposed project regarding air quality impacts due to decreased short- and long-term emissions. Moreover, this Alternative would avoid the project's significant and unavoidable short- and long-term air quality impacts.

### **Greenhouse Gas Emissions**

Greenhouse gas emissions (GHG) emissions for "business as usual" conditions include direct project emissions from construction activities and operational activities (i.e., area and mobile sources), and indirect project emissions from energy and water demand, and solid waste generation. As indicated in [Table 5.2-1](#), the project's total "business as usual" GHG emissions from direct and indirect sources combined would total 13,259.99 MTCO<sub>2</sub>eq/yr. [Table 5.2-3](#) shows the project's reduced GHG emissions associated with the project design features required by Mitigation Measure GHG-1, which would result in a 31.5 percent reduction in emissions from "business as usual" conditions and less than significant impacts. Given the Reduced Residential and Civic Center Alternative would be required to incorporate Mitigation Measure GHG-1's project design features, this Alternative's GHG emissions would also achieve a minimum 28.5 percent reduction from business as usual emissions. Therefore, as with the proposed project, this Alternative would result in less than significant impacts involving GHG emissions.

The Reduced Residential and Civic Center Alternative would be environmentally superior to the proposed project regarding greenhouse gas emissions. Although both the project and this Alternative would achieve a minimum 28.5 percent reduction from business as usual emissions, this Alternative would generate less GHG emissions overall, given its approximately 20 percent reduction in land uses.



## Biological Resources

Under the Reduced Residential and Civic Center Alternative, construction activities would occur and would result in similar disturbance of the project site as the proposed project. Therefore, potential impacts to biological resources would be similar to those identified for the proposed project. Thus, the Reduced Residential and Civic Center Alternative would be required to incorporate Mitigation Measures BIO-1 through BIO-5 in order to reduce potential impacts to special status species, sensitive vegetation communities, wetlands, jurisdictional waters, wildlife movement corridors, and migratory birds, as well as reduce the potential for conflict with the NCCP/HCP. Therefore, as with the proposed project, the Reduced Residential and Civic Center Alternative would result in less than significant impacts with regard to biological resources with implementation of Mitigation Measures BIO-1 through BIO-5.

## ABILITY TO MEET PROJECT OBJECTIVES

The Reduced Residential and Civic Center Alternative would only partially attain the project's basic objectives. This Alternative proposes a total of 486 DU on 44 acres, or approximately 11.0 units per acre. Therefore, this Alternative would not attain the project's objective to develop the property in accordance with the General Plan Medium Density Residential (between 15-25 units per acre). Additionally, this Alternative would not attain the project's objective to develop a minimum of 500 units, in order to ensure that fees paid as required by the Development Agreement are adequate to fund public facilities. Therefore, the community would not benefit from project contributions towards public facilities, since the fees paid through this Alternative's residential uses would not provide adequate funding. Notwithstanding, the entire community would benefit from the provision of public open space (public parks and trail connections to existing regional trails) and the dedication of a site for a future Civic Center. Although to a lesser degree than the proposed project, the Reduced Residential and Civic Center Alternative would attain the project's objective to provide a diversity of housing types, which would ensure that housing is available to residents with a range of incomes. Suitable access to the Civic Center site, while minimizing traffic impacts on existing residential neighborhoods, would be facilitated. This Alternative would ensure adequate internal circulation through street designs consistent with City standards. Additionally, this Alternative would allow the existing IRWD water treatment facility operations to be retained, ensuring adequate separation is provided between the facility and residential neighborhoods for security and aesthetic purposes.

## 7.3 "REDUCED RESIDENTIAL" ALTERNATIVE

### DESCRIPTION OF ALTERNATIVE

As discussed in Section 3.0, *Project Description*, this EIR analyzes a "Project Alternative" that would exclude the Civic Center, allowing in its place the development of additional residential uses. As to the remaining project components, there is no variation between the proposed project and the Project Alternative. Accordingly, the following analysis compares the Reduced Residential Alternative to the Project Alternative, as examined in Sections 5.1, 5.2, and 5.3 of this EIR.



