6 Alternatives

6.1 Introduction

This chapter describes alternatives to the proposed Irvine Gateway Village Project (project), consistent with California Environmental Quality Act (CEQA) Guidelines Section 15126.6. This chapter presents the objectives of the project, a summary of its significant environmental impacts, and a description of the alternatives that were considered but eliminated from further consideration, followed by an analysis of the four alternatives evaluated, including the No Project/No Development alternative. A comparison of the three alternatives to the proposed project is provided and the environmentally superior alternative is identified.

According to CEQA Guidelines Section 15126.6, an environmental impact report (EIR) shall describe a range of reasonable alternatives to the project or to the location of the project that would feasibly attain most of the basic objectives of the project and could avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. This section of the CEQA Guidelines further requires that the discussion focus on alternatives capable of eliminating significant adverse impacts of the project or reducing them to a level of insignificance, even if these alternatives would impede to some degree the attainment of the project objectives or would be more costly. The alternatives analysis also should identify any significant effects that may result from a given alternative.

The lead agency is responsible for selecting a reasonable range of potentially feasible project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. The range of alternatives is governed by a "rule of reason" that requires the EIR to set forth only those potentially feasible alternatives necessary to permit a reasoned choice. The alternatives are limited to those that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR must examine in detail only those that the lead agency determines could feasibly attain most of the basic objectives of the project while substantially lessening any of the significant effects of the project. An EIR need not consider every conceivable alternative to a project. Rather, it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation.

An EIR is not required to consider alternatives which are infeasible. "Feasible" means capable of being accomplished in a successful manner within a reasonable period, taking into account economic, environmental, legal, social, and technological factors (CEQA Guidelines Section 15364). 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 (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site (or already owns the alternative site). None of these factors establishes a fixed limit on the scope of reasonable alternatives. Under CEQA case law, the concept of feasibility also "encompasses 'desirability' to the extent that desirability is based on a reasonable balancing of the relevant economic, environmental, social, and technological factors" (*City of Del Mar v. City of San Diego* [1982] 133 Cal.App.3d 410, 417; *California Native Plant Society v. City of Santa Cruz* [2009] 177 Cal.App.4th 957). In assessing the feasibility of alternatives, agency decision makers may also take account of the extent to which the alternatives meet or further the agency's underlying purpose or objectives in considering a proposed project (*Sierra Club v. County of Napa* [2004] 121 Cal.App.4th 1490, 1506–1509; *Citizens for Open Government v. City of Lodi* [2012] 296 Cal.App.4th 296, 314–315; *In re Bay–Delta Programmatic Environmental Impact Report Coordinated Proceedings* [2008] 43 Cal.4th 1143, 1165, 1166).

6.2 Project Objectives

CEQA Guidelines Section 15124(b) states that the project description of an EIR shall contain "a statement of the objectives sought by the proposed project." Section 15124(b) further states that "the statement of objectives should include the underlying purpose of the project."

The underlying purpose of the project is to develop a new residential community with a variety of housing types in north Irvine. The proposed project's specific objectives are as follows:

1. **Housing Stock.** Provide diverse housing types and opportunities within the City that address a variety of lifestyles, life stages, and economic segments of the marketplace.
2. **Affordable Housing.** Consistent with Goal 4 of the City's General Plan Housing Element, provide affordable housing to support balanced housing options at the least cost possible to residents.
3. **RHNA Goals.** Contribute new housing units to the City's housing stock, to help satisfy the State of California Regional Housing Needs Assessment (RHNA) for the 2021–2029 planning period, allowing the City to advance their fair share of regional housing growth goals.
4. **City Revenue Generation.** Generate net revenue for the City of Irvine General Fund.
5. **Attractive Community and Amenities.** Develop a cohesive architectural and landscape themed community with amenities that both residents and guests seek. Create gathering spaces and encourage outdoor vehicle-free movement by providing parks, paseos, streetside green spaces, and outdoor amenity areas. Establish recreational amenities within walking distance of residential neighborhoods.
6. **Circulation Network.** Complete the comprehensive circulation network with integrated mobility options by connecting pedestrians and bicyclists traveling to a non-vehicular bridge across Portola Parkway to the broader Irvine community to the south and west of Gateway Village. Establish connectivity between land uses through the extension of the JOST to its connection point with the 700-acre Gateway Preserve via the South Park trailhead, which sustains the City's goals to enhance quality living environments through parks and open space.

The ability of each alternative evaluated in detail to meet these project objectives is evaluated in Section 6.5, Alternatives Selected for Analysis in This Draft EIR, and in Table 6-1 (provided at the end of Chapter 6.6, Environmentally Superior Alternative).

6.3 Project Impact Summary

The range of alternatives studied in the EIR must be broad enough to permit a reasoned choice by decision makers when considering the merits of the project. The analysis should focus on alternatives that are potentially feasible. Under CEQA, alternatives that are remote or speculative should not be discussed. Furthermore, alternatives should focus on reducing or avoiding significant environmental impacts associated with the project as proposed.

This section provides a summary of the proposed project impacts and emphasizes topics for which one or more impacts were determined to be potentially significant or significant. A summary of the significant and unavoidable impacts of the project is also provided below, as well as in Chapter 1, Executive Summary. A comparative analysis of each alternative evaluated in detail in Section 6.5 is provided to determine whether the alternative would reduce the potentially significant or significant and unavoidable impacts of the proposed project (see also Table 6-2, which is provided at the end of Section 6.6).

6.3.1 Summary of Project Impacts

6.3.1.1 Potentially Significant Impacts

Agriculture and Forestry Resources

As described in Section 4.1, Agriculture and Forestry Resources (Chapter 4, Environmental Analysis), the proposed project would have no impact related to conflict with agricultural zoning or use or a Williamson Act contract; it would also not result in "other changes" such as edge effects resulting in the loss of agricultural land/uses. Furthermore, the proposed project would have no impact on forestry resources or forest lands. The proposed project would result in a significant and unavoidable impact related to the conversion of Prime and Unique Farmland; cumulative agricultural impacts were also determined to be significant and unavoidable. Impacts related to conversion of farmland, along with other significant and unavoidable project impacts, are discussed in more detail in Section 6.3.2.

Air Quality

As described in Section 4.3, Air Quality, proposed project impacts related to the exposure of sensitive receptors to pollutant concentrations would be potentially significant but would be reduced to less than significant with the implementation of Mitigation Measure (MM) AQ-1 (Construction Equipment Exhaust Minimization). The project would not result in significant impacts related to other emissions, such as those leading to odors, adversely affecting people. Project impacts related to conflict with or obstruction of an air quality plan and increase in criteria pollutants, as well as cumulative air quality impacts, were determined to be significant and unavoidable.

Biological Resources

As described in Section 4.4, Biological Resources, potentially significant impacts to special-status species would be mitigated through implementation of MM-BIO-1 (Avian Nest Avoidance), MM-BIO-2 (Demarcation of Disturbance Limits), MM-BIO-3 (Pre-Construction Burrowing Owl Survey), MM-BIO-4 (Least Bell's Vireo Mitigation), MM-BIO-5 (Crotch's Bumble Bee Pre-Construction Surveys), MM-BIO-6 (Biological Monitoring), and MM-BIO-7 (Coastal California Gnatcatcher Monitoring). Potentially significant impacts to wetlands and waters regulated by the RWQCB would be mitigated through implementation of MM-BIO-8 (Waters and Wetland Mitigation). Conflicts with local policies or ordinances protecting biological resources, which would be a potentially significant impact would be mitigated through compliance with MM-BIO-9 (Tree Ordinance Tree Inventory and Permit). All impacts would be less than significant with mitigation incorporated.

Cultural Resources

As described in Section 4.5, Cultural Resources, the proposed project would have no impact related to a change in significance of a historic resource. The project would have potentially significant impacts (related to an adverse change to an archaeological resource and potential disturbance to human remains); however, these impacts, along with cumulative cultural resources impacts, would be addressed and reduced to less-than-significant levels through the application of MM-CUL-1 (Cultural Resources Sensitivity Training), MM-CUL-2 (Cultural Resources Monitoring and Inadvertent Discovery Protocols), and MM-CUL-3 (Unanticipated Discovery of Human Remains).

Geology and Soils

As described in Section 4.7, Geology and Soils, the proposed project would have no impacts or less-than-significant impacts (not requiring mitigation measures) with regard to all impact thresholds except as related to paleontological resources. Impacts to paleontological resources and cumulative paleontological impacts were determined to be less than significant through the implementation of MM-GEO-1 (Paleontological Resources Impact Mitigation Program).

Greenhouse Gas Emissions

As described in Section 4.8, Greenhouse Gas Emissions, proposed project operations would exceed the City's threshold for GHG emissions, even after mitigation. MM-GHG-1 (Electric Vehicle Charging Infrastructure), which requires installation of electric vehicle (EV) charging infrastructure, would reduce mobile source GHG emissions by encouraging transition from fossil fuel vehicles to EVs by providing necessary infrastructure. MM-GHG-2 (Energy Conservation) involves various strategies to reduce energy consumption and associated GHG emissions by increasing energy efficiency. MM-GHG-3 (Water Use Efficiency and Water Conservation) requires water efficiency strategies to reduce water consumption and associated GHG emissions. MM-GHG 4 (Solid Waste Reduction) requires several strategies to reduce solid waste generation and associated GHG emissions. However, the GHG emissions reductions achieved by implementation of these mitigation measures for the project could not be reliably quantified. As such, implementation of these mitigation measures cannot demonstrate that GHG emissions would be mitigated to a less-than-significant level. As such, the project would result in significant and unavoidable project-specific and cumulative GHG impacts regardless of the application of MM-GHG-1 through MM-GHG-4.

Hazards and Hazardous Materials

As described in Section 4.9, Hazards and Hazardous Materials, proposed project impacts related to the transport, use, or disposal of hazardous materials; hazard to the public from upset and accidental release of hazardous materials; and cumulative hazardous materials impacts would be potentially significant. However, these impacts were determined to be less than significant with the implementation of MM-HAZ-1 (Pre-Demolition Hazardous Materials Abatement) and MM-HAZ-2 (Soil Management Plan). Impacts associated with wildfire hazards would be addressed by implementing safety requirements before construction, including establishment of temporary access roads, fuel modification zones, and phased site access as required by MM-WF-1, as well as introducing a fire-resistant landscape plan for operation of the project as required by MM-WF-2. With implementation of MM-WF-1 and MM-WF-2, impacts associated with exposure of people or structures to significant risk of loss, injury, or death, would be reduced to less than significant. The proposed project was determined to have either no impact or less-than-significant impacts in terms of the other impact thresholds in this section.

Land Use and Planning

As described in Section 4.14, Land Use and Planning, the proposed project would result in no impact related to physically dividing an established community. However, the proposed project would conflict with certain key attributes of the 2022 CARB Scoping Plan Update, Appendix D. Therefore, the proposed project would conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, resulting in significant and unavoidable land use and planning impacts at the project level and cumulatively, despite implementation of MM-GHG-1 through MM-GHG-4 and other mitigation measures ensuring consistency with the City's General Plan.

Recreation

As described in Section 4.15, Recreation, the proposed project would result in a less-than-significant impact related to the deterioration of existing neighborhood and regional parks. However, the proposed project would result in significant and unavoidable impacts regarding the construction or expansion of recreational facilities, as well as cumulative impacts, despite implementation of mitigation measures specified throughout the Draft EIR that would be applicable to recreational resources impacts.

Transportation

As described in Section 4.16, Transportation, the proposed project would have less-than-significant impacts related to potential conflict with transportation plans, programs, ordinances, or policies as well as emergency access; none of these impacts require mitigation measures. The project would result in a less-than-significant impact, with implementation of MM-TRA-4 (Traffic Signal Installation), with regard to potential transportation hazards. Finally, the project would result in significant and unavoidable impacts related to vehicle miles traveled (VMT) and cumulative transportation effects even after the implementation of MM-TRA-1 (Affordable and Below Market Rate Housing), MM-TRA-2 (Pedestrian Network Improvement), MM-TRA-3 (Expanded Bikeway Network), and MM-TRA-4.

Tribal Cultural Resources

As described in Section 4.17, Tribal Cultural Resources, the proposed project would have a less-than-significant impact related to tribal cultural resources listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources. As described in that section, the project could have a potentially significant impact related to tribal cultural resources determined by a lead agency and California Native American tribes. However, this impact, along with cumulative tribal cultural resources impacts, would be addressed and reduced to a less-than-significant level through the application of MM-TCR-1 (Tribal Cultural Resources Monitoring).

Wildfire

As described in Section 4.19, Wildfire, the proposed project would result in potentially significant impacts related to wildfire exposure and installation and maintenance of infrastructure. These impacts were determined to be reduced to a less-than-significant level through the implementation of MM-WF-1 (Pre-Construction Requirements) and MM-WF-2 (Fire-Resistant Landscape Plan). The project was determined to have a less-than-significant impacts related to the impairment of an adopted emergency response plan or emergency evacuation plan as well as the exposure of people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

6.3.1.2 Other Impacts

All other impacts of the proposed project related to aesthetics (Section 4.1), energy (Section 4.6), hydrology and water quality (Section 4.10), noise (Section 4.12), population and housing (Section 4.13), public services (Section 4.14), and utilities and service systems (Section 4.18) would be less than significant or would not occur, as described in Chapter 4 of this Draft EIR and summarized in this chapter.

6.3.2 Significant and Unavoidable Project Impacts

As described in Chapter 4, Environmental Analysis, and as listed above, the proposed project would result in the following significant and unavoidable impacts that can be reduced through implementation of mitigation measures identified in Chapter 4 but not to less-than-significant levels. The significant and unavoidable impacts of the proposed project are summarized in Sections 6.3.2.1 through 6.3.2.5, organized by resource topic and threshold question.

6.3.2.1 Agriculture and Forestry

1. Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

The proposed project would convert 67.46 acres of agricultural farmland to non-agricultural uses, resulting in a significant and unavoidable project-specific and cumulative agricultural impact. There are no feasible mitigation measures to reduce the significance of this impact.

The project site includes 64.48 acres of Prime Farmland and 2.98 acres of Unique Farmland. Thus, the total Important Farmland on the project site is 67.46 acres. Under the proposed project, the site, including 67.46 acres of Important Farmland, would be converted to an urban, non-agricultural, residential use that would include parks, paseos, and an extension of the Jeffrey Open Space Trail (JOST).

Conversion of Important Farmland within the project site was considered and found significant in a previous EIR. The Northern Sphere Program EIR (City of Irvine 2002a) analyzed the impacts of converting agricultural lands and found that implementation of the General Plan Amendment and Zone Change covering the project site would result in significant and unavoidable impacts related to the conversion of Important Farmland. As discussed in the Northern Sphere Program EIR, mitigation measures involving the retention of agricultural land as well as the purchase or transfer of development rights to preserve agricultural land would be infeasible for the proposed project due to economic factors, such as escalating land costs, affecting general agricultural viability in the City and the region. Mitigation measures, such as the implementation of the City's Agricultural Legacy Program, contemplated in the Northern Sphere Program EIR, aimed at reducing or avoiding impacts related to the proposed project's loss of mapped Important Farmlands would not reduce agricultural impacts to a less-than-significant level because agricultural conversion has been occurring in the project vicinity since 2002. Furthermore, implementation of the proposed project would pose a conflict with the Agricultural Legacy Program, which is intended to reduce and partially mitigate agricultural impacts, specific to the project site, analyzed in the 2002 Northern Sphere EIR. Therefore, there are no feasible mitigation measures that would reduce or avoid the loss of 67.46 acres of mapped Important Farmland caused by the development of the proposed project.

