

SECTION 6.0 ALTERNATIVES

6.1 Introduction

The CEQA Guidelines provide that an Environmental Impact Report (EIR) must identify ways to mitigate or avoid a Project’s significant effects on the environment. In compliance with CEQA Guidelines Section 15126.6(a), the EIR must describe “... a range of reasonable alternatives to the Project, or to the location of the Project which would feasibly attain most of the basic objectives of the Project but would avoid or substantially lessen any of the significant effects of the Project.” The EIR need not consider every conceivable alternative; rather it must consider a reasonable range of potentially feasible alternatives to the Project, or to the location of the Project, which would avoid or substantially lessen significant effects of the Project, even if “... these alternatives would impede to some degree the attainment of the Project objectives, or would be more costly” (*CEQA Guidelines* Section 15126.6(b)). An EIR is not required to consider alternatives which are infeasible (*CEQA Guidelines* Section 15126.6(a)). Among the factors that may be used to eliminate alternatives from consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts. An EIR is not required to consider alternative which are infeasible (*CEQA Guidelines* Section 15126.6(c)). The discussion of Project alternatives must “... include sufficient information about each (to) allow meaningful evaluation, analysis, and comparison with the proposed Project.” An EIR must evaluate a “No Project” alternative in order to allow decision-makers to compare the effect of approving the Project to the effect of not approving the Project (*CEQA Guidelines* Section 15126.6(e)). An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative (*CEQA Guidelines* Section 15126.6(f)).

The City, acting as the CEQA Lead Agency, is responsible for selecting a range of Project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. The range of alternatives addressed in an EIR is governed by a “rule of reason,” which requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. Of the alternatives considered, the EIR need examine in detail only those the Lead Agency determines could feasibly attain most of the basic objectives of the Project but would avoid or substantially lessen any of the significant effects of the proposed Project. Per *CEQA Guidelines* Section 15364, “feasible” has been defined as “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, and environmental, legal, social, and technological factors” and per Section 15126.6, the factors that may be taken into account when addressing feasibility are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site.

6.2 Project Objectives

The following project objectives have been developed for the proposed Project:

- Provide new for-sale housing that is responsive to market conditions and provides a uniquely designed product type that is currently limited elsewhere in the City.
- Design the grading and geotechnical stabilization to ensure site stability consistent with City codes and minimize grading into the existing previously stabilized landslide mass.
- Design the grading and geotechnical stabilization to minimize off-site grading and balance the earthwork on site to minimize import/export, which would reduce air quality, noise, and traffic impacts from truck traffic on adjacent residential uses and City roadways.
- Redevelop the previously existing residential site with a residential project consistent with existing General Plan and Zoning designations that provides an updated housing product to meet the City's growing population and further address the City's and state's housing needs.
- Create a financially successful development that is fiscally responsible by equitably contributing to the expansion and operation of the public services and facilities impacted by the project through the payment of fees.
- Improve the aesthetic character along Crown Valley Parkway through enhanced landscaping consistent with General Plan policies.

6.3 Summary of the Proposed Project's Environmental Effects

The analysis provided in Sections 3.0 and 4.0 determined that by complying with standard conditions of approval, implementing project design features, and implementing mitigation measures, no significant unavoidable impacts would occur. To satisfactorily provide the CEQA-mandated alternatives analysis, the alternatives considered must reduce or eliminate significant impacts from a project. Because the Project does not cause any significant unavoidable impacts, no project alternative would eliminate a significant unavoidable impact and therefore the alternatives presented may incrementally reduce or increase the intensity of impacts. Table 6-1 summarizes the proposed Project's environmental effects analyzed in Sections 3.0 and 4.0.

Table 6-1. Environmental Effects of Proposed Project

Environmental Factor		No Impact or Less than Significant Impact	Less than Significant Impact with Mitigation	Significant and Unavoidable Impact
Aesthetics	Scenic Vistas	X	—	—
	Scenic Highways	X	—	—
	Scenic Quality	X	—	—
	Light and Glare	X	—	—

Environmental Factor		No Impact or Less than Significant Impact	Less than Significant Impact with Mitigation	Significant and Unavoidable Impact
	Cumulative	X	—	—
Agricultural and Forestry Resources	Conversion of Prime, Unique, or Statewide Important Farmland to Non-Agricultural Use	X	—	—
	Conflict with Agricultural Zoning or Williamson Act	X	—	—
	Conflict with Existing Forest Land Zoning or Cause Rezoning of Forest Land	X	—	—
	Conversion of Forest Land to Non-Forest Use	X	—	—
	Other Changes that would Convert Farmland or Forest Land	X	—	—
	Cumulative	X	—	—
Air Quality	Conflict with or Obstruct an Air Quality Plan	X	—	—
	Result in Cumulatively Considerable Net Increase in any Criteria Pollutant	X	—	—
	Expose Sensitive Receptors to Substantial Pollutant Concentrations	X	—	—
	Create Objectionable Odors	X	—	—
	Cumulative	X	—	—
Biological Resources	Candidate, Non-listed Sensitive, or Special-Status Species	X	—	—
	Riparian Habitat or Other Sensitive Natural Communities	X	—	—