As with the Project Alternative, the Reduced Residential Alternative provides for the development of a new community of residential neighborhoods, parks and recreation facilities, and existing and future public facilities. Under this Alternative, a maximum of 749 DU are proposed including 135 single-family detached units, 412 condominium units, and 202 apartment units. Additionally, approximately 4.2 acres of parks and a 1,350-SF recreation center are proposed. The current IRWD facilities located in the southern portion of the project site would continue to operate as under existing conditions. Overall, this Alternative would result in a total building floor space of 1,350 SF. Table 7-3, Comparison of Project Alternative and Reduced Residential Alternative, compares the Project Alternative and Reduced Residential Alternative. Comparatively, this Alternative proposes a ten percent decrease in dwelling units overall, with 15 fewer single-family detached units, 46 fewer condominium units, and 23 fewer apartment units than the Project Alternative. This Alternative also proposes a 10 percent decrease in overall non-residential floor space. The private recreation center would be reduced by 150 SF. As to the remaining project components (i.e., parks and trails, open space and existing public facilities, circulation system, and grading) there would be no variation between the Project Alternative and the Reduced Residential Alternative.

**Table 7-3  
 Comparison of Project Alternative and Reduced Residential Alternative**

Land Use	Trip Generation Rate	Project			Alternative 3: Reduced Residential Alternative			Difference		Average Daily Trips		
		Dwelling Units	Square Feet	Average Daily Trips	Dwelling Units	Square Feet	Average Daily Trips	Dwelling Units	Square Feet	% Difference	Difference	% Difference
<b>Residential Uses</b>												
Single-Family Detached	9.57	150		1,436	135		1,292	-15		-10%	-144	-10%
Condominium	8.15	458		3,733	412		3,358	-46		-10%	-375	-10%
Apartments	6.72	225		1,512	202		1,357	-23		-10%	-155	-10%
<i>Total Residential</i>		<i>833</i>		<i>6,680</i>	<i>749</i>		<i>6,007</i>	<i>-84</i>		<i>-10%</i>	<i>-673</i>	<i>-10%</i>
<b>Private Recreation Center</b>												
Community Facility (SF)	45.5		1,500	68		1,350	61		-150	-10%	-7	-10%
<i>Total Priv. Rec. Center</i>			<i>1,500</i>	<i>68</i>		<i>1,350</i>	<i>61</i>		<i>-150</i>	<i>-10%</i>	<i>-7</i>	<i>-10%</i>
<i>Total</i>		<i>833</i>	<i>1,500</i>	<i>6,748</i>	<i>749</i>	<i>1,350</i>	<i>6,069</i>	<i>-84</i>	<i>-150</i>	<i>-10%</i>	<i>-680</i>	<i>-10%</i>

## IMPACT COMPARISON TO THE PROPOSED PROJECT ALTERNATIVE

### Air Quality

Short-Term Construction Emissions. Short-term construction emissions would result from the Reduced Residential Alternative's construction activities. Fugitive dust would be generated during demolition of the existing structures/improvements and grading of the site, and air pollutants would be emitted by construction equipment. The greatest amount of PM<sub>10</sub> and PM<sub>2.5</sub> fugitive dust generation occurs during the construction phase due to site grading and excavation. Construction emissions associated with the Project Alternative would be similar to the proposed project. Therefore, the proposed project's emissions, which are presented in Table 5.1-5, pertain also to the Project Alternative. With the application of Mitigation Measure AQ-1, the Project Alternative's maximum mitigated fugitive dust emissions would be below SCAQMD thresholds. Given the Reduced Residential Alternative's development footprint and grading would be similar to the Project Alternative, this Alternative's fugitive dust mitigated emissions would also be below SCAQMD



thresholds. Therefore, as with the Project Alternative, this Alternative would result in less than significant impacts involving PM<sub>10</sub> and PM<sub>2.5</sub> fugitive dust emissions.