6.3.2.2 Air Quality

1. Would the project conflict with or obstruct implementation of the applicable air quality plan?

The project would result in a significant and unavoidable impact relating to a potential conflict with the South Coast Air Quality Management District (SCAQMD) 2022 Air Quality Management Plan (AQMP) even after implementation of all feasible mitigation measures. This would also contribute to a significant impact on the cumulative level.

Criteria air pollutant emissions resulting from project operation would exceed the criteria pollutant thresholds established by SCAQMD for volatile organic compound (VOC) emissions. Potential conflict with the SCAQMD AQMP would be addressed though the implementation of MM-AQ-1 through MM-AQ-4, which would be required to reduce criteria air pollutant emissions during construction of the project. MM-AQ-1 (Construction Equipment Exhaust Minimization) would require the use of Tier 4 Final construction equipment for off-road equipment over 50 horsepower. MM-AQ-2 (Additional Construction Equipment Emission Reductions) would require additional equipment reductions through the use of alternatively fueled equipment over 25 horsepower where commercially available. MM-AQ-3 (Use of Super-Compliant Low-VOC Paint During Construction) would require the use of low-VOC architectural coatings during construction. MM-AQ-4 would limit truck and equipment idling to 5 minutes during construction. To reduce VOC emissions during operation, the project would also implement MM-AQ-5 (Low-VOC Cleaning Supplies and Paint Educational Program) and MM-AQ-6 (Use of Low-VOC Cleaning Supplies and Paint for Spaces Operated by Homeowner's Association). Moreover, MM-AQ-7 (Use of Zero-Emission Landscape Equipment for Homeowner's Association Land), MM-AQ-8 (Landscape Maintenance Equipment Emission Reduction), and MM-GHG-1 (Installation of Additional Electric Vehicle Chargers Beyond Title 24 Compliance) would also be applicable to reduce operational emissions.

Even with implementation of all applicable mitigation measures described above (MM-AQ-1 through MM-AQ-8 and MM-GHG-1), the project would exceed SCAQMD's mass daily regional operational thresholds. As such, the project's criteria air pollutant emissions would be significant and unavoidable. Therefore, the project would have the potential to increase the frequency or severity of a violation of federal or state ambient air quality standards. Because the project would generate emissions that exceed the SCAQMD regional thresholds, the project would be inconsistent with the AQMP, resulting in a significant and unavoidable impact.

2. Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Proposed project operational emissions would continue to exceed the SCAQMD significance threshold for VOCs even after implementation of mitigation measures. Accordingly, the potential of the project to violate any air quality standard or contribute substantially to an existing or projected air quality violation with mitigation would be a significant and unavoidable impact. This would also contribute to a significant impact on the cumulative level.

The project-generated construction activities would result in criteria air pollutant emissions, but they would be below the SCAQMD construction thresholds after accounting for implementation of MM-AQ-1 through MM- AQ-4. Operation of the proposed project would exceed the criteria air pollutant operational thresholds established by the SCAQMD for emissions of VOCs even after the implementation of MM-AQ-1 through MM- AQ-8 and MM-GHG-1 (summarized above). Similarly, the overlapping construction and operation emissions during the interim operation phases would exceed the criteria air pollutant operational thresholds established by SCAQMD for emissions of VOCs and oxides of nitrogen (NO_x), resulting in a significant and unavoidable operational emissions impact even after the implementation of all feasible mitigation.

6.3.2.3 Greenhouse Gas Emissions

1. Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

The proposed project could generate greenhouse gas (GHG) emissions, either directly or indirectly, that may have a significant impact on the environment. Emissions during project operations would exceed the SCAQMD threshold, even after mitigation. This would also contribute to a significant impact on the cumulative level.

The estimated total GHG emissions during construction would be approximately 15,357 metric tons (MT) carbon dioxide equivalent (CO_2e) over the construction period. Estimated project-generated construction emissions amortized over 30 years would be approximately 512 MT CO_2e per year. Operation of the project would result in approximately 12,507 MT CO_2e per year and would be approximately 13,019 MT CO_2e per year with amortized construction emissions. Operational emissions would be above the 3,000 MT CO_2e per year threshold recommended by the City, and GHG emissions associated with long-term operation of the project would be potentially significant**.**

As such, the project would implement MM-GHG-1 through MM-GHG-4 to reduce the GHG emissions associated with long-term operation of the project. MM-GHG-1 (Electric Vehicle Charging Infrastructure), which requires installation of EV charging infrastructure, would reduce mobile source GHG emissions by encouraging transition from fossil fuel vehicles to EVs by providing necessary infrastructure. MM-GHG-2 (Energy Conservation) involves various strategies to reduce energy consumption and associated GHG emissions by increasing energy efficiency. MM-GHG-3 (Water Use Efficiency and Water Conservation) requires water efficiency strategies to reduce water consumption and associated GHG emissions. MM-GHG-4 (Solid Waste Reduction) requires several strategies to reduce solid waste generation and associated GHG emissions. However, the GHG emissions reductions achieved by implementation of these mitigation measures for the project could not be reliably quantified. As such, implementation of these mitigation measures cannot demonstrate that GHG emissions would be mitigated to a less-than-significant level.

Therefore, because operational GHG emissions cannot feasibly be reduced to less than 3,000 MT CO_2e per year, the project would exceed the City's threshold for GHG emissions even with implementation of all feasible mitigation, resulting in a significant and unavoidable impact regarding the potential to generate GHG emissions.

2. Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

The proposed project would represent a potential conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. This would be a significant and unavoidable impact at both the project level and the cumulative level.

The project would conflict with key attributes of the 2022 California Air Resources Board Scoping Plan Update, Appendix D (CARB 2022), as well as the environmental goals of the Southern California Association of Governments 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy (SCAG 2024); therefore, the project would conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs despite implementation of the mitigation measures noted

above. Impacts to a potential conflict an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs would be significant and unavoidable, even after implementation of all feasible mitigation measures.

6.3.2.4 Land Use and Planning

2. Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

As described in Section 6.3.2.3, Greenhouse Gas Emissions, the proposed project would represent a potential conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs (an environmental effect). This represents a significant and unavoidable impact at both the project level and the cumulative level. This impact would not be reduced to a less-than-significant level despite implementation of the GHG mitigation measures noted above.

6.3.2.5 Recreation

2. Would the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

The proposed project would result in a significant and unavoidable impact related to the construction or expansion of recreational facilities that might have an adverse physical effect on the environment. As discussed in Chapter 4, Environmental Analysis, and summarized in Chapter 1, Executive Summary, the project would have significant and unavoidable impacts related to agriculture and forestry, air quality GHG emissions, and transportation. Because the proposed project includes the construction of parks and JOST extension, their potential adverse physical effects on the environment are assessed throughout this Draft EIR. Mitigation is required to reduce impacts in several environmental resource areas, as summarized in Table 1-1, Summary of Project Impacts. However, agricultural, air quality, GHG, and transportation impacts relating to the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment, would remain significant and unavoidable after mitigation; this would also contribute to a significant and unavoidable cumulative impact.

6.3.2.6 Transportation

2. Would the project conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?

The proposed project would have a significant and unavoidable impact related to conflicts or inconsistencies with CEQA Guidelines Section 15064.3(b) due to increased VMT, even after mitigation. This would also contribute to a significant impact on the cumulative level.

A VMT analysis was prepared using the Irvine Transportation Analysis Model V1.8. The analysis was prepared in accordance with the City's adopted Traffic Study Guidelines, which provide screening criteria and impact thresholds for evaluating a project's potential impact on VMT. The detailed analysis results are provided in Appendix I, Traffic Study. Three mitigation measures were identified as applicable measures for the proposed project to address VMT impacts: MM-TRA-1 (Affordable and Below Market Rate Housing), MM- TRA-2 (Pedestrian Network Improvement), and MM-TRA-3 (Expanded Bikeway Network).

Assuming that each proposed project mitigation measure could achieve its maximum VMT reduction value, the implementation of MM-TRA-1 through MM-TRA-3 could reduce VMT by a total of 9.5%, which is less than the project's expected VMT impact of 25.7%. Detailed calculations of the VMT reductions with mitigation are provided in Appendix I, Traffic Study. The mitigation measures are provided in full in Section 4.16.5 of this Draft EIR. Even with mitigation incorporated, the proposed project would have a significant and unavoidable impact on VMT.

6.4 Alternatives Considered but Eliminated

This section discusses alternatives that were considered but were eliminated from detailed consideration because they did not meet most of the basic project objectives; they were found to be infeasible for technical, environmental, or social reasons; or they did not avoid or substantially lessen significant environmental impacts of the proposed project. Section 15126.6(c) of the CEQA Guidelines indicates that the range of potential alternatives shall 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. The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible, and should briefly explain the reasons underlying the lead agency's determination. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are (1) failure to meet most of the basic project objectives, (2) infeasibility, or (3) inability to avoid significant environmental impacts.

As a result of the City's ongoing project planning process, the following alternatives were reviewed but eliminated from further consideration as alternatives to the proposed project, as explained below:

1. Alternative Location Within the City
2. Increased Residential Density/Modified Footprint

6.4.1 Alternative Location Within the City

CEQA does not require that an analysis of alternate sites always be included in an EIR. CEQA Guidelines Section 15126.6(f)(2) provides guidance regarding consideration of one or more alternative locations for a proposed project, stating that putting the project in another location should be considered if doing so would allow significant effects of the project to be avoided or substantially lessened. Only locations that would avoid or substantially lessen any of the significant effects of the project need to be considered for inclusion in the EIR. However, if the surrounding circumstances make it reasonable to consider an alternative site, then a project alternative should be considered and analyzed in the EIR. Pursuant to CEQA Guidelines Section 15126.6(f)(2), in making the decision to include or exclude analysis of an alternative site, the "key question and first step in analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need to be considered for inclusion in the EIR."

During the project planning process, alternative locations for the proposed project were considered. However, given that the majority of the City has been built out with urban development and uses, there are few available sites of a size that could support residential development of a similar size to the proposed project, which is proposed on an approximately 105-acre site. The project includes goals related to the creation of housing stock and enhancement of the City's circulation network. The project would include approximately 1,360 residential units as well as new development of parks, a community garden, paseos, and a 2,750-foot extension of the JOST. The project would

connect the 700-acre Gateway Preserve via the South Park trailhead, which sustains the City's goals to enhance quality living environments through parks and open space. The proposed project site is the only location where this connection could be achieved due to the built-out nature of the City. Therefore, this alternative has been eliminated from consideration.

6.4.2 Increased Residential Density/Modified Footprint

An alternative design including an increased residential density on a modified project site footprint was also considered during the project planning process. This alternative was designed to include 1,236 residential units on 82 gross acres; of this total, approximately 60% of the units would be composed of higher-density housing types such as attached townhomes and three-story apartment buildings, for a total of 927 market rate and 309 affordable units. This alternative would provide a higher-density housing option with both market rate and affordable unit types, with almost all clustered buildings. To accommodate this alternative, the project site layout would be changed from that of the proposed project. Due to the proposed increase in residential densities within a designated Very High Fire Hazard Severity Zone (VHFHSZ), development under this alternative would require a larger fuel modification zone to protect against potential wildfire risks. Under this alternative, development would need be sited farther away from Hicks Canyon Wash and/or Bee Canyon Road to the east to accommodate a larger fuel modification zone, thereby shifting and reducing the site's development footprint.

This modified design alternative was determined to be infeasible due to physical and financial constraints. The reduced project footprint would not allow for the same range of housing options as the proposed project; for the alternative to be financially viable, it would need to support denser residential unit types, contained in taller multifamily buildings, and fewer affordable unit types compared to the proposed project. Furthermore, the reduced project site footprint would result in less acreage available for on-site parks, community gardens, paseos, and other amenities for residents and the public. Another key consideration is the provision of homeowner's insurance for this alternative. It currently is difficult for new attached condominium/apartment developments sited in VHFHSZs to receive homeowner's insurance. This consideration further reduces the alternative's financial feasibility.

It is anticipated that the Increased Residential Density/Modified Footprint Alternative would not be able to meet several objectives of the proposed project. Specifically, this alternative would not provide diverse types of housing or the same amount of affordable housing as the proposed project. It would also not be able offer the same opportunity for parks, trails, and other public/residential amenities. For these reasons, this alternative has been eliminated from consideration.

6.5 Alternatives Selected for Analysis in This Draft EIR

This section describes the alternatives to the proposed project that were selected and analyzed according to CEQA Guidelines Section 15126.6(a) after elimination of some considered alternatives, as explained in Section 6.4, Alternatives Considered but Eliminated. The analyzed alternatives, including the No Project Alternative, represent a reasonable range of alternatives to the project that would feasibly attain most of the project's basic objectives and would avoid or substantially lessen the significant adverse environmental effects of the project, as listed in Section 6.3, Project Impact Summary, and described in detail in Chapter 4, Environmental Analysis.

The following three alternatives were selected for comparative analysis in this EIR and are described in detail in the subsections below:

1. **No Project/No Development.** This alternative involves the circumstances under which the project would not proceed and legacy agricultural uses would resume on the project site.
2. **No Project/Community Park.** This alternative involves the circumstances under which the project would not proceed and the project site would be developed solely with parks and recreational facilities, consistent with the project site's General Plan and zoning designations of Recreation. Development under this alternative would be consistent with City of Irvine Parks Master Plan, which identifies a new community park ("Gateway Park") on the proposed project site.
3. **Reduced Residential.** This alternative involves a reduced residential development scenario with fewer residential units and structures and a smaller buildout footprint than the proposed project. The alternative, consistent with the proposed project, includes parks, paseos, and an extension of the JOST. This alternative's residential unit count would be reduced by 30%: 645 market-rate units and 216 affordable units, for a total of 861 units. Accordingly, it is assumed that this alternative's residential development footprint would also be reduced by 30%. Therefore, this alternative is assumed to maintain more open space than the proposed project for residents and the public.

6.5.1 Alternative 1: No Project/No Development

6.5.1.1 Description

CEQA Guidelines Section 15126.6(e) generally provides that "[t]he 'no project' analysis shall discuss the existing conditions at the time the notice of preparation is published, … as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services." Section 15126(e)(3)(B) provides that, where, as here, a proposed project is something "other than a land use or regulatory plan," the "No Project" alternative is "the circumstance under which the project does not proceed." The purpose of describing and analyzing a No Project alternative is to allow decision makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project (CEQA Guidelines Section 15126.6[e][1]). "[W]here failure to proceed with the project will not result in preservation of existing environmental conditions, the analysis should identify the practical result of the project's non-approval and not create and analyze a set of artificial assumptions that would be required to preserve the existing physical environment" (CEQA Guidelines Section 15126.6[e][3][B]).

The underlying purpose of the proposed project is to provide housing stock. Under this No Project/No Development alternative, all existing conditions are generally based on those existing in 2024, when the Notice of Preparation (NOP) was released; at this time, the project site consists primarily of active agricultural fields with equipment storage and laydown areas in the northern portion of the site. According to the California Department of Conservation, the site includes 64.46 acres of designated prime farmland, with small areas of unique farmland (DOC 2020).