Environmental Factor		No Impact or Less than Significant Impact	Less than Significant Impact with Mitigation	Significant and Unavoidable Impact
	Jurisdictional Waters/Wetlands	X	—	—
	Wildlife Movement and Migratory Species	—	X	—
	Adopted Policies and/or Ordinances	X	—	—
	Adopted Habitat Conservation Plans	X	—	—
	Cumulative	X	—	—
Cultural Resources	Historic Resources	X	—	—
	Archaeological Resources	—	X	—
	Human Remains	—	X	—
	Cumulative	X	—	—
Energy	Wasteful, Inefficient, or Unnecessary Consumption of Energy	X	—	—
	Conflict with Renewable Energy or Energy Efficiency Plan	X	—	—
	Cumulative	X	—	—
Geology and Soils	Alquist-Priolo Fault Rupture	X	—	—
	Ground Shaking	—	X	—
	Seismic-Related Ground Failure	X	—	—
	Landslides	—	X	—
	Soil Erosion or Loss of Topsoil	X	—	—
	Unstable Soils	—	X	—
	Expansive Soils	—	X	—
	Inadequate Soils for Septic Tanks	X	—	—
	Destroy unique Paleontological Resource	—	X	—

Environmental Factor		No Impact or Less than Significant Impact	Less than Significant Impact with Mitigation	Significant and Unavoidable Impact
	Cumulative	X	—	—
Greenhouse Gas Emissions	Greenhouse Gas Emissions	X	—	—
	Conflict with Applicable Plan Policy, or Regulation	X	—	—
	Cumulative	X	—	—
Hazards and Hazardous Materials	Routine Transport, use, or Disposal of Hazardous Materials	X	—	
	Reasonably Foreseeable Upset and Accident Conditions	X	—	
	Emissions or Hazardous Materials Near Existing or Proposed School	X	—	
	Located on a Listed Hazardous Materials Site	X	—	
	Within an Airport Land Use Plan or Within Two Miles of a Public Airport	X	—	—
	Within Airport Land Use Plan or Near Vicinity of a Public Airport	X	—	—
	Interfere with Emergency Response Plan	X	—	—
	Wildland Fire Risks	X	—	—
	Cumulative	X	—	—
Hydrology and Water Quality	Violate Water Quality Standards or Waste Discharge Requirements	X	—	—
	Decrease Groundwater Supplies	X	—	—
	Alter Drainage Resulting in Erosion or Siltation Offsite	X	—	—

Environmental Factor		No Impact or Less than Significant Impact	Less than Significant Impact with Mitigation	Significant and Unavoidable Impact
	Increase Surface Runoff Causing Flooding	X	—	—
	Create Runoff Water Exceeding Storm Drain Capacity	X	—	—
	Impede or Redirect Flood Flows	X	—	—
	Risk Release of Pollutants Due to Project Inundation	X	—	—
	Conflict with or Obstruct Water Quality Control or Sustainable Groundwater Management Plan	X	—	—
	Cumulative	X	—	—
Land Use and Planning	Physically Divide an Established Community	X	—	—
	Conflict with Applicable Land Use Plans, Policies, or Regulations	X	—	—
	Cumulative	X	—	—
Mineral Resources	Loss of Statewide or Regional Important Mineral Resources	X	—	—
	Loss of Locally Important Mineral Resources	X	—	—
	Cumulative	X	—	—
Noise	Generation of Construction Noise in Excess of Standards Established by the General Plan or Noise Ordinance	X	—	—
	Generation of Operational Noise in Excess of Standards Established by the General Plan or Noise Ordinance	X	—	—