Exhaust emissions from construction activities are generated by the transport of machinery and materials to and from the project site, workers' vehicles in their daily commuting, and emissions produced on-site as the equipment is used. As presented in [Table 5.1-5](#), the Project Alternative's exhaust emissions (which would be consistent with the proposed project) would be below the established SCAQMD thresholds in each construction year, except the NO<sub>x</sub> emissions during 2015 construction activities, which would result in a significant impact. Despite implementation of Mitigation Measure AQ-2, the Project Alternative's construction-related NO<sub>x</sub> emissions are considered significant and unavoidable. Comparatively, this Alternative's exhaust emissions would be less than the Project Alternative's, given this Alternative would decrease the overall construction and building footprints (approximately ten percent reduction in both residential and non-residential uses). This Alternative's construction exhaust emissions would be below the established SCAQMD thresholds. Therefore, the significant and unavoidable short-term air quality impacts that would occur with the Project Alternative would be avoided with this Alternative.

The application of asphalt and surface coatings creates ROG emissions, which are O<sub>3</sub> precursors. The Project Alternative's ROG emissions would not exceed SCAQMD thresholds and therefore would be considered less than significant. Given the Reduced Residential Alternative's construction and building footprints would be approximately ten percent less than the Project Alternative's, this Alternative's ROG emissions would also be below SCAQMD thresholds. Therefore, as with the Project Alternative, this Alternative would result in less than significant impacts involving ROG emissions.

Long -Term Operational Emissions. Long-term operational emissions would be generated by both stationary and mobile sources. Mobile sources are emissions from motor vehicles, including tailpipe and evaporative emissions. The Project Alternative's unmitigated mobile source emissions would exceed established SCAQMD thresholds for ROG, CO, PM<sub>10</sub>, and NO<sub>x</sub>; refer to [Table 5.1-7, \*Project Alternative Long-Term Operational Air Emissions\*](#). Despite implementation of Mitigation Measure GHG-1, NO<sub>x</sub> emissions would remain above SCAQMD thresholds. Therefore, the Project Alternative's long-term operational NO<sub>x</sub> emissions from mobile sources are considered significant and unavoidable. The Reduced Residential Alternative proposes an approximately ten percent reduction in both residential and non-residential uses, which would result in a proportionate decrease in ADT (a reduction of approximately 680 ADT), as compared to the Project Alternative. This Alternative's mitigated mobile source emissions would not exceed established SCAQMD thresholds for ROG, CO, PM<sub>10</sub>, or NO<sub>x</sub>. Therefore, the significant and unavoidable long-term air quality impacts due to NO<sub>x</sub> emissions from vehicle traffic that would occur with the Project Alternative would be avoided with this Alternative.

Stationary source emissions would be generated due to a demand for electrical energy and natural gas for the proposed development. As indicated in [Table 5.1-7](#), stationary source emissions from the Project Alternative would exceed SCAQMD thresholds for NO<sub>x</sub> when combined with mobile source emissions, despite Mitigation Measure GHG-1. Due to the exceedance of SCAQMD thresholds for NO<sub>x</sub>, the Project Alternative's impacts from area source emissions would be considered significant. Given the approximately ten percent reduction in land uses, the stationary



source mitigated emissions from the Reduced Residential Alternative would not exceed SCAQMD thresholds when combined with mobile source emissions. Therefore, the significant and unavoidable long-term air quality impacts due to mobile source NO<sub>x</sub> emissions combined with stationary sources that would occur with the Project Alternative would be avoided with this Alternative.

The Reduced Residential Alternative would be environmentally superior to the Project Alternative regarding air quality impacts due to decreased short- and long-term emissions. Moreover, this Alternative would avoid the Project Alternative's significant and unavoidable short- and long-term air quality impacts.

### **Greenhouse Gas Emissions**

Greenhouse gas emissions (GHG) emissions for "business as usual" conditions include direct project emissions from construction activities and operational activities (i.e., area and mobile sources), and indirect project emissions from energy and water demand and solid waste generation. As indicated in Table 5.2-4, *Project Alternative Business As Usual Greenhouse Gas Emissions*, the Project Alternative's total "business as usual" GHG emissions from direct and indirect sources combined would total 12,762.16 MTCO<sub>2</sub>eq/yr. Table 5.2-5, *Project Alternative Mitigated Greenhouse Gas Emissions*, shows the Project Alternative's reduced GHG emissions associated with the project design features required by Mitigation Measure GHG-1, which would result in a 30.9 percent reduction in emissions from "business as usual" conditions and less than significant impacts. Given the Reduced Residential Alternative would be required to incorporate Mitigation Measure GHG-1's project design features, this Alternative's GHG emissions would also achieve a minimum 28.5 percent reduction from business as usual emissions. Therefore, as with the Project Alternative, this Alternative would result in less than significant impacts involving GHG emissions.