Under this alternative, none of the components of the proposed project would be implemented; there would be no development of residential units or extension of the JOST. The project site would continue to be available for agricultural uses. As noted in Section 4.2 of the EIR, despite the project site's Recreation zoning designation, agricultural activities have continued at the project site consistent with Objective L-10, Policy (k) of the General Plan Conservation and Open Space Element (City of Irvine 2002b). Under this alternative, it is assumed that agricultural uses would continue, consistent with this General Plan policy, and no future development of recreation, parks, or residential uses would occur.

The No Project/No Development alternative would not provide additional housing stock or provide an improved circulation network. As a result, the No Project/No Development alternative would require the City to pursue other projects to achieve these overarching objectives. These projects would require subsequent CEQA review.

6.5.1.2 Impact Analysis

Aesthetics

Under the No Project/No Development alternative, the proposed project would not be implemented. The existing conditions described in Section 4.1, Aesthetics, would be maintained because the proposed project development would not be implemented. All visual impacts of the project would be avoided with the No Project/No Development alternative (see Table 6-2). All aesthetic impacts that would be less than significant under the proposed project would be no impact under this alternative (no impact). Additionally, the less-than-significant cumulative impacts related to aesthetics would not occur under the No Project/No Development alternative (no impact).

Agriculture and Forestry Resources

Under the No Project/No Development alternative, the proposed project would not be implemented. The existing conditions described in Section 4.2, Agriculture and Forestry Resources, would be generally maintained because the proposed project development would not be implemented. All agricultural impacts of the proposed project would be avoided with the No Project/No Development alternative (see Table 6-2). Therefore, the significant and unavoidable impact related to the conversion of Prime Farmland associated with the proposed project would not occur under this alternative (no impact). The less-than-significant impact identified for the proposed project related to other changes in the existing environment that could result in the conversion of farmland would not occur with this alternative (no impact). Consistent with the proposed project, this alternative would also have no impact to forest lands and forestry resources. Additionally, the significant and unavoidable cumulative impacts related to agricultural resources would not occur with the No Project/No Development alternative (no impact).

Air Quality

Under the No Project/No Development alternative, the proposed project would not be implemented. The existing conditions described in Section 4.3, Air Quality, would be generally maintained because the proposed project development would not be implemented. All air quality impacts of the proposed project would be avoided with the No Project/No Development alternative (see Table 6-2). Therefore, the significant and unavoidable impact relating to a potential conflict with the SCAQMD 2022 AQMP would not occur under this alternative (no impact). Furthermore, the significant and unavoidable impact related to the cumulatively considerable increase in criteria air pollutants—specifically, operational emissions—would not occur under this alternative (no impact). The less-than-significant impact (with mitigation) identified for the proposed project related to the exposure of sensitive receptors to pollutant concentrations would not occur with this alternative (no impact). The less-than-significant impact identified for the proposed project related to other emissions would not occur with this alternative (no impact). Additionally, the significant and unavoidable cumulative impacts related to air quality would not occur with the No Project/No Development alternative (no impact).

Biological Resources

Under the No Project/No Development alternative, the proposed project would not be implemented. The existing conditions described in Section 4.4, Biological Resources, would be generally maintained because the proposed project development would not be implemented. All biological resource impacts of the proposed project would be avoided with the No Project/No Development alternative (see Table 6-2). Consistent with the proposed project, this alternative would have no impact on native wildlife nursery sites or conflict with the provisions of an adopted Habitat Conservation Plan or Natural Community Conservation Plan (no impact). The less-than-significant riparian habitat impact associated with the proposed project would not occur under this alternative (no impact). Furthermore, the less-than-significant impacts (with mitigation) related to special-status species, state or federally protected wetlands, and conflict with local policies protecting biological resources associated with the proposed project would not occur under this alternative (no impact). Additionally, the less-than-significant cumulative impacts related to cultural resources would not occur under the No Project/No Development alternative (no impact).

Cultural Resources

Under the No Project/No Development alternative, the proposed project would not be implemented. The existing conditions described in Section 4.5, Cultural Resources, would be generally maintained because the proposed project development would not be implemented. All cultural resource impacts of the proposed project would be avoided with the No Project/No Development alternative (see Table 6-2). Consistent with the proposed project, this alternative would continue to have no impact to historical resources (no impact). Furthermore, the less-than-significant impacts (with mitigation) related to archaeological resources and human remains associated with the proposed project would not occur under this alternative (no impact). Additionally, the less-than-significant cumulative impacts related to cultural resources would not occur under the No Project/No Development alternative (no impact).

Energy

Under the No Project/No Development alternative, the proposed project would not be implemented. The existing conditions described in Section 4.6, Energy, would be maintained because the proposed project development would not be implemented. All energy impacts of the project would be avoided with the No Project/No Development alternative (see Table 6-2). All energy impacts that would be less than significant under the proposed project would not occur under this alternative (no impact). Additionally, the less-than-significant cumulative impacts related to energy would not occur under the No Project/No Development alternative (no impact).

Geology and Soils

Under the No Project/No Development alternative, the proposed project would not be implemented. The existing conditions described in Section 4.7, Geology and Soils, would be generally maintained because the proposed project development would not be implemented. All geology and soils impacts of the proposed project would be avoided with the No Project/No Development alternative (see Table 6-2). Consistent with the proposed project, this alternative would continue to have no impact related to earthquake faulting. The less-than-significant impact (with mitigation) related to paleontological resources associated with the proposed project would not occur under this alternative (no impact). Less-than-significant impacts from the proposed project related to ground shaking, liquefaction, and landslides would be avoided under this alternative (no impact). Consistent with the proposed project, this alternative would continue to have no impact related to soil capability for the use of septic tanks or alternative wastewater systems because these components would not be installed. Additionally, the less-than-significant cumulative impacts related to geology and soils would not occur under the No Project/No Development alternative (no impact).

Greenhouse Gas Emissions

Under the No Project/No Development alternative, the proposed project would not be implemented. The existing conditions described in Section 4.8, Greenhouse Gas Emissions, would be generally maintained because the proposed project development would not be implemented. All GHG impacts of the proposed project would be avoided with the No Project/No Development alternative (see Table 6-2). Therefore, the significant and unavoidable impact relating to the generation of operational GHG emissions in conflict with the SCAQMD threshold would not occur under this alternative (no impact). Furthermore, the significant and unavoidable impact related to conflict with an applicable plan, policy, or regulation with the purpose of reducing GHG emissions would not occur under this alternative (no impact). Additionally, the significant and unavoidable cumulative impacts related to GHG emissions would not occur with the No Project/No Development alternative (no impact).

Hazards and Hazardous Materials

Under the No Project/No Development alternative, the proposed project would not be implemented. The existing conditions described in Section 4.9, Hazards and Hazardous Materials, would be generally maintained because the proposed project development would not be implemented. All hazards and hazardous materials impacts of the proposed project would be avoided with the No Project/No Development alternative (see Table 6-2). Therefore, the less-than-significant impact (with mitigation) related to the routine transport, use, and disposal of hazardous materials associated with the proposed project would not occur under this alternative (no impact). The less-than-significant impact related to impairment or interference with emergency response or evacuation plans would be avoided (no impact). The less-than-significant impact (with mitigation) related to exposure of people or structures to wildland fires would also be avoided (no impact). The less-than-significant impact (with mitigation) related to the potential release of hazardous materials would also not occur under this alternative (no impact). Consistent with the proposed project, this alternative would continue to have no impact related to hazardous emissions or materials in proximity to existing or proposed schools; being located on a hazardous materials site list compiled pursuant to California Government Code Section 65962.5; or being located near airport operations. Additionally, the less-than-significant cumulative impacts related to hazards and hazardous materials would not occur under the No Project/No Development alternative (no impact).

Hydrology and Water Quality

Under the No Project/No Development alternative, the proposed project would not be implemented. The existing conditions described in Section 4.10, Hydrology and Water Quality, would be maintained because the proposed project development would not be implemented. All hydrology and water quality impacts of the project would be avoided with the No Project/No Development alternative (see Table 6-2). All hydrology and water quality impacts that would be less than significant under the proposed project would not occur under this alternative (no impact). Additionally, the less-than-significant cumulative impacts related to hydrology and water quality would not occur under the No Project/No Development alternative (no impact).

Land Use and Planning

Under the No Project/No Development alternative, the proposed project would not be implemented. The existing conditions described in Section 4.11, Land Use and Planning, would be maintained because the proposed project development would not be implemented. All land use and planning impacts of the project would be avoided with the No Project/No Development alternative (see Table 6-2). The significant and unavoidable land use and planning impact related to conflict with an applicable plan, policy, or regulation with the purpose of avoiding or mitigating an

environmental effect would not occur under this alternative (no impact). Additionally, the significant and unavoidable cumulative impacts related to land use and planning would not occur under the No Project/No Development alternative (no impact).

Noise

Under the No Project/No Development alternative, the proposed project would not be implemented. The existing conditions described in Section 4.12, Noise, would be maintained because the proposed project development would not be implemented. All noise impacts of the project would be avoided with the No Project/No Development alternative (see Table 6-2). All noise impacts that would be less than significant under the proposed project would not occur under this alternative (no impact). Additionally, the less-than-significant cumulative impacts related to noise would not occur under the No Project/No Development alternative (no impact).

Population and Housing

Under the No Project/No Development alternative, the proposed project would not be implemented. The existing conditions described in Section 4.13, Population and Housing, would be maintained because the proposed project development would not be implemented. All population and housing impacts of the project would be avoided with the No Project/No Development alternative (see Table 6-2). All population and housing impacts that would be less than significant under the proposed project would not occur under this alternative (no impact). Additionally, the less-than-significant cumulative impacts related to population and housing would not occur under the No Project/No Development alternative (no impact).

Public Services

Under the No Project/No Development alternative, the proposed project would not be implemented. The existing conditions described in Section 4.14, Public Services, would be maintained because the proposed project development would not be implemented. All public services impacts of the project would be avoided with the No Project/No Development alternative (see Table 6-2). All public services impacts that would be less than significant under the proposed project would not occur under this alternative (no impact). Additionally, the less-than-significant cumulative impacts related to public services would not occur under the No Project/No Development alternative (no impact).

Recreation

Under the No Project/No Development alternative, the proposed project would not be implemented. The existing conditions described in Section 4.15, Recreation, would be generally maintained because the proposed project development would not be implemented. All recreation impacts of the proposed project would be avoided with the No Project/No Development alternative (see Table 6-2). The less-than-significant proposed project impact related to the increase in use of existing neighborhood and regional parks or other recreational facilities would not occur under this alternative (no impact). The significant and unavoidable impact relating to the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment, would not occur under this alternative (no impact). Additionally, the significant and unavoidable cumulative impacts related to recreation would not occur with the No Project/No Development alternative (no impact).

Transportation

Under the No Project/No Development alternative, the proposed project would not be implemented. The existing conditions described in Section 4.16, Transportation, would be generally maintained because the proposed project development would not be implemented. All transportation impacts of the proposed project would be avoided with the No Project/No Development alternative (see Table 6-2). Therefore, the significant and unavoidable impact related to conflicts or inconsistencies with CEQA Guidelines Section 15064.3(b) due to increased VMT would not occur under this alternative (no impact). The less-than-significant impacts (with mitigation) related to potential conflict with transportation programs, ordinances, or policies; increase in transportation hazards; and emergency access would also not occur under this alternative (no impact). Additionally, the significant and unavoidable cumulative impacts related to transportation would not occur with the No Project/No Development alternative (no impact).

Tribal Cultural Resources

Under the No Project/No Development alternative, the proposed project would not be implemented. The existing conditions described in Section 4.17, Tribal Cultural Resources, would be generally maintained because the proposed project development would not be implemented. All tribal cultural resource impacts of the proposed project would be avoided with the No Project/No Development alternative (see Table 6-2). Therefore, the less-than-significant impact related to tribal cultural resources listed or eligible for listing pursuant to Public Resources Code Section 5020.1(k) would be avoided (no impact). Furthermore, the less-than-significant impact (with mitigation) related to tribal cultural resources determined by the lead agency, considering the significance to a California Native American tribe, would not occur under this alternative (no impact). Additionally, the less-than-significant cumulative impacts (with mitigation) related to cultural resources would not occur under the No Project/No Development alternative (no impact).

Utilities and Service Systems

Under the No Project/No Development alternative, the proposed project would not be implemented. The existing conditions described in Section 4.18, Utilities and Service Systems, would be maintained because the proposed project development would not be implemented. All utilities and service systems impacts of the project would be avoided with the No Project/No Development alternative (see Table 6-2). All utilities and service systems impacts that would be less than significant under the proposed project would not occur under this alternative (no impact). Additionally, the less-than-significant cumulative impacts related to utilities and service systems would not occur under the No Project/No Development alternative (no impact).

Wildfire

Under the No Project/No Development alternative, the proposed project would not be implemented. The existing conditions described in Section 4.19, Wildfire, would be generally maintained because the proposed project development would not be implemented. All wildfire impacts of the proposed project would be avoided with the No Project/No Development alternative (see Table 6-2). Therefore, the less-than-significant impacts (with mitigation) related to the spread of wildfire and installation or maintenance of infrastructure that may exacerbate fire risk would not occur under this alternative (no impact). The less-than-significant impacts related to emergency response and evacuation and exposure of people or structures to significant risks as a result of runoff, post-fire slope instability, or drainage changes would not occur under this alternative (no impact). Additionally, the less-than-significant cumulative impacts related to wildfire would not occur under the No Project/No Development alternative (no impact).

6.5.1.3 Ability to Meet Project Objectives

The No Project/No Development alternative would not result in any physical changes to the project site. Under this alternative, the project site would continue to be available for legacy agricultural uses. The project site would not be developed with residential uses or improved with pedestrian or bicyclist facilities. Therefore, the No Project/No Development alternative would not meet any of the identified project objectives (see Table 6-1). In particular, this alternative would not provide housing stock or affordable housing to advance compliance with the City's RHNA Goals (Objective 1, Objective 2, and Objective 3); generate revenue for the City's General Fund (Objective 4); create an attractive community with private and public amenities (Objective 5); or improve the City's circulation network by establishing connectivity between land uses through the extension of the JOST (Objective 6).

6.5.2 Alternative 2: No Project/Community Park

6.5.2.1 Description

The purpose of the No Project alternative and associated analysis is provided in detail in Section 6.5.1, Alternative 1: No Project/No Development. As stated, the purpose of describing and analyzing a No Project alternative is to allow decision makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project (CEQA Guidelines Section 15126.6[e][1]). Alternative 2: No Project/Community Park provides another scenario under the no project scenario where the proposed project site is developed with its General Plan and zoning designations of Recreation rather than being left vacant or as continued agricultural uses. This alternative involves the circumstances under which the project does not proceed and the project site is developed solely with parks and recreational facilities, consistent with the project site's General Plan and zoning designations of Recreation. Development under this alternative would be consistent with City of Irvine Parks Master Plan, which identifies the new Gateway Park on the proposed project site. This park was envisioned to include both passive and active recreation opportunities as well as a linkage between the City and the Northern Open Space Preserve. The City's Parks Master Plan (City of Irvine 2017) envisioned the development of Gateway Park as follows:

> …(to include) four softball-soccer field overlays, six tennis courts, six basketball courts, one sand volleyball court, one handball court, a playground and a community center. Based on community outreach priorities identified in this Master Plan, as well as the fact that numerous sports fields and courts will be provided nearby at the OCGP [Orange County Great Park] Sports Park, there may be an opportunity to vary the amenities originally planned for this site. Considering the site's proximity to the Northern Open Space Preserve as well as its location at the terminus of the Jeffrey Open Space Trail, it may be possible to design the site as a link between Irvine and its surrounding open space, utilizing recreational amenities compatible with this context. A key feature of this park could be an 18-hole disc golf course, relocated from Deerfield Park. Gateway Park will include a dog park. Gateway may also be an ideal setting for an outdoor classroom, and/or art space, atelier, nature trails, universal or thematic playground or a large reservable picnic shelter/pavilion for events and programs.