Environmental Factor		No Impact or Less than Significant Impact	Less than Significant Impact with Mitigation	Significant and Unavoidable Impact
	Groundborne Vibration or Noise	X	—	—
	Exposure to Excessive Noise from Private or Public Airport	X	—	—
	Cumulative	X	—	—
Population and Housing	Population Growth	X	—	—
	Displace People or Housing	X	—	—
	Cumulative	X	—	—
Public Services	Fire Protection Facilities	X	—	—
	Police Protection Facilities	X	—	—
	School Facilities	X	—	—
	Library Facilities	X	—	—
	Other Facilities	X	—	—
	Cumulative	X	—	—
Recreation	Existing Recreational and Park Facilities	X	—	—
	New or Physically Altered Recreation and Park Facilities	X	—	—
	Cumulative	X	—	—
Transportation and Traffic	Conflict with Program, Plan, Ordinance, or Policy Addressing the Circulation System, Including Transit, Roadway, Bicycle and Pedestrian Facilities	X	—	—
	Conflict with CEQA Guidelines 15064.3, Subdivision (b)	X	—	—
	Hazard Due to Design Features or incompatible Uses	—	X	—
	Inadequate Emergency Access	X	—	—

Environmental Factor		No Impact or Less than Significant Impact	Less than Significant Impact with Mitigation	Significant and Unavoidable Impact
	Cumulative	X	—	—
Tribal Cultural Resources	Substantial Adverse Change to Listed or Eligible Tribal Cultural Resources	X	—	—
	Substantial Adverse Change to Lead Agency Defined Tribal Cultural Resources	—	X	—
	Cumulative	X	—	—
Utilities and Service Systems	Construction of New or Expanded Water, Wastewater Treatment or Storm Water Drainage, Electric Power, Natural Gas, or Telecommunications Facilities Causing Significant Environmental Effects	X	—	—
	Sufficient Water Supplies	X	—	—
	Wastewater Treatment Capacity	X	—	—
	Generate Excess Solid Waste, Exceed Landfill Capacity, Impair Solid Waste Reduction Goals	X	—	—
	Compliance with Solid Waste Regulations	X	—	—
	Cumulative	X	—	—
Wildfire	Impair Adopted Emergency Response or Evacuation Plan	X	—	—
	Exacerbate Wildfire Risks and Expose Occupants to Pollutant Concentrations from a Wildfire or the Uncontrolled Spread of a Wildfire	X	—	—

Environmental Factor		No Impact or Less than Significant Impact	Less than Significant Impact with Mitigation	Significant and Unavoidable Impact
	Install or Maintain Infrastructure Exacerbating Fire Risk or Result in Temporary or Ongoing Impacts	X	—	—
	Expose People or Structures to Risks from Runoff, Post-fire Slope Instability, or Drainage Changes	X	—	—
	Cumulative	X	—	—

6.4 Alternatives Considered But Not Analyzed Further

Factors considered in selecting project alternatives include site suitability, availability of infrastructure, applicable plans or regulatory limitations, economic viability, and whether the Project proponent can reasonably acquire, control, or otherwise have access to alternative sites, redesignate land use, etc. In addition, an EIR is not required to consider an alternative whose impact cannot be reasonably ascertained and whose implementation is remote or speculative (*CEQA Guidelines* Section 15126.6 (f)(3)). Alternatives considered in an EIR are selected by a “rule of reason,” requiring those alternatives necessary to avoid or substantially lessen significant effects of the proposed project, while attaining most of the basic objectives of the project. Among the factors that may be used to eliminate alternatives from consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts. An EIR is not required to consider alternative which are infeasible (*CEQA Guidelines* Section 15126.6(c)). Based on these factors, the following alternatives have been considered but eliminated from further consideration.

6.4.1 Offsite Location

State CEQA Guidelines Section 15126.6(f)(2) requires consideration of alternative locations. The question CEQA intends to answer is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. To provide a consistent analysis for a similar 22-lot subdivision with a similar product type, an equivalent off-site location would need to contain approximately two acres of developable area, zoned for multi-family residential, and adequately served by available utilities. In addition, an alternative site would have to add approximately two acres of area or half of the property’s acreage that, like Lot A, is a lettered where no residential development is allowed. Based on these attributes of the proposed Project,

the City has determined that such an alternative site location is not available and therefore no further consideration of this alternative is provided in this EIR.

6.4.2 GPA to a Single-Family Land Use

This alternative would change the General Plan land use designation of proposed Lot 1 from Residential Attached to Residential Detached to allow development of a small single-family residential development of one home per lot, resulting in approximately 10 dwelling units. This alternative would also require a zone change from Multi-family District (RM) to Single-Family District 3 (RS-3) or 4 (RS-4). This alternative would be in direct conflict with SB330, which restricts the adoption of land use or zoning amendments that would result in the reduction of allowed residential density or intensity of land uses compared to what is allowed under the regulations in effect on January 1, 2018. The Housing Accountability Act also prohibits an agency from disapproving a project or imposing conditions that the project be developed at a lower density if the project is consistent with applicable, objective general plan, zoning, and subdivision standards and criteria, absent specific, narrow findings. (Gov. Code 65589.5.) Additionally, under CEQA Guidelines Section 15126.6, the factors that may be taken into account for feasibility include general plan consistency. Furthermore, while this alternative would generate fewer dwelling units, this alternative would not eliminate any other significant impacts. For these reasons, the GPA to single-family land use alternative was rejected from further consideration.