The Reduced Residential Alternative would be environmentally superior to the Project Alternative regarding greenhouse gas emissions. Although both the Project Alternative and this Alternative would achieve a minimum 28.5 percent reduction from business as usual emissions, this Alternative would generate less GHG emissions overall, given its approximately ten percent reduction in land uses.

### **Biological Resources**

Under the Reduced Residential Alternative, construction activities would occur and would result in similar disturbance of the project site as the proposed project. Therefore, potential impacts to biological resources would be similar to those identified for the proposed project. Thus, the Reduced Alternative would be required to incorporate Mitigation Measures BIO-1 through BIO-5 in order to reduce potential impacts to special status species, sensitive vegetation communities, wetlands, jurisdictional waters, wildlife movement corridors, and migratory birds, as well as reduce the potential for conflict with the NCCP/HCP. Therefore, as with the proposed project, the Reduced Residential Alternative would result in less than significant impacts with regard to biological resources with implementation of Mitigation Measures BIO-1 through BIO-5.



## ABILITY TO MEET PROJECT OBJECTIVES

The Reduced Residential Alternative would only partially attain the Project Alternative's basic objectives. This Alternative proposes a total of 749 DU on 56 acres, or approximately 13.0 units per acre. Therefore, this Alternative would not attain the project's objective to develop the property in accordance with the General Plan Medium Density Residential (between 15-25 units per acre). However, this Alternative would attain the project's objective to develop a minimum of 500 units, in order to ensure that fees paid as required by the Development Agreement are adequate to fund public facilities. Therefore, the community would benefit from this funding source for the public facilities, since the fees paid through this Alternative's residential uses would provide adequate funding. The entire community would also benefit from the provision of public open space (public parks and trail connections to existing regional trails). Although to a lesser degree than the Project Alternative, this Alternative would attain the project's objective to provide a diversity of housing types, which would ensure that housing is available to residents with a range of incomes. This Alternative would ensure adequate internal circulation through street designs consistent with City standards. Additionally, this Alternative would allow the existing IRWD water treatment facility operations to be retained, ensuring adequate separation is provided between the facility and residential neighborhoods for security and aesthetic purposes.

## 7.4 "ENVIRONMENTALLY SUPERIOR" ALTERNATIVE

Table 7-4, *Comparison of Alternatives*, summarizes the comparative analysis presented above (i.e., the alternatives compared to the proposed project). Review of Table 7-4 and the analysis presented above indicates the No Project/No Build Alternative is the environmentally superior alternative, because it would avoid the air quality, greenhouse gas, and biological resource impacts associated with development of the proposed project. According to *CEQA Guidelines* Section 15126.6(e), "No Project" Alternative, "if the environmentally superior alternative is the "no project" alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives." Accordingly, an environmentally superior alternative among the other alternatives is identified below. It is noted, the No Project/Reasonably Foreseeable Development – Development Agreement Alternative would be environmentally inferior to the proposed project regarding air quality and greenhouse gas impacts due to increased short- and long-term emissions.

Among the other alternatives, the environmentally superior alternative is the Reduced Residential and Civic Center Alternative, given it would achieve the greatest impact reductions in air quality and greenhouse gas emissions. Biological resource impacts would be similar to those of the proposed project under the Reduced Residential and Civic Center Alternative. As concluded in the analysis presented above, the Reduced Residential and Civic Center Alternative would lessen the impacts associated with development of the proposed project, because it would involve an approximately 20 percent decrease in both residential and non-residential uses, with corresponding decreases in construction activities, building footprints, and traffic volumes. These decreases would result in proportionate decreases in air quality and greenhouse gas emissions. It is noted, while the Reduced Residential Alternative would also lessen the impacts associated with development of the Project Alternative, because it would involve an approximately ten percent decrease in both residential and



non-residential uses, with corresponding decreases in construction activities, building footprints, and traffic volumes, its impact reductions would be to a lesser degree than the Reduced Residential and Civic Center Alternative. Namely, the Reduced Residential and Civic Center Alternative would achieve a 1,757 ADT reduction, whereas, the Reduced Residential Alternative would achieve a 680 ADT reduction. Moreover, the Reduced Residential and Civic Center Alternative's 7,013 ADT would not be significantly greater than the Reduced Residential Alternative's 6,069 ADT.