As noted above, the underlying purpose of the proposed project is to provide housing stock and improve the City's circulation network. Under this No Project/Community Park alternative, all existing conditions are generally based on those existing in 2024, when the NOP was released; at this time, the project site consisted primarily of active agricultural fields, with equipment storage and laydown areas in the northern portion of the site.

Under the No Project/Community Park alternative, none of the residential components of the proposed project would be implemented; there would be no development of residential units. However, the project site would be developed with a new park that would extend the JOST and provide connectivity between existing urban land uses to the west of the project site through the extension of the JOST to its connection point with the 700-acre Gateway Preserve to the east. Under this alternative, it is assumed that existing agricultural uses would cease. The exact amount of surface-level ground disturbance required for this alternative is unknown at this time. For the purposes of this analysis, it is assumed that footprint of surface-level ground disturbance associated with the No Project/Community Park alternative could be as extensive as, but not exceed, that of the proposed project. It is also assumed that construction of this alternative would involve a shorter construction timeline, with fewer construction activities and equipment, as compared to the proposed project. In summary, this alternative would not provide additional housing stock; however, it would improve pedestrian and bicyclist connectivity. As a result, the No Project/Community Park alternative would require the City to pursue other projects to achieve all the overarching objectives, especially those involving housing. These projects would require subsequent CEQA review.

6.5.2.2 Impact Analysis

Aesthetics

Under the No Project/Community Park alternative, the proposed project would not be implemented. Under this alternative, it is assumed the project site would be developed with a community park that would include both active and passive forms of recreation. This alternative would require the conversion of land used for agricultural purposes to community park amenities. The less-than-significant impacts for aesthetics under the proposed project would also be less than significant for the No Project/Community Park alternative, but the impacts overall would be lessened.

As discussed in Section 4.1.4, Impacts Analysis, the development of a community park would involve the construction of structures, utilities, landscaping, and lighting that would alter the existing views across the project site, but because the development footprint would be less dense, the less-than-significant impact under the proposed project would be lessened under the No Project/Community Park alternative (less-than-significant impact, reduced). Similar to the project, the No Project/Community Park alternative would not impact scenic resources (no impact). With regard to conflicts with applicable zoning and other regulations governing scenic quality, impacts under the No Project/Community Park alternative would also be less than significant, but because this alternative would be consistent with the General Plan and zoning, the impacts would be lessened compared with the proposed project (less-than-significant impact, reduced). Both the proposed project and the No Project/Community Park alternative would introduce new sources of nighttime lighting, which would constitute a less-than-significant impact, but the No Project/Community Park alternative would have reduced impacts compared to the proposed project because there would be less lighting overall and after 10:00 p.m. night lighting at parks is reduced so as not to disturb surrounding residential areas (less-than-significant impact, reduced). Additionally, the less-than-significant cumulative impacts related to aesthetics would be lessened under the No Project/Community Park alternative (less-than-significant impact, reduced).

Agriculture and Forestry Resources

Under the No Project/Community Park alternative, the proposed project would not be implemented. Under this alternative, it is assumed that the project site would be developed with a community park that would include both active and passive forms of recreation. This alternative would require the conversion of agricultural land for the development of community park amenities. Therefore, the proposed project conditions, including the conversion of agricultural lands, would be similar to those described in Section 4.2, Agriculture and Forestry Resources. Under the

No Project/Community Park alternative, it is assumed that the conversion of 67.46 acres from agricultural (Important Farmland) to non-agricultural uses would occur for the development of a community park (significant and unavoidable impact) (see Table 6-2). The less-than-significant impact identified for the proposed project related to other changes in the existing environment that could result in the conversion of farmland would also be less than significant under this alternative because the community park use would not result in edge effects that would jeopardize adjacent agricultural uses. Consistent with the proposed project, this alternative would continue to have no impact on conflict with existing zoning for agricultural use or a Williamson Act contract, or conflict with existing zoning of forest land of timberland, or loss of forest lands and forestry resources, because it is located at the same site. Considering the impact discussion above, the significant and unavoidable cumulative impacts related to agricultural resources would also occur with the No Project/Community Park alternative due to the loss in Important Farmland.

Air Quality

Under the No Project/Community Park alternative, the proposed project would not be implemented. Under this alternative, it is assumed that the project site would be developed with a community park that would include both active and passive forms of recreation; it would also create a linkage for pedestrians and bicyclists from existing urban uses to the west, via extension of the JOST, with the 700-acre Gateway Preserve to the east. Implementation of this alternative would result in reduced air pollutant emissions in terms of construction and operation. Furthermore, this alternative would be consistent with City's General Plan land use designation of Recreation. It would not require a General Plan Amendment as the proposed project does; it would also therefore be consistent with SCAQMDs AQMP per its screening approach. According to Tier 1 of the SCAQMD AQMP screening thresholds, any project consistent with its jurisdiction's General Plan land use designation is also consistent with the district's AQMP. Therefore, unlike the proposed project, which would have significant and unavoidable impacts related to conflict with or obstruction of implementation of the applicable air quality plan, the No Project/Community Park alternative would not conflict with or obstruct implementation of the applicable air quality plan (less-than-significant impact) (see Table 6-2).

The significant and unavoidable proposed project impact related to the cumulatively considerable increase in criteria air pollutants, specifically, operational emissions, would be reduced under this alternative. The proposed project would result in a significant and unavoidable operational impact due to its modeled levels of VOCs, which are associated with consumer products use by residents, reapplication of architectural coatings, and the use of landscaping equipment. Although the No Project/Community Park alternative is anticipated to use landscaping equipment, it would not include consumer products use by residents or the reapplication of architectural coatings at nearly the same scale or frequency as the proposed project. Therefore, the alternative would not result in significant operational air pollutant emissions (less-than-significant impact).

The less-than-significant impact (with mitigation) identified for the proposed project related to the exposure of sensitive receptors to pollutant concentrations would occur at a reduced level under the No Project/Community Park alternative; this alternative would involve a shorter construction timeline, with fewer construction activities and equipment, and would involve operations resulting in pollutant concentrations with fewer health risks (less-than-significant impact). The less-than-significant impact identified for the proposed project related to other emissions would also have a less-than-significant impact under this alternative, but at a reduced level because the community park land use would not result in the emissions adversely affecting a substantial number of people; furthermore, unlike the proposed project, it would not emit odors generated from residential uses such as cooking or application of architectural coatings (less-than-significant impact, reduced). Additionally, considering the impacts described herein, the significant and unavoidable cumulative impacts related to air quality would be less than significant with the No Project/Community Park alternative (less-than-significant impact).

Biological Resources

Under the No Project/Community Park alternative, the proposed project would not be implemented. Under this alternative, it is assumed that the project site would be developed with a community park that would include both active and passive forms of recreation; it would also create a linkage for pedestrians and bicyclists from existing urban uses to the west, via extension of the JOST, with the 700-acre Gateway Preserve to the east. All biological resource impact conclusions of the proposed project would be the same under the No Project/Community Park alternative (see Table 6-2); this is explained because the amount of surface-level ground disturbance—which is the primary activity that could affect biological resources—required for this alternative is unknown at this time. For the purposes of this analysis, it is assumed that footprint of surface-level ground disturbance associated with the No Project/Community Park alternative could be as extensive as, but not exceed, that of the proposed project. Consistent with the proposed project, this alternative would continue to have impact on native wildlife nursery sites or conflict with the provisions of an adopted Habitat Conservation Plan or Natural Community Conservation Plan (no impact). The less-than-significant riparian habitat impact associated with the proposed project occur at the same degree under this alternative (less-than-significant impact). Furthermore, the less-than-significant impacts (with mitigation) related to special-status species, state or federally protected wetlands, and conflict with local policies protecting biological resources associated with the proposed project would be the same under this alternative (less-than-significant impact with mitigation). The same mitigation measures (MM-BIO-1 through MM-BIO-9) applied to the proposed project would be required to address these impacts under this alternative. Additionally, the less-than-significant cumulative impacts (with mitigation) related to biological resources would be the same under the No Project/Community Park alternative.

Cultural Resources

Under the No Project/Community Park alternative, the proposed project would not be implemented. Under this alternative, it is assumed that the project site would be developed with a community park that would include both active and passive forms of recreation; it would also create a linkage for pedestrians and bicyclists from existing urban uses to the west, via extension of the JOST, with the 700-acre Gateway Preserve to the east. All cultural resource impact conclusions of the proposed project would be the same under the No Project/Community Park alternative (see Table 6-2); this is explained because the amount of surface-level ground disturbance—which is the primary activity that could affect archaeological resources—required for this alternative is unknown at this time. For the purposes of this analysis, it is assumed that footprint of surface-level ground disturbance associated with the No Project/Community Park alternative could be as extensive as, but not exceed, that of the proposed project. Consistent with the proposed project, this alternative would continue to have no impact to historical resources. Furthermore, the less-than-significant impacts (with mitigation) related to archaeological resources and human remains associated with the proposed project would be the same under this alternative because it has the potential to involve the same amount of surface-level ground disturbance. The same mitigation measures (MM-CUL-1 through MM-CUL-3—sensitivity training, resource monitoring, and inadvertent discovery protocols) applied to the proposed project would be required to address these impacts under this alternative. Additionally, the less-than-significant cumulative impacts (with mitigation) related to cultural resources would be the same under the No Project/ Community Park alternative.

Energy

Under the No Project/Community Park alternative, the proposed project would not be implemented. Under this alternative, it is assumed the project site would be developed with a community park that would include both active and passive forms of recreation. This alternative would require the conversion of land used for agricultural purposes

to community park amenities. The less-than-significant impacts for energy under the proposed project would also be less than significant for the No Project/Community Park alternative, but the impacts overall would be lessened.

Energy impacts would be reduced because this alternative would involve the construction of fewer/smaller structures, thereby resulting in a shorter construction timeline and fewer construction activities and less equipment and energy use. This alternative would also result in smaller and fewer structures that would therefore have reduced energy demands once operational. Energy demand would also be comparatively reduced because the alternative proposes a community park use that has less demand for energy compared to the proposed residential project. Therefore, this alternative would not result in wasteful, inefficient, or unnecessary consumption of energy resources or conflict with or obstruct a state or local plan for renewable energy or energy efficiency. As a result, these project-specific and cumulative impacts, which were determined to be less than significant under the proposed project, would be similar but reduced under this alternative (less-than-significant impact, reduced).

Geology and Soils

Under the No Project/Community Park alternative, the proposed project would not be implemented. Under this alternative, it is assumed that the project site would be developed with a community park that would include both active and passive forms of recreation; it would also create a linkage for pedestrians and bicyclists from existing urban uses to the west, via extension of the JOST, with the 700-acre Gateway Preserve to the east. All geology and soils impact conclusions of the proposed project would be the same under the No Project/Community Park alternative (see Table 6-2). Consistent with the proposed project, this alternative would have no impact related to earthquake faulting because it is subject to the same risks due to its location on the same project site. The less-than-significant proposed project impacts related to ground shaking, liquefaction, and landslides would also be less than significant under this alternative because of its location on the same project site and its required compliance with existing building safety and construction regulations. Proposed project impacts related to location on an unstable geologic unit or soil, or location on expansive soil, would be less than significant; these impacts would also be less than significant under this alternative because the location would not change. Consistent with the proposed project, this alternative would have no impact related to soil capability for the use of septic tanks or alternative wastewater systems as these components would not be installed. The less-than-significant impact (with mitigation) related to paleontological resources associated with the proposed project would also be less than significant (with mitigation) under this alternative because the footprint associated with potential surface-level ground disturbance would not be larger. Additionally, the less-than-significant cumulative impacts with mitigation related to geology and soils would be the same under No Project/Community Park alternative.

Greenhouse Gas Emissions

Under the No Project/Community Park alternative, the proposed project would not be implemented. Under this alternative, it is assumed that the project site would be developed with a community park that would include both active and passive forms of recreation; it would also create a linkage for pedestrians and bicyclists from existing urban uses to the west, via extension of the JOST, with the 700-acre Gateway Preserve to the east. All GHG impacts of the proposed project would be reduced with the No Project/Community Park alternative (see Table 6-2) in terms of both construction and operation. Construction of this alternative would require fewer activities and less equipment over shorter durations compared to the proposed project, resulting in less GHG emissions. Operations associated with this alternative would generate less GHG emissions related to vehicle trips because there would be no residents and fewer employees. Furthermore, energy use (generation of electricity consumed by the project and natural gas use); solid waste disposal; water supply, treatment, and distribution; and use of refrigerants would either be greatly reduced or eliminated under this alternative. Therefore, the significant and unavoidable impact

relating to the generation of operational GHG emissions in conflict with the SCAQMD threshold would be reduced to a less-than-significant level under this alternative (less-than-significant impact). Mitigation measures prescribed for the proposed project related to solid waste reduction and residential parking would not apply to this alternative and therefore would not be necessary to reduce impacts for the alternative. Furthermore, the significant and unavoidable proposed project impact related to conflict with an applicable plan, policy, or regulation with the purpose of reducing GHG emissions would be less than significant under this alternative (less-than-significant impact). Therefore, the significant and unavoidable cumulative impacts related to GHG emissions would be reduced to a less-than-significant level under the No Project/Community Park alternative (less-than-significant impact).

Hazards and Hazardous Materials

Under the No Project/Community Park alternative, the proposed project would not be implemented. Under this alternative, it is assumed that the project site would be developed with a community park that would include both active and passive forms of recreation; it would also create a linkage for pedestrians and bicyclists from existing urban uses to the west, via extension of the JOST, with the 700-acre Gateway Preserve to the east. Construction of this alternative would require demolition of existing on-site structures, utilities, and related features. As discussed in Section 4.9.1.2, Hazardous Materials, on-site structures may contain hazardous building materials, such as asbestos, lead based paints, and universal wastes, and hazardous materials used for on-site operations, such as paints and petroleum products. If these materials are disturbed during demolition activities without proper abatement, they could result in a significant hazard to the public or environment through routine transport or disposal. Also discussed in Section 4.9.1.1, Previous Environmental Investigations, and Section 4.9.1.2, contaminated soils are present on the project site. These contaminants include organochlorine pesticides and possible undocumented or unknown subsurface contamination due to past commercial and agricultural use of the project site. Movement, transportation, and disposal of contaminated soils without proper characterization and management procedures could result in a significant hazard to the public or environment through routine transport or disposal without appropriate procedures.