6.4.3 GPA to a Non-Residential Land Use

This alternative would change the General Plan land use designation of proposed Lot 1 from Residential Attached to Neighborhood Commercial, Community Commercial, Professional Office, or some other non-residential land use designation. This alternative would also require a zone change from Multi-family District (RM) to the appropriate non-residential zoning district. This alternative would also be in direct conflict with SB330, which restricts the adoption of land use or zoning amendments that would result in the reduction of allowed residential density or intensity of land uses than what is allowed under the regulations in effect on January 1, 2018. The Housing Accountability Act also prohibits an agency from disapproving a project or imposing conditions that the project be developed at a lower density if the project is consistent with applicable, objective general plan, zoning, and subdivision standards and criteria, absent specific, narrow findings. (Gov. Code 65589.5.) Additionally, under CEQA Guidelines Section 15126.6, the factors that may be taken into account for feasibility include general plan consistency. Furthermore, this alternative would likely increase operational noise impacts, potentially inconsistent with surrounding residential uses. For these reasons, the GPA to a non-residential land use alternative was rejected from further consideration.

6.5 Alternatives Under Consideration

6.5.1 Alternative Descriptions

The following alternatives have been identified and evaluated to provide decision-makers with a reasonable range of Project alternatives that would eliminate or reduce the impacts of the proposed Project. Factors considered in selecting the alternatives include site suitability, availability of infrastructure, general plan consistency, other applicable plans or regulatory limitations, jurisdictional boundaries, and economic viability. An EIR is not required to consider an alternative whose impact cannot be reasonably ascertained and whose implementation is remote or speculative (CEQA Guidelines Section 15126.6 (f(3))).

In accordance with the CEQA Guidelines, the alternatives considered in this EIR include those that (1) could accomplish most of the basic objectives of the Project, (2) are reasonably feasible given the nature of the Project and surrounding land uses, and (3) could avoid or substantially lessen one or more of the significant impacts of the Project.

6.5.1.1 Alternative 1: No Project No Build

This alternative assumes that no new development would occur on the 4.2-acre parcel. No ground-disturbing activities would take place, nor would any multi-family structures be erected. Under this alternative, the potential impacts associated with development of the proposed Project would not occur. This alternative provides for an analysis of the existing baseline conditions at the time the Notice of Preparation (NOP) was published, as well as what would be reasonably expected to occur in the foreseeable future if the proposed Project were not approved. The discussion compares the environmental effects of the Project site remaining in its existing state against environmental effects which would occur if the proposed Project were approved.

Maintaining the site's existing improvements and uses would not fulfill any of the Project objectives. This alternative would be the environmentally superior alternative compared to the proposed Project, however under CEQA the No Build alternative cannot be the environmentally superior alternative.

6.5.1.2 Alternative 2: Maximum Development Density Identified in the General Plan

This alternative allows for the maximum number of residential attached dwelling units permitted by the General Plan on the 4.2-acre Project site. This alternative would result in the development of 41 dwelling units, which is the number of units previously developed on the Project site prior to the landslide. This alternative assumes all of the dwelling units would be placed on Lot 1, the 2-acre portion of the Project site proposed for development. The remaining 2.2 acres would be placed in a letter lot that does not permit the construction of residential units, similar to the proposed Project. Alternative 2 is graphically depicted in Figure 6.5.A.