**Table 7-4  
 Comparison of Alternatives**

Impact Issue Areas	Alternative 1.1: No Project/ No Build Alternative	Alternative 1.2: No Project/ Reasonably Foreseeable Development – Development Agreement Alternative	Alternative 2: Reduced Residential and Civic Center Alternative	Alternative 3: Reduced Residential Alternative
Air Quality	▼	▲	▼	▼
Greenhouse Gas Emissions	▼	▲	▼	▼
Biological Resources	▼	=	=	=
▲ Indicates an impact that is greater than the proposed project (environmentally inferior). ▼ Indicates an impact that is less than the proposed project (environmentally superior). = Indicates an impact that is equal to the proposed project (neither environmentally superior nor inferior). * Indicates a significant and unavoidable impact.				

The Reduced Residential and Civic Center Alternative is considered environmentally superior to the proposed project, since it would avoid the significant and unavoidable project impacts involving air quality and greenhouse gas emissions. Additionally, this Alternative would partially attain the project's objectives. However, this Alternative would not attain the project's basic objectives to develop the property in accordance with the General Plan Medium Density Residential (between 15-25 units per acre) or to develop a minimum of 500 units, in order to ensure that fees paid as required by the Development Agreement are adequate to fund public facilities.

## 7.5 ALTERNATIVES CONSIDERED BUT REJECTED FROM FURTHER ANALYSIS

The project site is part of the larger Opportunities Study Area (OSA) and is one of the City's seven remaining vacant properties. The Lake Forest Opportunities Study (OS) involved a systematic analysis of the project site and an additional six properties (838 acres), in order to amend their General Plan (and Zoning) designations from industrial and commercial uses to residential and commercial uses. The overall purpose of the OS was to examine the impacts and benefits of changes to the allowed land uses in the Opportunities Study Area (OSA). A phased approach to completion of the OS was conducted, which included consideration of conceptual plans from six OSA landowners (i.e., Landowner Concept Plan) involving residential and mixed uses. The land use changes proposed by the landowners were evaluated from planning, traffic, and fiscal perspectives and compared against the



industrial and commercial land uses currently allowed under the General Plan. Ultimately, a “Recommended Plan” was developed for further study, which consisted of development on six parcels and approval of a public facilities overlay on a portion of a seventh parcel. Collectively, the systematic analyses that were conducted as part of the OSA and *Opportunities Study Final Program Environmental Impact Report* discussed below encompass the alternative development scenarios for the project site (subject of this EIR) that were considered by the City of Lake Forest but were rejected as infeasible. The following summarizes the development scenarios that were considered, and presents the findings of the environmental impact analyses that were conducted.

The *City of Lake Forest Opportunities Study Final Program Environmental Impact Report* (OSA PEIR) was prepared to consider the potential environmental impacts that would result from implementation of the City’s proposed land use changes pursuant to the Recommended Plan. The project site, subject of this EIR, is one of the seven properties analyzed in the OSA PEIR. OSA PEIR Chapter 2.5, *Proposed Project*, details the proposed GPA and ZC of the seven properties involving 838 acres of vacant lands. The GPA and ZC involved development of 5,415 DU on Sites 1 through 6 and a public facilities overlay on Site 7. Approximately 50 acres of neighborhood parks, up to 45 acres of public facilities (sports park and Community Center/Civic Center), and 648,720 SF of commercial development were proposed. The proposed land uses are summarized in OSA PEIR Table 2-5, *Project Summary*, and illustrated on OSA PEIR Figure 2-4, *Proposed Project Land Use Map*. The project site, subject of this EIR, is analyzed as Site 3 (IRWD/Lewis) in the PEIR.