Consistent with the proposed project, these issues would pose the same level of impact under the No Project/ Community Park alternative because they are associated with the existing setting of the project site. These impacts could be mitigated to less-than-significant levels with the implementation of the same mitigation measures prescribed for the proposed project, MM-HAZ-1 and MM-HAZ-2, which require pre-demolition hazardous materials abatement and implementation of a soil management plan. Therefore, the No Project/Community Park alternative would have the same less-than-significant impacts (with mitigation) as the proposed project related to the routine transport, use, and disposal and potential release of hazardous materials. Consistent with the proposed project, due to its location at the same project site, this alternative would also have no impact related to hazardous emissions or materials in proximity to existing or proposed schools; being located on a site included on a list of hazardous materials sites compiled pursuant to California Government Code Section 65962.5; or being located near airport operations. The proposed project's less-than-significant impact relating to impairing implementation of or physically interfering with an adopted emergency response plan or emergency evacuation plan would continue to be less than significant, but at a reduced level (less-than-significant impact, reduced). Impacts under the proposed project relating to exposure people or structures to risk involving wildland fires would continue to be less than significant with mitigation, but at a reduced level (less-than-significant impact with mitigation, reduced); impacts associated with wildfire hazards would be addressed by implementing safety requirements before construction, including establishment of temporary access roads, fuel modification zones, and phased site access as required by MM-WF-1, as well as introducing a fire-resistant landscape plan for operation of the project as required by MM-WF-2. Considering the impact discussion above, the less-than-significant cumulative impacts (with mitigation) related to hazards and hazardous materials would continue to be less than significant (with mitigation), but at a reduced level, under the No Project/Community Park alternative (less-than-significant impact with mitigation, reduced).

Hydrology and Water Quality

Under the No Project/Community Park alternative, the proposed project would not be implemented. Under this alternative, it is assumed the project site would be developed with a community park that would include both active and passive forms of recreation.

Consistent with the proposed project, the No Project/Community Park alternative would have less-than-significant project-specific and cumulative impacts on hydrology and water quality because it would not support a new residential population. Therefore, implementation of this alternative would result in the generation of less impervious surface and surface water runoff and a comparatively lesser impact related to compliance with water quality standards and drainage patterns (less-than-significant impact, reduced). Implementation of this alternative also would result in less water demand compared to the proposed project; therefore, it would result in lesser impacts to groundwater recharge (less-than-significant impact, reduced). The alternative would be located at the same project site and would generally use and store similar possible pollutants, so impacts related to pollution due to inundation would remain the same (no impact). The proposed project's less-than-significant impacts relating to conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan would be reduced under this alternative (less-than-significant, reduced). Considering the impact discussion above, the less-than-significant cumulative impacts related to hydrology and water quality would also occur under the No Project/Community Park alternative, but at a reduced level (less-than-significant impact, reduced).

Land Use and Planning

Under the No Project/Community Park alternative, the proposed project would not be implemented. Under this alternative, it is assumed the project site would be developed with a community park that would include both active and passive forms of recreation. This alternative would be consistent with City's General Plan land use and zoning designations of Recreation and thus would have fewer impacts overall because it would not necessitate a General Plan Amendment or zone change.

Consistent with the proposed project, the No Project/Community Park alternative would also have less-than-significant project-specific impacts on land use and planning because it would not physically divide an established community (no impact) or conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect (less-than-significant impact); for the latter, the significant and unavoidable proposed project impact related to conflict with an applicable plan, policy, or regulation with the purpose of avoiding or mitigating environmental effects (GHG emissions) would be less than significant under this alternative. Therefore, the significant and unavoidable cumulative impacts would be reduced to a less-than-significant level under the No Project/Community Park alternative (less-than-significant impact) (see Table 6-2).

Noise

Under the No Project/Community Park alternative, the proposed project would not be implemented. Under this alternative, it is assumed the project site would be developed with a community park that would include both active and passive forms of recreation and it would also create a linkage for pedestrians and bicyclists from existing urban uses to the west, via extension of the JOST, with the 700-acre Gateway Preserve to the east. The impact conclusions for noise under the proposed project would be the same for this alternative, but the impacts overall would be lessened.

Noise impacts would be reduced because this alternative would involve the construction of fewer/smaller structures, thereby resulting in a shorter construction timeline and fewer construction activities and equipment that could generate noise and vibration. This alternative would also result in smaller and fewer structures that would have reduced operational noise sources. Therefore, consistent with the proposed project, this alternative would not generate a substantial temporary or permanent increase in ambient noise or vibration levels in the vicinity of the project (less-than-significant impact, reduced). The alternative would be located at the same site as the proposed project; therefore, consistent with the proposed project, it would have no impact related to the exposure of airport noise. As a result, cumulative impacts, which were determined to be less than significant under the proposed project, would be reduced with this alternative (less-than-significant impact, reduced).

Population and Housing

Under the No Project/Community Park alternative, the proposed project would not be implemented. Under this alternative, it is assumed the project site would be developed with a community park that would include both active and passive forms of recreation. Unlike the proposed project, this alternative would not result in the development of new residential units or associated residential population. Consistent with the proposed project, the No Project/ Community Park alternative would have less-than-significant project-specific and cumulative impacts, or no impacts, on population and housing because it would not be growth inducing (it would serve the existing City of Irvine residents in an almost entirely built-out city; less-than-significant impact) or displace existing people or housing (no impact; see Table 6-2).

Public Services

Under the No Project/Community Park alternative, the proposed project would not be implemented. Under this alternative, it is assumed the project site would be developed with a community park that would include both active and passive forms of recreation.

Consistent with the proposed project, the No Project/Community Park alternative would also have less-than-significant project-specific and cumulative impacts on public services because it would not generate as much demand for the City's police department, fire department, schools, or other public facilities (less-than-significant impact, reduced) (see Table 6-2).

Recreation

Under the No Project/Community Park alternative, the proposed project would not be implemented. Under this alternative, it is assumed that the project site would be developed with a community park that would include both active and passive forms of recreation and it would also create a linkage for pedestrians and bicyclists from existing urban uses to the west, via extension of the JOST, with the 700-acre Gateway Preserve to the east. The less-than-significant proposed project impact related to the increase in use of existing neighborhood and regional parks or other recreational facilities would not occur under this alternative (no impact). Development under this alternative would result in new active and passive recreation opportunities within the City that could alleviate City-wide recreation demands and therefore reduce the use and deterioration of existing parks and recreational facilities, thereby extending the lifespans of those facilities.

The significant and unavoidable impact relating to the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment, would also occur under this alternative. Additionally, the significant and unavoidable cumulative impacts related to recreation would also occur with the No Project/Community Park alternative.

Transportation

Under the No Project/Community Park alternative, the proposed project would not be implemented. Under this alternative, it is assumed that the project site would be developed with a community park that would include both active and passive forms of recreation. Consistent with the proposed project, this alternative would also create a linkage for pedestrians and bicyclists from existing urban uses to the west, via extension of the JOST, with the 700-acre Gateway Preserve to the east. This alternative would generate fewer vehicle trips; according to San Diego Association of Governments guidance on vehicular traffic generation rates, community park uses generate fewer trips than the proposed project's residential use (SANDAG 2002). All transportation impacts of the proposed project would be the same or reduced under the No Project/Community Park alternative (see Table 6-2).

The less-than-significant impact related to potential conflict with transportation programs, ordinances, or policies would be the same under this alternative because it does not propose any components that are different from the proposed project and that would pose a potential conflict. The proposed project would maintain the existing walkways/sidewalks, on-street (Class II) bicycle lanes, and JOST in the vicinity of the project site, as well as enhancing pedestrian connectivity with new facilities. Consistent with the City's circulation policies, this alternative would provide safe, convenient, and direct pedestrian access to surrounding land uses; plan and enhance a comprehensive bicycle network that encourages increased use of bicycles; and provide multi-use trails. Therefore, the No Project/Community Park alternative would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities (less-than-significant impact).

The No Project/Community Park alternative does not meet the screening criteria identified in the City's Traffic Study Guidelines. However, because the alternative involves the development of a community park, the VMT impact analyzed below includes a qualitative analysis that describes the alternative's impact on VMT within the surrounding community. This approach is consistent with CEQA Guidelines Section 15064.3(b)(1), Criteria for Analyzing Transportation Impacts, and Section 15064.3(b)(3), Qualitative Analysis, which mention that if existing models or methods are not available to estimate the VMT for the particular project being considered, a lead agency may analyze the project's vehicle miles qualitatively. Such qualitative analysis would evaluate factors such as the availability of transit, proximity to other destinations, etc.

This alternative would consist of a community park that would primarily serve the immediate community of north Irvine, as well as other neighborhoods within the City. The alternative would include new active and passive recreation facilities. The City has other parks with similar recreational opportunities. However, the location of the project site would reduce the need for park users in north Irvine to travel to other parks within the City; therefore, it would reduce vehicle trip length. The No Development/Community Park alternative would draw local traffic and would be used primarily by local residents. Therefore, based on the alternative's proposed uses, its location in an area where similar uses are not provided, and the alternative's potential to divert traffic from parks much farther away, the alternative is anticipated to have a less-than-significant impact on VMT. As detailed in Section 6.3.2.5, Transportation, the proposed project would have a significant and unavoidable impact related to conflicts or inconsistencies with CEQA Guidelines Section 15064.3(b) due to increased VMT, even after mitigation. Therefore, implementation of the No Project/Community Park alternative would result in a reduced impact to VMT (less than significant).

Consistent with the proposed project, the less-than-significant impacts (with mitigation) related to increase in transportation hazards due to a geometric design feature or incompatible uses would be reduced to less than significant under this alternative (less-than-significant impact). Less-than-significant impacts relating to inadequate emergency access were identified for the proposed project, given its proposed and existing

surrounding circulation network. It is assumed that this alternative would implement an internal circulation network with less potential for inadequate emergency access compared to the proposed project because it would generate less VMT (less-than-significant impact, reduced). Considering the impact discussion above, the significant and unavoidable cumulative transportation impacts under the proposed project would be reduced under the No Project/Community Park alternative (less-than-significant impact). Therefore, proposed project mitigation measures are not required to address VMT impacts for the No Project/Community Park alternative.

Tribal Cultural Resources

Under the No Project/Community Park alternative, the proposed project would not be implemented. The existing conditions described in Section 4.17, Tribal Cultural Resources, would be generally maintained because the proposed project development would not be implemented. Under this alternative, it is assumed that the project site would be developed with a community park that would include both active and passive forms of recreation; it would also create a linkage for pedestrians and bicyclists from existing urban uses to the west, via extension of the JOST, with the 700-acre Gateway Preserve to the east. All tribal cultural resource impact conclusions of the proposed project would be the same under the No Project/Community Park alternative (see Table 6-2); this is explained because the amount of surface-level ground disturbance—which is the primary activity that could affect tribal cultural resources—required for this alternative is unknown at this time. For the purposes of this analysis, it is assumed that footprint of surface-level ground disturbance associated with the No Project/ Community Park alternative could be as extensive as, but not exceed, that of the proposed project. The less-than-significant impact related to tribal cultural resources listed or eligible for listing pursuant to Public Resources Code Section 5020.1(k) would be the same. The less-than-significant impact (with mitigation) related to tribal cultural resources determined by the lead agency, considering the significance to a California Native American tribe, would also be the same. Additionally, the less-than-significant cumulative impacts (with mitigation) related to tribal cultural resources would be the same under the No Project/Community Park alternative.

Utilities and Service Systems

Under the No Project/Community Park alternative, the proposed project would not be implemented. Under this alternative, it is assumed the project site would be developed with a community park that would include both active and passive forms of recreation.

Consistent with the proposed project, the No Project/Community Park alternative would also have less-than-significant project-specific and cumulative impacts on utilities and service systems because it would not support a new residential population and associated demands on utilities and service systems. Although this alternative may require the relocation or construction of new or expanded water or wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects, the demand would be far less (less-than-significant impact). Compared to the proposed project, this alternative would not generate as much demand for water, wastewater treatment, electricity, natural gas, and solid waste management (less-than-significant impacts, reduced) (see Table 6-2) because it would not result in a new permanent resident population drawing on these services for the long term.

Wildfire

Under the No Project/Community Park alternative, the proposed project would not be implemented. Under this alternative, it is assumed that the project site would be developed with a community park that would include both active and passive forms of recreation. No residential units would be developed. All wildfire impacts of the proposed

project would be reduced under the No Project/Community Park alternative (see Table 6-2) because development under this alternative would not result in a new residential population. It is also assumed that construction of this alternative would involve a shorter construction timeline, with fewer construction activities and equipment, compared to the proposed project. Therefore, the No Project/Community Park alternative would result in reduced wildfire risks in terms of both construction and operation.

For these reasons, the proposed project's less-than-significant impacts related to substantial impairment of an adopted emergency response plan or emergency evacuation plan would continue to be less than significant, but at a reduced level (less-than-significant impacts, reduced). The less-than-significant impacts (with mitigation) from the proposed project related to the spread of wildfire and installation or maintenance of infrastructure that may exacerbate fire risk would also be less than significant (with mitigation) under this alternative, but the impact would be reduced (less-than-significant impact with mitigation, reduced). Mitigation measures prescribed for the proposed project to address these impacts would apply to this alternative. These include implementing pre-construction measures to reduce fire risks during construction and a fire-resistant landscape plan. The less-than-significant proposed project impact related to the exposure of people or structures to significant risks as a result of runoff, post-fire slope instability, or drainage changes would also occur, but at a reduced level, under this alternative (less-than-significant impact, reduced). This impact would be reduced under this alternative because development would result in no residential occupants but would support park users during the daytime and because the alternative would have fewer structures than the proposed project. Additionally, pursuant to the discussion above, the less-than-significant cumulative impacts (with mitigation) related to wildfire under the proposed project would also be less than significant (with mitigation) under the No Project/Community Park alternative, but at a reduced level (less-than-significant impact with mitigation, reduced).

6.5.2.3 Ability to Meet Project Objectives

The No Project/Community Park alternative would not result in the development of residential units. As described in Section 6.5.2.1, under this alternative, the project would be developed with a community park that would include both active and passive forms of recreation and associated facilities; it would also create a linkage for pedestrians and bicyclists from existing urban uses to the west, via extension of the JOST, with the 700-acre Gateway Preserve to the east.

The No Project/Community Park alternative would not meet any of the proposed project objectives related to the provision of residential units (see Table 6-1). In particular, this alternative would not provide housing stock or affordable housing to advance compliance with the City's RHNA Goals (Objective 1, Objective 2, and Objective 3).

Although implementation of this alternative could generate some direct revenue for the City, in the form of charging fees for active park uses, the proposed project would generate substantially more funds through the sale of new residential units and additional expenditure by those new residents throughout the City. Therefore, the No Project/Community Park alternative would generate relatively less revenue to be made available for the City's General Fund, partially meeting Objective 4 (see Table 6-1).

The No Project/Community Park alternative would create gathering spaces and encourage outdoor vehicle-free movement by providing passive and active recreational facilities, including green spaces and outdoor amenity areas. These amenities would be within walking distance of nearby neighborhoods. The alternative would not create a residential community with private amenities that are architecturally themed. Therefore, the No Project/Community Park alternative would partially meet Objective 5 (see Table 6-1).

Consistent with the proposed project, implementation of the No Project/Community Park alternative would complete the comprehensive circulation network with integrated mobility options by connecting pedestrians and bicyclists traveling to a non-vehicular bridge across Portola Parkway to the broader Irvine community to the south and west of Gateway Village. The alternative would establish connectivity between land uses through the extension of the JOST to its connection point with the 700-acre Gateway Preserve via the South Park trailhead, which sustains the City's goals to enhance quality living environments through parks and open space. Therefore, the No Project/ Community Park alternative would meet Objective 6 (see Table 6-1).