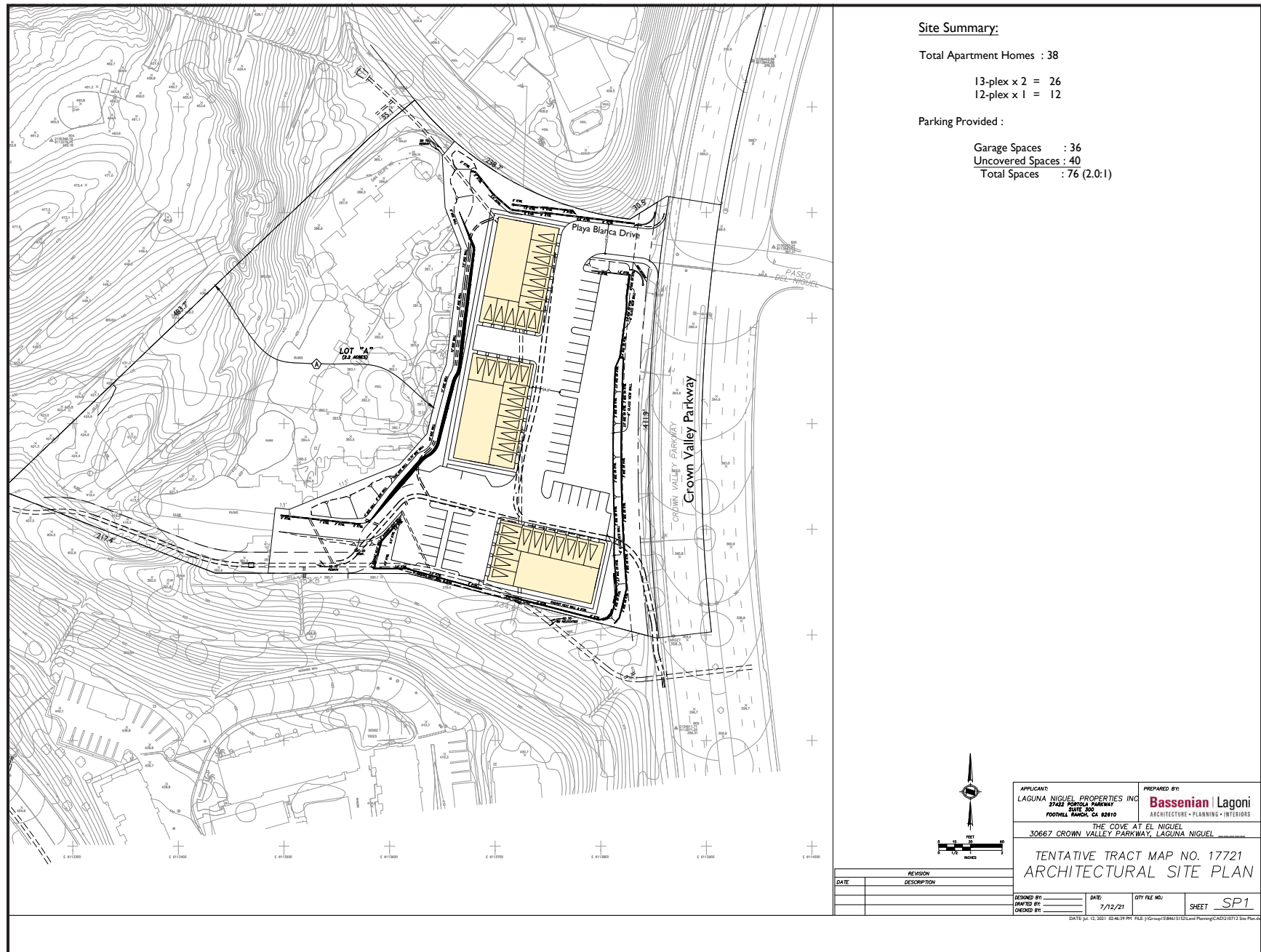
6.5.1.3 Alternative 3: Reduced Density

This Reduced Density alternative assumes construction of 8 duplex structures, 16 dwelling units, on the 4.2-acre subdivided parcel comprised of Lot 1, the 2-acre area proposed for Project development, and Lot A, the 2.2-acre area of open space similar to the proposed Project. This alternative provides 16 units. Total parking spaces provided would be 63, comprised of 24 garage parking spaces, 8 shared parking spaces, and 11 guest parking spaces. The additional space on the site would remain for landscaping, building setbacks, active recreation space, storm water infiltration, and open space. This alternative would reduce the total number of residents from 57 to 42 compared to the proposed Project. Alternative 3 is graphically depicted in Figure 6.5.B.

6.5.1.4 Alternative 4: Higher Density Larger Footprint 38-units

The Higher Density Larger Footprint 38 Units alternative would construct a denser residential product similar to a multi-family project that was proposed for the site in 2014. This Alternative eliminates the open space proposed by the Project in order to spread out development of the structures over a larger portion of the site. Alternative 4 would utilize the entire 4.2-acre parcel to construct 19 duplexes and 38 dwelling units. This alternative would eliminate the 2.2 acres of open space included in the proposed Project and instead construct 11 additional duplexes on the site over and above the proposed Project. As a result, this would increase the number of residents from 57 to 99 in comparison to the proposed Project. Additionally, parking would increase to 76 total garage spaces and 30 guest parking spaces. Three terraced six-foot high retaining walls would be constructed in the southwest part of the site to build pads on the upper west portion of the site (proposed Lot A of the Project). Access to the site would remain at Playa Blanca, and private Drive B would be lengthened to gain access to the additional dwellings on the west side of the site. Additional terraced retaining walls are introduced at the west end of the site to increase the buildable area. Furthermore, the additional space on the alternative site would be used for landscaping, building setbacks, active recreation space, and storm water infiltration. Alternative 4 is graphically depicted in Figure 6.5.C.