Pursuant to OSA PEIR Table 2-5, the OSA PEIR analyzed the development of a maximum of 833 dwelling units and a neighborhood park (conceptual) on Site 3 (the project site). The OSA PEIR concluded that the following significant and unavoidable impacts for Site 3 would occur with implementation of General Plan Amendment 2008-02C and Zone Change 2008-03:

- Aesthetics (Light and glare);
- Agricultural (Existing zoning for agricultural use);
- Air Quality (Threshold exceedances established by the SCAQMD and cumulative conditions);
- Hydrology (Water quality of receiving waterbodies for pesticides only);
- Noise (Cumulative long-term (2030 General Plan buildout) conditions; and
- Population and Housing (Inducing substantial population growth).

All other impacts for Site 3 were found to be less than significant through the existing standards, regulations, and/or mitigation measures imposed under the OSA PEIR. Comparatively, the Site 3 development analyzed in the OSA PEIR is similar to the Project Alternative analyzed in this EIR, which involves 833 DU and a 1,500 SF community facility.

OSA PEIR Chapter 4, *Alternatives to the Proposed Project*, analyzed the following alternatives to the project (i.e., the Recommended Plan) or to the location of the project:

- Alternative 1: No Project/Reasonably Foreseeable Development General Plan Alternative;
- Alternative 2: Development on Sites 1 through 6 and Public Facilities Overlay on Site 1;
- Alternative 3: Development on Sites 1 through 6 and Public Facilities Overlay on Sites 1, 3, and 4;



- Alternative 4: Development on Sites 1 through 6 and Public Facilities Overlay on Sites 4 and 9;
- Alternative 5: Landowner Concept Plan; and
- Alternative 6: Proposed Project Plus Public Facilities/Land Use Overlay on Site 7.

The land uses proposed under each alternative are summarized in OSA PEIR Tables 4-20, 4-23, 4-26, 4-29, and 4-52, respectively. The following alternatives were also considered infeasible and rejected from further consideration:

- General Plan Amendment and Zone Change for All-Commercial Development;
- General Plan Amendment and Zone Change for All-Residential Development;
- General Plan Amendment and Zone Change for All-Industrial/Business Park Development;
- General Plan Amendment and Zone Change for Industrial-Residential Alternative;
- Reduced Density Alternative; and
- Public Facilities Overlay on Sites 4 and 8.

Subsequent to the OSA PEIR public comment period, the City identified a new alternative for locating the public facilities. This new alternative (Alternative 7), which is a combination of several of the alternatives discussed in the OSA PEIR, is referred to as the “Hybrid Alternative.” The new Chapter 7, which was circulated for public review and analysis, describes the Alternative 7 (Hybrid Alternative) and provides additional information on significant changes or new information that occurred subsequent to circulation of the prior Draft OSA PEIR. The land uses proposed under Alternative 7 are summarized in Recirculated OSA PEIR Table 7.4-1.

From among the seven development alternatives analyzed in the OSA PEIR and Recirculated OSA PEIR, the environmentally superior alternative was concluded to be Alternative 7 (Hybrid Alternative), since it would reduce impacts to the greatest extent by reducing project trip generation and overall development. Pursuant to Recirculated OSA PEIR Table 7.4-1, Alternative 7 involves a maximum of 833 DU, 3.0 acres of parks, and 7.0 acres of public facilities on Site 3 (the subject site of this EIR). The OSA PEIR, which analyzed the environmental impacts associated with implementation of General Plan Amendment 2008-02C and Zone Changes 2008-01 through 2008-05, was certified in June 2008.

Overall, six alternatives to the Recommended Plan were analyzed in OSA PEIR Chapter 4. These involved development of the proposed project components (i.e., residential, parks/recreational, and public facilities (including a Civic Center), or a combination thereof, on the project site and six additional sites. Alternative 7 analyzed in Recirculated OSA PEIR Chapter 7 was identified as environmentally superior and is the “project” subject of this EIR. Therefore, the six alternatives analyzed in the OSA PEIR have been considered but rejected from further consideration.



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