6.5.3 Alternative 3: Reduced Residential

6.5.3.1 Description

The Reduced Residential alternative includes development at a reduced residential density, overall residential buildout footprint, and layout compared to the proposed project.. This alternative would include the development of approximately 645 market-rate units and 216 affordable units, for a total of 861 units. The architectural design and themes of this alternative, and associated building materials, are assumed to be consistent with the proposed project. This alternative represents a 30% reduction in residential units, associated residents, and overall residential buildout footprint. The alternative would have the same non-housing components, including the extension of the JOST as well as the new parks and paseos, with additional open space in place of the higher residential unit count in the proposed project. Under this alternative, it is assumed that the additional open space available would be sited in the northern portion of the project site, thereby avoiding Hicks Canyon Wash and providing a natural buffer from the existing riparian (drainage) area and habitat. The proposed circulation system would be consistent with the project's proposed roadways and bikeways. Construction activities—including durations, phasing, and equipment—required for this alternative are assumed to be less extensive than for the proposed project. General operations and maintenance activities related to residential uses under this alternative are anticipated to be similar to those of the proposed project, but reduced by 30%.

As noted above, the underlying purpose of the proposed project is to provide housing stock and improve the City's circulation network. Under this Reduced Residential alternative, all existing conditions are generally based on those existing in 2024, when the NOP was released; at this time, the project site consisted primarily of active agricultural fields with equipment storage and laydown areas in the northern portion of the site. Because this alternative involves a reduced number of residential units, revenue associated with future home sales would be less compared to the proposed project (see Section 6.5.3.3).

6.5.3.2 Impact Analysis

Aesthetics

Under the Reduced Residential alternative, the proposed project would be implemented with a 30% reduction in residential units. Under this alternative, it is assumed that the project site would be developed with a reduced overall residential buildout footprint compared to the proposed project. The alternative would have the same non-housing components, including the extension of the JOST as well as the new parks and paseos, with additional open space in place of the higher residential unit count in the proposed project. General operations and maintenance activities related to residential uses under this alternative are anticipated to be similar to those of the proposed project, but reduced by 30%.

Consistent with the proposed project, the Reduced Residential alternative would also have less-than-significant project-specific and cumulative impacts on aesthetics. Because the alternative would be developed with fewer structures of similar architectural design and themes, covering a smaller overall buildout footprint, aesthetic impacts would continue to be less than significant but would be reduced compared to the proposed project (less-than-significant impact, reduced) (see Table 6-2). Similar to the proposed project, the Reduced Residential alternative would not impact scenic resources (no impact). With regard to conflicts with applicable zoning and other regulations governing scenic quality, impacts under this alternative would also be less than significant. Because the alternative would involve the same use and a relatively smaller buildout footprint and massing, this impact would be reduced compared to the proposed project (less-than-significant impact, reduced). Both the proposed project and the Reduced Residential alternative would utilize similar lighting fixtures. However, because this alternative occupies a smaller residential buildout footprint, it would require less outdoor lighting; therefore, lighting impacts would continue to be less than significant but would be reduced compared to the proposed project (less-than-significant impact, reduced). Considering the impacts discussed above, the less-than-significant cumulative impacts related to aesthetics would also occur with the Reduced Residential alternative but would be comparatively reduced (less-than-significant impact, reduced).

Agriculture and Forestry Resources

Under the Reduced Residential alternative, the proposed project would be implemented with a 30% reduction in residential units. Under this alternative, it is assumed that the project site would be developed with a reduced overall residential buildout footprint compared to the proposed project. The alternative would have the same non-housing components, including the extension of the JOST as well as the new parks and paseos, with additional open space in place of the higher residential unit count in the proposed project. General operations and maintenance activities related to residential uses under this alternative are anticipated to be similar to those of the proposed project, but reduced by 30%.

This alternative would require the conversion of agricultural land for the development of a residential village. Therefore, the proposed project conditions, including the conversion of agricultural lands, would be similar to those described in Section 4.2, Agriculture and Forestry Resources. Under the Reduced Residential alternative, it is assumed that the conversion of 67.46 acres from agricultural (Important Farmland) to non-agricultural uses would occur (significant and unavoidable impact) (see Table 6-2). The less-than-significant impact identified for the proposed project related to other changes in the existing environment that could result in the conversion of farmland would also be less than significant under this alternative because it proposes operations similar to the proposed project. Consistent with the proposed project, this alternative would also have no impact on forest lands and forestry resources because it is located at the same site. Considering the impacts discussed above, the significant and unavoidable cumulative impacts related to agricultural resources would also occur with the Reduced Residential alternative due to the loss in Important Farmland.

Air Quality

Under the Reduced Residential alternative, the proposed project would be implemented with a 30% reduction in residential units. Under this alternative, it is assumed that the project site would be developed with a reduced overall residential buildout footprint compared to the proposed project. The alternative would have the same non-housing components, including the extension of the JOST as well as the new parks and paseos, with additional open space in place of the higher residential unit count in the proposed project. General operations and maintenance activities related to residential uses under this alternative are anticipated to be similar to those of the proposed project, but reduced by 30%.

The significant and unavoidable proposed project impact related to the cumulatively considerable increase in criteria air pollutants—specifically, operational emissions—would be reduced but would still be significant and unavoidable under this alternative (significant and unavoidable, but reduced). The proposed project would result in a significant and unavoidable operational impact due to its anticipated levels of VOCs, which are associated primarily with the application/reapplication of architectural coatings. Because this alternative would involve a residential development of a similar magnitude to that of the proposed project, even though reduced, it would also result in a significant and unavoidable impact associated with the use of VOCs. Although the alternative would result in 30% fewer occupants and overall building footprint, the use of VOCs via the application/reapplication of architectural coatings is anticipated to be of a similar magnitude compared to the proposed project. Regarding construction impacts, compared to the proposed project, construction activities would be less extensive. Therefore, construction air quality impacts would also be less than significant with mitigation under this alternative, but would be reduced (less-than-significant impact with mitigation, reduced).

The less-than-significant impact (with mitigation) identified for the proposed project related to the exposure of sensitive receptors to pollutant concentrations would occur at a reduced level under the Reduced Residential alternative because it is expected to involve a shorter construction timeline and less extensive construction activities (less-than-significant impact with mitigation, reduced). The less-than-significant impact identified for the proposed project related to other emissions would also be the same under this alternative because it would generate the same types of emissions because of similarities in both construction and operations. Additionally, considering the impacts described herein, the significant and unavoidable cumulative impacts related to air quality would be the same under the Reduced Residential alternative, but comparatively reduced (significant and unavoidable, reduced).

Biological Resources

Under the Reduced Residential alternative, the proposed project would be implemented with a 30% reduction in residential units. Under this alternative, it is assumed that the project site would be developed with a reduced overall residential buildout footprint compared to the proposed project. The alternative would have the same non-housing components, including the extension of the JOST as well as the new parks and paseos, with additional open space in place of the higher residential unit count in the proposed project. General operations and maintenance activities related to residential uses under this alternative are anticipated to be similar to those of the proposed project, but reduced by 30%.

All biological resource impact conclusions of the proposed project would either be the same, or reduced, under the Reduced Residential alternative (see Table 6-2); the amount of surface-level ground disturbance—which is the primary activity that could affect biological resources—required for this alternative is assumed to be reduced compared to the proposed project. Consistent with the proposed project, this alternative would continue to have no impact on native wildlife nursery sites or conflict with the provisions of an adopted Habitat Conservation Plan or Natural Community Conservation Plan (no impact). The less-than-significant riparian habitat impact associated with the proposed project would be reduced under this alternative because additional open space would be sited where the existing riparian (drainage) area is located, in the northern portion of the project site (less-than-significant impact, reduced) and filling in Hicks Canyon Wash for the development of South Park and “C” Street could be avoided. Further, the less-than-significant impacts (with mitigation) related to special-status species, state or federally protected wetlands, and conflict with local policies protecting biological resources associated with the proposed project would be reduced under this alternative because it involves less ground disturbance and would be sited farther away from an existing riparian (drainage) area (less-than-significant impact with mitigation, reduced). The same mitigation measures (MM-BIO-1 through MM-BIO-9) applied to the proposed project would be

required to address these impacts under this alternative. Additionally, the less-than-significant cumulative impacts (with mitigation) related to biological resources would be reduced under the No Project/Community Park alternative (less-than-significant impact with mitigation, reduced).

Cultural Resources

Under the Reduced Residential alternative, the proposed project would be implemented with a 30% reduction in residential units. Under this alternative, it is assumed that the project site would be developed with a reduced overall residential buildout footprint compared to the proposed project. The alternative would have the same non-housing components, including the extension of the JOST as well as the new parks and paseos, with additional open space in place of the higher residential unit count in the proposed project. General operations and maintenance activities related to residential uses under this alternative are anticipated to be similar to those of the proposed project, but reduced by 30%.

All cultural resource impact conclusions of the proposed project would be the same, or reduced, under the Reduced Residential alternative (see Table 6-2) because the amount of surface-level ground disturbance—which is the primary activity that could affect archaeological resources—required for this alternative is assumed to be reduced compared to the proposed project. Consistent with the proposed project, this alternative would also have no impact to historical resources. Furthermore, the less-than-significant impacts (with mitigation) related to archaeological resources and human remains associated with the proposed project would be reduced under this alternative because it has the potential to involve less surface-level ground disturbance (less-than-significant impact with mitigation, reduced). The same mitigation measures (MM-CUL-1 through MM-CUL-3—sensitivity training, resource monitoring, and inadvertent discovery protocols) applied to the proposed project would be required to address these impacts under this alternative. Additionally, considering this impact discussion, the less-than-significant cumulative impacts (with mitigation) related to cultural resources would be reduced under the Reduced Residential alternative (less-than-significant impact with mitigation, reduced).

Energy

Under the Reduced Residential alternative, the proposed project would be implemented with a 30% reduction in residential units. Under this alternative, it is assumed that the project site would be developed with a reduced overall residential buildout footprint compared to the proposed project. General operations and maintenance activities related to residential uses under this alternative are anticipated to be similar to those of the proposed project, but reduced by 30%.

Because this alternative includes fewer residents occupying the project site, there would be less demand for natural resources once operational. Therefore, impacts of the Reduced Residential alternative related to energy would be reduced compared to the proposed project, and this alternative would not result in wasteful, inefficient, or unnecessary consumption of energy resources or conflict with or obstruct a state or local plan for renewable energy or energy efficiency. As a result, these project-specific and cumulative energy impacts, which were determined to be less than significant under the proposed project, would be reduced with this alternative (less-than-significant impact, reduced) (see Table 6-2).

Geology and Soils

Under the Reduced Residential alternative, the proposed project would be implemented with a 30% reduction in residential units. Under this alternative, it is assumed that the project site would be developed with a reduced

overall residential buildout footprint compared to the proposed project. The alternative would have the same non-housing components, including the extension of the JOST as well as the new parks and paseos, with additional open space in place of the higher residential unit count in the proposed project.

All geology and soils impact conclusions of the proposed project would be the same under the Reduced Residential alternative (see Table 6-2). Consistent with the proposed project, this alternative would also have no impact related to earthquake faulting because it is subject to the same risks due to its location on the same project site. The less-than-significant impact (with mitigation) related to paleontological resources associated with the proposed project would be the same under this alternative because the footprint associated with potential surface-level ground disturbance would not be larger. The less-than-significant proposed project impacts related to ground shaking, liquefaction, and landslides would also be less than significant under this alternative because of its location on the same project site and its required compliance with existing building safety and construction regulations. Consistent with the proposed project, this alternative would also have no impact related to soil capability for the use of septic tanks or alternative wastewater systems, because these components would not be installed. Additionally, considering the discussion above, the less-than-significant cumulative impacts (with mitigation) related to geology and soils would be the same under the Reduced Residential alternative.

Greenhouse Gas Emissions

Under the Reduced Residential alternative, the proposed project would be implemented with a 30% reduction in residential units. Under this alternative, it is assumed that the project site would be developed with a reduced overall residential buildout footprint compared to the proposed project. The alternative would have the same non-housing components, including the extension of the JOST as well as the new parks and paseos, with additional open space in place of the higher residential unit count in the proposed project. General operations and maintenance activities related to residential uses under this alternative are anticipated to be similar to those of the proposed project, but reduced by 30%.

All GHG impacts of the proposed project would be the same or less under the Reduced Residential alternative (see Table 6-2) in terms of both construction and operation. Construction of this alternative is assumed to be less expensive than under the proposed project, therefore resulting in reduced GHG emissions. While it is anticipated that operations associated with this alternative would generate less GHG emissions related to vehicle trips because there would be fewer residents, this reduction is not anticipated to reduce GHG emissions to a level below the SCAQMD significance threshold of 3,000 MT CO_2e (significant and unavoidable impact, reduced). Furthermore, energy use (generation of electricity consumed by the project and natural gas use); solid waste disposal; water supply, treatment, and distribution; and use of refrigerants would be greatly reduced under this alternative, but not to a level below the SCAQMD threshold (significant and unavoidable impact, reduced). Furthermore, the significant and unavoidable proposed project impact related to conflict with an applicable plan, policy, or regulation with the purpose of reducing GHG emissions would also be significant and unavoidable, although it would be lessened (significant and unavoidable impact, reduced). Considering the impacts described herein, the significant and unavoidable cumulative impacts related to GHG emissions would be significant and unavoidable, but lessened, under the Reduced Residential alternative (significant and unavoidable impact, reduced).

Hazards and Hazardous Materials

Under the Reduced Residential alternative, the proposed project would be implemented with a 30% reduction in residential units. Under this alternative, it is assumed that the project site would be developed with a reduced overall residential buildout footprint compared to the proposed project. The alternative would have the same non-

housing components, including the extension of the JOST as well as the new parks and paseos, with additional open space in place of the higher residential unit count in the proposed project. General operations and maintenance activities related to residential uses under this alternative are anticipated to be similar to those of the proposed project, but reduced by 30%.

Construction of this alternative would require the same demolition of existing on-site structures, utilities, and related features as the proposed project. As discussed in Section 4.9, Hazards and Hazardous Materials, proposed project construction activities, including demolition, could result in a significant hazard to the public or environment through routine transport or disposal of hazardous materials. Consistent with the proposed project, these issues would pose the same level of impact under the Reduced Residential alternative because they are associated with the existing setting of the project site. These impacts could be mitigated to less-than-significant levels with the implementation of the same mitigation measures prescribed for the proposed project, which require pre-demolition hazardous materials abatement and implementation of a soil management plan. Therefore, the Reduced Residential alternative would have the same less-than-significant (with mitigation) impacts as the proposed project related to the routine transport, use, and disposal and potential release of hazardous materials. Consistent with the proposed project, due to its location at the same project site, this alternative would also have no impact related to hazardous emissions or materials in proximity to existing or proposed schools; being located on a site included on a list of hazardous materials sites compiled pursuant to California Government Code Section 65962.5; or being located near airport operations. The proposed project's less-than-significant impact relating to impairing implementation of or physically interfering with an adopted emergency response plan or emergency evacuation plan would continue to be less than significant (less-than-significant impact; reduced). Impacts under the proposed project relating to exposure people or structures to risk involving wildland fires would continue to be less than significant with mitigation, but at a reduced level because relatively fewer residents would inhabit the project site (less-than-significant impact, reduced); impacts associated with wildfire hazards would be addressed by implementing safety requirements before construction, including establishment of temporary access roads, fuel modification zones, and phased site access as required by MM-WF-1, as well as introducing a fire-resistant landscape plan for operation of the project as required by MM-WF-2. Considering the impact discussion above, the less-than-significant cumulative impacts (with mitigation) related to hazards and hazardous materials under the proposed project would continue to be less than significant with mitigation, but at a reduced level, under the Reduced Residential alternative (less-than-significant impact, reduced).