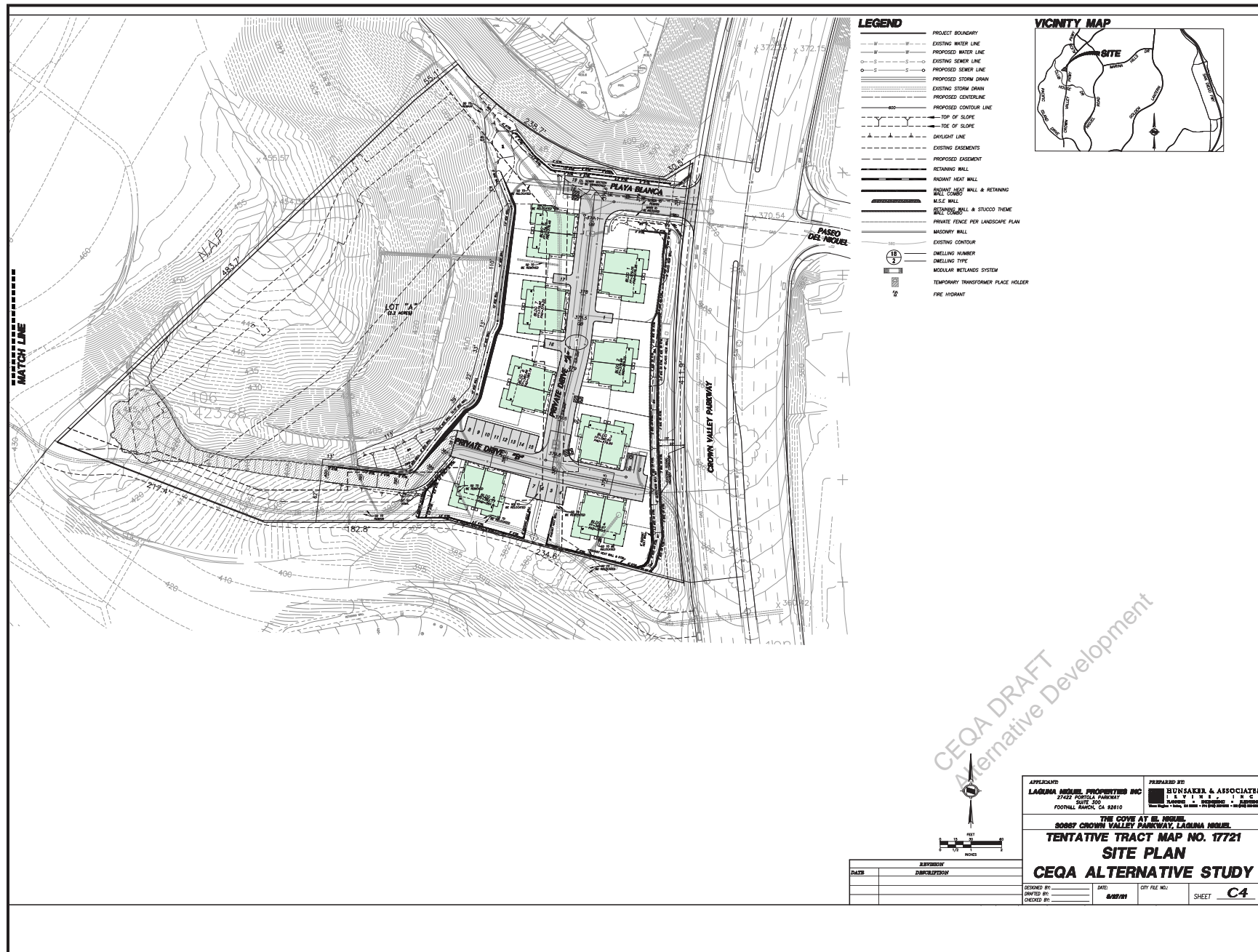
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Source: Bassenian|Lagoni (7/12/2021).

Figure 6.5.A Alternative 2 - Maximum Development Density

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Source: Hunsaker&Associates (5/27/2021).

Figure 6.5.B Alternative 3 – Reduced Density

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Source: RBF Consulting (1/29/2014).

Figure 6.5.C Alternative 4 – Higher Density

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6.5.2 Environmental Impacts that are Similar to the Proposed Project

The No Project No Build Alternative would result in reduced impacts in comparison to the proposed Project. For the three alternatives considered that envision development on the site, eight of the twenty environmental factors would either not be impacted or would be impacted in the same or approximately the same manner and degree as the proposed Project. Rather than repeat a discussion of these non-significant impacts under Alternatives 2 through 4, a discussion of the following environmental issues that are common to each alternative and the proposed Project is presented below.

- Agriculture and Forestry Resources
- Cultural Resources
- Greenhouse Gases
- Mineral Resources
- Population and Housing
- Public Services
- Tribal Cultural Resources
- Utilities and Service Systems

The proposed Project and the alternatives would have a similar level of impact associated with these areas. A discussion is provided in Section 6.5.3 for each alternative related to the environmental factors that differ between project alternatives or require mitigation to reduce an impact to a less than significant level.

6.5.2.1 Agriculture and Forestry Resources

As discussed in Section 3.2.1, there are no mapped Prime Farmlands, Unique Farmlands, or Farmlands of Statewide importance within the City. The LNGP and LNMC do not identify any areas with an agricultural or forestry land use designation or zone, and there are no operating agricultural or forestry operations. Consequently, impacts to farmland or forest land resources resulting from Alternatives 1 through 4 would also be less than significant and no mitigation would be required in the same manner as the proposed Project.

6.5.2.2 Cultural Resources

As discussed in Section 4.4, the proposed Project site is currently vacant, is not occupied by an historic resource, and has never been occupied by an historic resource. Implementation of the proposed Project would not cause a substantial adverse change in the significance of a historical resource. Although Alternative 4 would result in development within proposed Lot A, historic resources do not exist on the entire 4.2-acre Project site. Implementation of Alternatives 1 through 4 would not impact historic resources, resulting in a less than significant with no mitigation required in the same manner as the proposed Project.

As discussed in Section 4.4, the records search revealed three cultural resources within ½ mile of the Project site. However, the previous field surveys and the field survey conducted for the proposed Project did not reveal the presence of archeological resources. In the unlikely event archaeological resources are encountered during site grading or earthmoving activities, implementation of **Mitigation Measure MM CUL-1** would render impacts to less than significant. Although Alternative 4 would result in development within proposed Lot A, archaeological resources are unlikely to be encountered due to the prior disturbances onsite including construction of the original residential development in 1979, the Via Estoril Landslide in 1998, and slope remediation that occurred between 1998 and 2000. Implementation of Alternatives 1 through 4 would not impact archaeological resources, resulting in a less than significant impact with the same mitigation measure (**MM CUL-1**) that is required for the proposed Project implemented for Alternatives 2-4.

As discussed in Section 4.4, the likelihood of encountering human remains during site grading or earthmoving activities is minimal because the site was previously developed, a significant portion was disturbed during the Via Estoril Landslide and subsequent slope remediation, and the site has never been a cemetery. In the unlikely event archaeological resources are encountered during site grading or earthmoving activities, implementation of **Mitigation Measure MM CUL-1** would render impacts to less than significant. Although Alternative 4 would result in development within proposed Lot A, human remains are unlikely to be disturbed due to the prior site disturbances. Implementation of Alternatives 1 through 4 would not impact human remains, resulting in a less than significant impact with the same mitigation measure (**MM CUL-1**) that is required for the proposed Project implemented for Alternatives 2-4.

6.5.2.3 Greenhouse Gases

As discussed in Section 4.7, the City's CEQA Manual establishes threshold criteria for screening out small development projects from detailed GHG analysis. The City has established a threshold of 3,000 MTCO₂e/year for smaller residential projects such as 50 dwelling units with no demolition, no overlapping grading and building construction, which are screened out from detailed GHG analysis and GHG emissions are considered less than significant. Alternatives 2, 3 and 4 would result in development of 41, 16, and 38 dwelling units, respectively. All the alternatives are below the 50 dwelling unit screening threshold, and would be screened out from detailed GHG analysis. GHG emissions for all alternatives would be considered less than significant and no mitigation would be required in the same manner as the proposed Project.

6.5.2.4 Minerals

As discussed in Section 3.2.2, the Project site is designated MRZ-1. MRZ-1 is defined as an area containing no significant mineral deposits, or an area not likely to contain significant mineral deposits. Consequently, impacts to mineral resources resulting from Alternatives 1 through 4

would be less than significant and no mitigation would be required in the same manner as the proposed Project.