Hydrology and Water Quality

Under the Reduced Residential alternative, the proposed project would be implemented with a 30% reduction in residential units. Under this alternative, it is assumed that the project site would be developed with a reduced overall residential buildout footprint compared to the proposed project. The alternative would have the same non-housing components, including the extension of the JOST as well as the new parks and paseos, with additional open space in place of the higher residential unit count in the proposed project. General operations and maintenance activities related to residential uses under this alternative are anticipated to be similar to those of the proposed project, but reduced by 30%.

Because this alternative would include fewer residents occupying the project site, there would be less demand for natural resources, such as potable water. Compared to the proposed project, this alternative would result in the generation of a reduced amount of impervious surfaces and surface water runoff; therefore, its impact related to compliance to water quality standards and drainage patterns would continue to be less than significant but would be reduced (less-than-significant impact, reduced). Implementation of this alternative would result in less water demand compared to the proposed project; therefore, it would result in reduced impacts to groundwater recharge (less-than-

significant impact, reduced). The alternative would be located at the same project site and would generally use and store similar residential pollutants, so impacts related to inundation would remain the same (no impact). Considering the impact discussion above, the less-than-significant cumulative impacts related to hydrology and water quality would remain, at a reduced level, under the Reduced Residential alternative (less-than-significant impact, reduced).

Land Use and Planning

Under the Reduced Residential alternative, the proposed project would be implemented with a 30% reduction in residential units. Under this alternative, it is assumed that the project site would be developed with a reduced overall residential buildout footprint compared to the proposed project. The alternative would have the same non-housing components, including the extension of the JOST as well as the new parks and paseos, with additional open space in place of the higher residential unit count in the proposed project. General operations and maintenance activities related to residential uses under this alternative are anticipated to be similar to those of the proposed project, but reduced by 30%.

The alternative proposes the same land use as the proposed project and would therefore have the same land use and planning impacts. Consistent with the proposed project, the Reduced Residential alternative would not physically divide an established community (no impact). However, the significant and unavoidable proposed project impact related to conflict with an applicable plan, policy, or regulation with the purpose of reducing environmental effects (GHG emissions) would also be significant and unavoidable, although it would be lessened (significant and unavoidable impact, reduced). Considering the impacts described herein, the significant and unavoidable cumulative impacts related to land use and planning would be significant and unavoidable, but lessened, under the Reduced Residential alternative (significant and unavoidable impact, reduced).

Noise

Under the Reduced Residential alternative, the proposed project would be implemented with a 30% reduction in residential units. Under this alternative, it is assumed that the project site would be developed with a reduced overall residential buildout footprint compared to the proposed project. The alternative would have the same non-housing components, including the extension of the JOST as well as the new parks and paseos, with additional open space in place of the higher residential unit count in the proposed project. General operations and maintenance activities related to residential uses under this alternative are anticipated to be similar to those of the proposed project, but reduced by 30%.

The alternative would have reduced noise impacts because it would support fewer residents, thereby generating relatively less operational noise (less-than-significant impact, reduced). Construction noise and vibration levels would be slightly reduced under this alternative because of less extensive construction (less-than-significant impact, reduced). As a result, the project-specific and cumulative impacts that were determined to be less than significant or to not occur under the proposed project would be the same or reduced with this alternative (less-than-significant impact, reduced).

Population and Housing

Under the Reduced Residential alternative, the proposed project would be implemented with a 30% reduction in residential units. Under this alternative, it is assumed that the project site would be developed with a reduced overall residential buildout footprint compared to the proposed project. The alternative would have the same non-housing components, including the extension of the JOST as well as the new parks and paseos, with additional open space in

place of the higher residential unit count in the proposed project. General operations and maintenance activities related to residential uses under this alternative are anticipated to be similar to those of the proposed project, but reduced by 30%.

This alternative would not result in the displacement of people or housing because the project site currently does not contain housing. Considering the analysis in Section 4.13, Population and Housing, the proposed project's potential population, housing, and employment growth is not considered substantial. Therefore, because this alternative represents a 30% reduction in residential units, growth-inducing impacts would also be less than significant but would be reduced compared to the proposed project (less-than-significant impact, reduced). Consistent with the proposed project, the Reduced Residential alternative would have less-than-significant project-specific and cumulative impacts to population and housing because it would not be growth inducing or displace existing people or housing (see Table 6-2).

Public Services

Under the Reduced Residential alternative, the proposed project would be implemented with a 30% reduction in residential units. Under this alternative, it is assumed that the project site would be developed with a reduced overall residential buildout footprint compared to the proposed project. The alternative would have the same non-housing components, including the extension of the JOST as well as the new parks and paseos, with additional open space in place of the higher residential unit count in the proposed project. General operations and maintenance activities related to residential uses under this alternative are anticipated to be similar to those of the proposed project, but reduced by 30%.

Because this alternative would include fewer residents occupying the project site, there would be reduced demand for public services. The alternative would not generate as much demand for the City's police department, fire department, schools, or other public facilities (less-than-significant impact, reduced). The less-than-significant cumulative impacts related to public services would also occur, at a reduced level, under the Reduced Residential alternative (less-than-significant impact, reduced).

Recreation

Under the Reduced Residential alternative, the proposed project would be implemented with a 30% reduction in residential units. Under this alternative, it is assumed that the project site would be developed with a reduced overall residential buildout footprint compared to the proposed project. The alternative would have the same non-housing components, including the extension of the JOST as well as the new parks and paseos, with additional open space in place of the higher residential unit count in the proposed project. General operations and maintenance activities related to residential uses under this alternative are anticipated to be similar to those of the proposed project, but reduced by 30%.

The less-than-significant proposed project impact related to the increase in use of existing neighborhood and regional parks or other recreational facilities would also be less than significant under this alternative. Consistent with the proposed project impact conclusion, it is expected that the population would use existing neighborhood parks, regional parks, and other recreational facilities in the City. However, the incremental impact of this additional population on the use of existing recreational facilities would not result in substantial physical deterioration of these facilities or acceleration thereof, even if the population exclusively used the existing facilities. This impact would also be less than significant but would be reduced compared to the proposed project due to the 30% reduction in new residents and associated lesser demand on existing parks and recreational facilities (less-than-significant impact, reduced).

The significant and unavoidable impact relating to the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment, would also occur under this alternative. Additionally, the significant and unavoidable cumulative impacts related to recreation would also occur with the Reduced Residential alternative, but at a lessened level (significant and unavoidable impact, reduced).

Transportation

Under the Reduced Residential alternative, the proposed project would be implemented with a 30% reduction in residential units. Under this alternative, it is assumed that the project site would be developed with a reduced overall residential buildout footprint compared to the proposed project. The alternative would have the same non-housing components, including the extension of the JOST as well as the new parks and paseos, with additional open space in place of the higher residential unit count in the proposed project. General operations and maintenance activities related to residential uses under this alternative are anticipated to be similar to those of the proposed project, but reduced by 30%. The alternative would also have a similar circulation network for vehicles, bicyclists, and pedestrians. All transportation impacts of the proposed project would be equal or reduced under the Reduced Residential alternative (see Table 6-2).

The less-than-significant impact related to potential conflict with transportation programs, ordinances, or policies under the proposed project would also occur under this alternative because it does not propose any components that are different from the proposed project and that would pose a potential conflict. The proposed project would maintain the existing walkways/sidewalks, on-street (Class II) bicycle lanes, and JOST in the vicinity of the project site, as well as enhancing pedestrian connectivity with new facilities. Consistent with the City's circulation policies, this alternative would also provide safe, convenient, and direct pedestrian access to surrounding land uses; would plan and enhance a comprehensive bicycle network that encourages increased use of bicycles; and would provide multi-use trails. Therefore, this alternative would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, and impacts would be the same as those under the proposed project (less-than-significant impact).

Even with implementation of mitigation measures prescribed for the proposed project, the Reduced Residential alternative would have a similarly significant and unavoidable impact related to conflicts or inconsistencies with CEQA Guidelines Section 15064.3(b) due to VMT. Although the alternative would generate less VMT because of the reduction in residents, the impact would still be significant because the City's VMT threshold is based on VMT per capita; therefore, although there would be less VMT, the rate of VMT generated (VMT per capita) is not anticipated to be significantly reduced compared to the proposed project (significant and unavoidable impact, reduced).

Consistent with the proposed project, the less-than-significant impacts (with mitigation) related to an increase in transportation hazards due to a geometric design feature or incompatible uses would be less than significant (with mitigation) under this alternative (less-than-significant impact with mitigation). Consistent with the proposed project, this alternative would also implement MM-TRA-4 (Traffic Signal Installation), requiring the project to install a new traffic signal on Jeffrey Road. Less-than-significant impacts relating to inadequate emergency access were identified for the proposed project, given its proposed and existing surrounding circulation network. This alternative would implement the same internal circulation network, with the same potential for inadequate emergency access as the proposed project (less-than-significant impact). Considering the impact discussion above, the cumulative transportation impacts under this alternative would be the same as those under the proposed project (significant and unavoidable impact).

Tribal Cultural Resources

Under the Reduced Residential alternative, the proposed project would be implemented with a 30% reduction in residential units. Under this alternative, it is assumed that the project site would be developed with a reduced overall residential buildout footprint compared to the proposed project. The alternative would have the same non-housing components, including the extension of the JOST as well as the new parks and paseos, with additional open space in place of the higher residential unit count in the proposed project. General operations and maintenance activities related to residential uses under this alternative are anticipated to be similar to those of the proposed project, but reduced by 30%.

All tribal cultural resource impact conclusions of the proposed project would be the same, or reduced, under the Reduced Residential alternative (see Table 6-2) because the amount of surface-level ground disturbance—which is the primary activity that could affect tribal cultural resources—required for this alternative is assumed to be reduced compared to the proposed project. Consistent with the proposed project, the less-than-significant impact related to tribal cultural resources listed or eligible for listing pursuant to Public Resources Code Section 5020.1(k) would be the same. The less-than-significant impact (with mitigation) related to tribal cultural resources determined by the lead agency, considering the significance to a California Native American tribe, would be reduced (less than significant with mitigation, reduced). Additionally, the less-than-significant cumulative impacts (with mitigation) related to tribal cultural resources would be reduced under the Reduced Residential alternative (less than significant with mitigation, reduced).

Utilities and Service Systems

Under the Reduced Residential alternative, the proposed project would be implemented with a 30% reduction in residential units. Under this alternative, it is assumed that the project site would be developed with a reduced overall residential buildout footprint compared to the proposed project. The alternative would have the same non-housing components, including the extension of the JOST as well as the new parks and paseos, with additional open space in place of the higher residential unit count in the proposed project. General operations and maintenance activities related to residential uses under this alternative are anticipated to be similar to those of the proposed project, but reduced by 30%.

Compared with the proposed project, the Reduced Residential alternative would have less-than-significant project-specific and cumulative impacts on utilities and service systems, but lessened, because it would support a reduced number of residents and associated demands on utilities and service systems (less-than-significant impact, reduced). Consistent with the proposed project, this alternative would not require or result in the relocation or construction of new or expanded water or wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects (less-than-significant impact). Compared to the proposed project, this alternative would not generate as much demand for water, wastewater treatment, electricity, natural gas, and solid waste management (less-than-significant impact, reduced) (see Table 6-2).

Wildfire

Under the Reduced Residential alternative, the proposed project would be implemented with a 30% reduction in residential units. Under this alternative, it is assumed that the project site would be developed with a reduced overall residential buildout footprint compared to the proposed project. The alternative would have the same non-housing components, including the extension of the JOST as well as the new parks and paseos, with additional

open space in place of the higher residential unit count in the proposed project. General operations and maintenance activities related to residential uses under this alternative are anticipated to be similar to those of the proposed project, but reduced by 30%. The alternative would have a similar circulation network for vehicles, bicyclists, and pedestrians.

All wildfire impacts of the proposed project would be equal or slightly reduced under the Reduced Residential alternative (see Table 6-2) because development under this alternative would also entail new residents occupying the site.

For these reasons, the less-than-significant impacts (with mitigation) under the proposed project related to the spread of wildfire and installation or maintenance of infrastructure that may exacerbate fire risk would be the same under this alternative (less-than-significant impact with mitigation). Mitigation measures prescribed for the proposed project to address these impacts would apply to this alternative. These include MM-WF-1 and MM-WF-2 (implementing pre-construction measures to reduce fire risks during construction and a fire-resistant landscape plan). The less-than-significant proposed project impacts related to emergency evacuation and response and exposure of people or structures to significant risks as a result of runoff, post-fire slope instability, or drainage changes would also occur, but at a reduced level, under this alternative because relatively fewer residents would inhabit the project site (less-than-significant impact, reduced). Additionally, pursuant to the discussion above, the less-than-significant cumulative impacts (with mitigation) related to wildfire would continue to be less than significant (with mitigation), but at a reduced level, under the Reduced Residential alternative.

6.5.3.3 Ability to Meet Project Objectives

The Reduced Residential alternative would result in the development of residential units. As described in Section 6.5.3.1, development of this alternative represents a 30% reduction in residential units and associated residents. The alternative would retain the same non-housing components, including the extension of the JOST as well as the new parks and paseos. The architectural design and themes of this alternative and the associated building materials are assumed to be consistent with those of the proposed project. The proposed circulation system would be consistent with the project's proposed roadways and bikeways.

The Reduced Residential alternative would meet the proposed project objectives related to the provision of residential units (see Table 6-1). In particular, this alternative would provide housing stock and affordable housing to advance compliance with the City's RHNA Goals (Objective 1, Objective 2, and Objective 3). Although this alternative would reduce the provision of housing compared to the proposed project, it would still partially meet these objectives. Specifically, 25% of housing units under this alternative would still be allocated for affordable housing. Implementation of this alternative would provide diverse housing types, including affordable units, to advance the City's RHNA Goals.

Implementation of this alternative would generate revenue for the City; however, the alternative would generate relatively less revenue than the proposed project because it would provide fewer housing units for rent and sale. Therefore, the Reduced Residential alternative would partially meet Objective 4 (see Table 6-1).

The Reduced Residential alternative, consistent with the proposed project, would create gathering spaces and encourage outdoor vehicle-free movement by providing passive and active recreational facilities, including green spaces and outdoor amenity areas. It would also establish recreational amenities within walking distance of residential neighborhoods. As noted above, the alternative would implement the same architectural design and themes as the proposed project. Therefore, the Reduced Residential alternative would meet Objective 5 (see Table 6-1).

Consistent with the proposed project, implementation of the Reduced Residential alternative would complete the comprehensive circulation network with integrated mobility options by connecting pedestrians and bicyclists traveling to a non-vehicular bridge across Portola Parkway to the broader Irvine community to the south and west of Gateway Village. The alternative would establish connectivity between land uses through the extension of the JOST to its connection point with the 700-acre Gateway Preserve via the South Park trailhead, which sustains the City's goals to enhance quality living environments through parks and open space. Therefore, the Reduced Residential alternative would meet Objective 6 (see Table 6-1).

6.6 Environmentally Superior Alternative

CEQA Guidelines Section 15126.6(a) requires that an EIR's analysis of alternatives identify the "environmentally superior alternative" among all of those considered. In addition, Section 15126.6(e)(2) states that if the environmentally superior alternative is the No Project alternative, the EIR must also identify an environmentally superior alternative among the other alternatives. Furthermore, Public Resources Code Sections 21002 and 21081 require lead agencies to adopt feasible mitigation measures or feasible alternatives to substantially lessen or avoid otherwise significant adverse environmental effects, unless specific economic, legal, social, technological, or other conditions make such mitigation measures or alternatives infeasible.

Table 6-2 presents a comparison of the project-level and cumulative impacts of the proposed project and the alternatives.

Based on the discussion in Section 6.3.2, Significant and Unavoidable Project Impacts, the proposed project would result in significant and unavoidable impacts to agriculture, due to the conversion of farmland; air quality, related to conflict with the SCAQMD AQMP and operational VOC thresholds; GHG emissions, due to emissions during project operations and conflict with an applicable GHG plan; land use and planning, due to conflict with an applicable GHG plan; recreation, due to the construction of recreational facilities; and transportation, due to increased VMT.

The No Project/No Development alternative (Alternative 1) would avoid all of the impacts of the proposed project, including the significant and unavoidable impacts referenced above (see Table 6-2). Based on the above analysis and the summary of impacts presented in Table 6-2, the environmentally superior alternative would be Alternative 1: No Project/No Development, because this alternative would consist of no physical development of the project site and would reduce the level of impacts for all proposed project environmental impacts that are either less than significant with mitigation or significant and unavoidable. However, this alternative is a CEQA "No Project" alternative and therefore cannot be considered the environmentally superior alternative.

The No Project/Community Park alternative (Alternative 2) reduces project impacts to the next greatest extent. As shown in Table 6-2 and discussed in Section 6.5.2, implementation of this alternative would reduce significant and unavoidable proposed project air quality, GHG emissions, land use and planning, and transportation impacts to a less-than-significant level. Implementation of this alternative would also reduce less-than-significant project impacts related to aesthetics, energy, hazards and hazardous materials, hydrology and water quality, noise, public services, utilities and service systems, and wildfire; these impacts would remain less than significant but would be lessened. However, consistent with Alternative 1, this alternative is also a CEQA "No Project" alternative; therefore, it cannot be considered the environmentally superior alternative.

Therefore, the Reduced Residential alternative (Alternative 3) is the environmentally superior alternative. Implementation of this alternative would not avoid any of the significant and unavoidable proposed project impacts discussed above. However, it would lessen the severity of significant and unavoidable proposed project impacts

related to air quality, biological resources, GHG, land use and planning, and transportation because it would house fewer residents than the proposed project and avoid sensitive biological areas to the extent feasible. Furthermore, the alternative would also reduce some of the less-than-significant project impacts related to energy, hazards and hazardous materials, hydrology and water quality, noise, public services, utilities and service systems, and wildfire. Because this alternative would include fewer residents occupying the project site, there would be lessened demand for natural resources and services as well as less exposure to health and safety risks. Furthermore, because this alternative involves less extensive construction than the proposed project because of its smaller buildout footprint, it would result in relatively reduced construction-related impacts. For these reasons, the environmentally superior alternative is Alternative 3: Reduced Residential.

Table 6-1. Ability of Alternatives to Meet Project Objectives

Objective	Proposed Project	Alternative 1 No Project/No Development	Alternative 2 No Project/ Community Park	Alternative 3 Reduced Residential
Objective 1: Housing Stock. Provide diverse housing types and opportunities within the City that address a variety of lifestyles, life stages, and economic segments of the marketplace.	Meets objective	Does not meet objective	Does not meet objective	Partially meets objective
Objective 2: Affordable Housing. Consistent with Goal 4 of the City's General Plan Housing Element, provide affordable housing to support balanced housing options at the least cost possible to residents.	Meets objective	Does not meet objective	Does not meet objective	Partially meets objective
Objective 3: RHNA Goals. Contribute new housing units to the City's housing stock, to help satisfy the State of California Regional Housing Needs Assessment (RHNA) for the 2021–2029 planning period, allowing the City to advance their fair share of regional housing growth goals.	Meets objective	Does not meet objective	Does not meet objective	Partially meets objective
Objective 4: City Revenue Generation. Generate net revenue for the City of Irvine General Fund.	Meets objective	Does not meet objective	Partially meets objective	Partially meets objective
Objective 5: Attractive Community and Amenities. Develop a cohesive architectural and landscape themed community with amenities that both residents	Meets objective	Does not meet objective	Partially meets objective	Meets objective

Table 6-1. Ability of Alternatives to Meet Project Objectives

Objective	Proposed Project	Alternative 1 No Project/No Development	Alternative 2 No Project/ Community Park	Alternative 3 Reduced Residential
and guests seek. Create gathering spaces and encourage outdoor vehicle-free movement by providing parks, paseos, streetside green spaces, and outdoor amenity areas. Establish recreational amenities within walking distance of residential neighborhoods.				
Objective 6: Circulation Network. Complete the comprehensive circulation network with integrated mobility options by connecting pedestrians and bicyclists traveling to a non-vehicular bridge across Portola Parkway to the broader Irvine community to the south and west of Gateway Village. Establish connectivity between land uses through the extension of the JOST to its connection point with the 700-acre Gateway Preserve via the South Park trailhead, which sustains the City's goals to enhance quality living environments through parks and open space.	Meets objective	Does not meet objective	Meets objective	Meets objective

Table 6-2. Comparison of Impacts from the Alternatives

Environmental Issue	Proposed Project	Alternative 1 No Project/No Development	Alternative 2 No Project/ Community Park	Alternative 3 Reduced Residential
Aesthetics				
1: Would the project have a substantial adverse effect on a scenic vista?	Less than significant (LS)	No impact (NI)	LS↓	LS
2: Would the project substantially damage scenic resources, including, but not	NI	NI	NI	NI

Table 6-2. Comparison of Impacts from the Alternatives

Environmental Issue	Proposed Project	Alternative 1 No Project/No Development	Alternative 2 No Project/ Community Park	Alternative 3 Reduced Residential
limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				
3: In non-urbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would it conflict with applicable zoning and other regulations governing scenic quality?	LS	NI	LS↓	LS↓
4: Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	LS	NI	LS↓	LS↓
Would the project have a cumulative effect on aesthetics?	LS	NI	LS↓	LS↓
Agriculture and Forestry				
1: Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	Significant and unavoidable (SU)	NI	SU	SU
2: Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?	NI	NI	NI	NI
3: Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by	NI	NI	NI	NI

Table 6-2. Comparison of Impacts from the Alternatives

Environmental Issue	Proposed Project	Alternative 1 No Project/No Development	Alternative 2 No Project/ Community Park	Alternative 3 Reduced Residential
Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104[g])?				
4: Would the project result in the loss of forest land or conversion of forest land to non-forest use?	NI	NI	NI	NI
5: Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	LS	NI	LS	LS
Would the project have a cumulative effect on agriculture and forestry resources?	SU	NI	SU	SU
Air Quality				
1: Would the project conflict with or obstruct implementation of the applicable air quality plan?	SU	NI	LS	SU
2: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	SU	NI	LS	SU↓
3: Would the project expose sensitive receptors to substantial pollutant concentrations?	Less than significant with mitigation incorporated (LSM)	NI	LS	LSM↓
4: Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	LS	NI	LS↓	LS
Would the project have a cumulative effect on air quality resources?	SU	NI	LS	SU↓

Table 6-2. Comparison of Impacts from the Alternatives

Environmental Issue	Proposed Project	Alternative 1 No Project/No Development	Alternative 2 No Project/ Community Park	Alternative 3 Reduced Residential
Biological Resources				
1: Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	LSM	NI	LSM	LSM↓
2: Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	LS	NI	LS	LS↓
3: Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	LSM	NI	LSM	LSM↓
4: Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	NI	NI	NI	NI
5: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	LSM	NI	LSM	LSM

Table 6-2. Comparison of Impacts from the Alternatives

Environmental Issue	Proposed Project	Alternative 1 No Project/No Development	Alternative 2 No Project/ Community Park	Alternative 3 Reduced Residential
6: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	NI	NI	NI	NI
Would the project have a cumulative effect on biological resources?	LSM	NI	LSM	LSM↓
Cultural Resources				
1: Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	NI	NI	NI	NI
2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	LSM	NI	LSM	LSM↓
3: Would the project disturb any human remains, including those interred outside of dedicated cemeteries?	LSM	NI	LSM	LSM↓
Would the project have a cumulative effect on cultural resources?	LSM	NI	LSM	LSM↓
Energy				
1: Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	LS	NI	LS↓	LS↓
2: Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	LS	NI	LS↓	LS↓
Would the project have a cumulative effect on energy resources?	LS	NI	LS↓	LS↓

Table 6-2. Comparison of Impacts from the Alternatives

Environmental Issue	Proposed Project	Alternative 1 No Project/No Development	Alternative 2 No Project/ Community Park	Alternative 3 Reduced Residential
Geology and Soils				
1: Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
a. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42?	NI	NI	NI	NI
b. Strong seismic ground shaking?	LS	NI	LS	LS
c. Seismic related ground failure including liquefaction?	LS	NI	LS	LS
d. Landslides?	LS	NI	LS	LS
2: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	LS	NI	LS	LS
3: Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	LS	NI	LS	LS
4: Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	NI	NI	NI	NI
5: Would the project directly or indirectly destroy a unique	LSM	NI	LSM	LSM

Table 6-2. Comparison of Impacts from the Alternatives

Environmental Issue	Proposed Project	Alternative 1 No Project/No Development	Alternative 2 No Project/ Community Park	Alternative 3 Reduced Residential
paleontological resource or site or unique geologic feature?				
Would the project have a cumulative effect on geology and soils resources?	LSM	NI	LSM	LSM
Greenhouse Gas Emissions				
1: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	SU	NI	LS	SU↓
2: Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	SU	NI	LS	SU↓
Would the project have a cumulative effect on greenhouse gas emissions?	SU	NI	LS	SU↓
Hazards and Hazardous Materials				
1: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	LSM	NI	LSM	LSM
2: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	LSM	NI	LSM	LSM
3: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	NI	NI	NI	NI
4: Would the project be located on a site that is included on a list of hazardous materials sites compiled pursuant to	NI	NI	NI	NI

Table 6-2. Comparison of Impacts from the Alternatives

Environmental Issue	Proposed Project	Alternative 1 No Project/No Development	Alternative 2 No Project/ Community Park	Alternative 3 Reduced Residential
Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				
5: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	NI	NI	NI	NI
6: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	LS	NI	LS↓	LS
7: Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	LSM	NI	LSM↓	LSM↓
Would the project have a cumulative effect on hazards or hazardous materials?	LSM	NI	LSM↓	LSM↓
Hydrology and Water Quality				
1: Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	LS	NI	LS↓	LS
2: Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	LS	NI	LS↓	LS↓
3: Would the project substantially alter the existing drainage pattern of the site or area, including through the	LS	NI	LS↓	LS↓

Table 6-2. Comparison of Impacts from the Alternatives

Environmental Issue	Proposed Project	Alternative 1 No Project/No Development	Alternative 2 No Project/ Community Park	Alternative 3 Reduced Residential
alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: **a.** Result in substantial erosion or siltation on or off site; **b.** Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site; **c.** Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or **d.** Impede or redirect flood flows?				
4: In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?	NI	NI	NI	NI
5: Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	LS	NI	LS↓	LS↓
Would the project have a cumulative effect on hydrology or water quality resources?	LS	NI	LS↓	LS↓
Land Use and Planning				
1: Would the project physically divide an established community?	NI	NI	NI	NI
2: Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	SU	NI	LS	SU↓

Table 6-2. Comparison of Impacts from the Alternatives

Environmental Issue	Proposed Project	Alternative 1 No Project/No Development	Alternative 2 No Project/ Community Park	Alternative 3 Reduced Residential
Would the project have a cumulative effect on land use resources?	SU	NI	LS	SU↓
Noise				
1: Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	LS	NI	LS↓	LS↓
2: Would the project result in generation of excessive groundborne vibration or groundborne noise levels?	LS	NI	LS↓	LS↓
3: For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	NI	NI	NI	NI
Would the project have a cumulative effect on noise resources?	LS	NI	LS↓	LS↓
Population and Housing				
1: Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	LS	NI	LS	LS↓
2: Would the project displace substantial numbers of existing people or housing, necessitating the construction	NI	NI	NI	NI

Table 6-2. Comparison of Impacts from the Alternatives

Environmental Issue	Proposed Project	Alternative 1 No Project/No Development	Alternative 2 No Project/ Community Park	Alternative 3 Reduced Residential
of replacement housing elsewhere?				
Would the project have a cumulative effect on housing and/or population resources?	NI	NI	NI	NI
Public Services				
1: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
Fire protection?	LS	NI	LS↓	LS↓
Police protection?	LS	NI	LS↓	LS↓
Schools?	LS	NI	LS↓	LS↓
Parks?	LS	NI	LS↓	LS↓
Other public facilities?	LS	NI	LS↓	LS↓
Would the project have a cumulative effect on public services resources?	LS	NI	LS↓	LS↓
Recreation				
1: Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	LS	NI	NI	LS↓
2: Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	SU	NI	SU	SU
Would the project have a cumulative effect on recreation resources?	SU	NI	SU	SU↓
Transportation				
1: Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	LS	NI	LS	LS

Table 6-2. Comparison of Impacts from the Alternatives

Environmental Issue	Proposed Project	Alternative 1 No Project/No Development	Alternative 2 No Project/ Community Park	Alternative 3 Reduced Residential
2: Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	SU	NI	LS	SU↓
3: Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	LSM	NI	LS	LSM
4: Would the project result in inadequate emergency access?	LS	NI	LS↓	LS
Would the project have a cumulative effect on transportation resources?	SU	NI	LS	SU
Tribal Cultural Resources				
1: Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: **a.** Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)? **b.** A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the	LSM	NI	LSM	LSM↓

Table 6-2. Comparison of Impacts from the Alternatives

Environmental Issue	Proposed Project	Alternative 1 No Project/No Development	Alternative 2 No Project/ Community Park	Alternative 3 Reduced Residential
criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?				
Would the project have a cumulative effect on tribal cultural resources?	LSM	NI	LSM	LSM↓
Utilities and Service Systems				
1: Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	LS	NI	LS	LS
2: Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	LS	NI	LS↓	LS↓
3: Would the project result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	LS	NI	LS↓	LS↓
4: Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	LS	NI	LS↓	LS↓

Table 6-2. Comparison of Impacts from the Alternatives

Environmental Issue	Proposed Project	Alternative 1 No Project/No Development	Alternative 2 No Project/ Community Park	Alternative 3 Reduced Residential
5: Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	LS	NI	LS↓	LS↓
Would the project have a cumulative effect on utilities and/or service systems resources?	LS	NI	LS↓	LS↓
Wildfire				
1: Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?	LS	NI	LS↓	LS↓
2: Due to slope, prevailing winds, and other factors, would the project exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	LSM	NI	LSM↓	LSM↓
3: Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	LSM	NI	LSM↓	LSM
4: Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	LS	NI	LS↓	LS↓
Would the project have a cumulative effect on wildfire?	LSM	NI	LSM↓	LSM↓

Notes: NI = no impact; LS = less-than-significant impact; LSM = less-than-significant impact with mitigation incorporated; SU = significant and unavoidable impact; ↑ = increased compared to proposed project; ↓ = reduced compared to proposed project.

6.7 References

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