6.5.2.5 Population and Housing

As discussed in Section 3.2.3, the Project site is designated Residential Attached in the Laguna Niguel General Plan (LNGP) and is zoned Multi-family District (RM), and the Project is consistent with existing land use and zoning. The proposed Project would accommodate approximately 63 residents, a less than one-tenth of one percent increase in population in comparison to the City's 2020 estimated population of 67,285. The increase in population from the proposed Project is de minimis, resulting in less than significant impacts and no mitigation is required. Alternative 2 would accommodate 117 residents, Alternative 3 would accommodate 46 residents, and Alternative 4 would accommodate 109 residents. Although Alternatives 2 and 4 would result in an increase in the number of residents, the population increase would still represent a less than one-tenth of one percent increase in population in comparison to the City's 2020 estimated population. This increase in population from the Alternatives would be de minimis and not cause physical impacts to the environment associated with accommodating the additional residents.

As discussed in Section 3.2.3, construction activities associated with the proposed Project would not indirectly stimulate the need for additional housing or services. The proposed Project would not extend new roads and supporting infrastructure in areas where infrastructure does not currently exist. Connections to existing infrastructure would be made to service the Project site as opposed to servicing the surrounding areas. Therefore, the proposed Project would not induce indirect population growth by extending infrastructure to previously undeveloped areas.

Consequently, impacts from direct or indirect induced population and housing growth resulting from Alternatives 2 through 4 would be less than significant and no mitigation would be required in the same manner as the proposed Project.

6.5.2.6 Public Services

As discussed in Section 3.2.4, the Project is not expected to result in an additional strain on fire and police protection services such that new or expanded facilities would be required. The Project would be required to pay statutory school impact fees to fully mitigate the addition of students to CUSD facilities. The Project would provide a total of 0.51 acres of common and active recreation areas, surpassing the zoning code minimum requirement of 0.49 acres, and therefore reduce a potential strain on parks and park services. The increase in library services from the Project would not be substantial, and new or expanded facilities would not be required as a result of the Project. In addition, the County of Orange stopped levying their impact fee for the County Branch Libraries in 2013, stating necessary library facilities have been constructed and fees are no longer needed since additional libraries are no longer needed. Impacts related to other public facilities would be less than significant, and no mitigation is required.

Impacts from development of Alternatives 2 through 4 on fire, police, schools, and library services would be the same as the proposed Project because even though Alternatives 2 and 4 generate more residents, the number of new residents is so small compared to the population of the City that the additional residents would not trigger the need for additional police, fire, or library services. Consequently, impacts to public services resulting from Alternatives 2 through 4 would be less than significant and no mitigation would be required in the same manner as the proposed Project.

6.5.2.7 Tribal Cultural Resources

As discussed in Section 4.13, the Project site is not listed or eligible for listing in the California Register, or in a local register of historical resources. As previously discussed in Section 4.4, Cultural Resources, the records search obtained for the proposed Project indicates that no listed properties or resources exist on the Project site. Results from prior surveys and archaeological reports conducted on the Project site were negative for cultural resources. As discussed in Chapter 4.6, *Geology and Soils*, grading of the Project site will result in minimal disturbance to native soils. This is due to a substantial amount of earthwork was conducted on the site as part of the original development in 1979 and during the grading activities that took place between 1998 and 2000 after the Via Estoril Landslide to secure the slope. Results from prior surveys and archaeological reports conducted on the Project site were negative for cultural resources. As a result, the Project is considered to have a low potential to impact prehistoric and historic cultural resources, including tribal cultural resources. The Juaneno Band of Mission Indians, Acjachemen Nation-Belardes request that a representative from the Juaneno Band of Mission Indians, Acjachemen Nation-Belardes be retained to provide cultural resources awareness training and spot check monitoring up to 10 hours per week during ground disturbing activities, which are included as **Mitigation Measure MM TCR-1 and Mitigation Measure MM TRC-2**.

Even though it is extremely unlikely that tribal cultural resources would be impacted, there is a potential for unknown tribal cultural resources to be unearthed if ground disturbing activities change, resulting in a potential impact requiring mitigation. **Mitigation Measure MM TCR-3** would be required in order to halt activities, assess the significance of the unearthed resources, and determine final disposition of the resource as appropriate. With the implementation of **MM TCR-1** through **MM TCR-3** impacts to tribal cultural resources would be less than significant.

Impacts from development of Alternatives 2 through 4 on listed or eligible for listing tribal cultural resources would be the same as the proposed Project. Although Alternative 4 would result in development within proposed Lot A, tribal cultural resources are unlikely to be encountered due to the prior disturbances onsite and remediation of the prior landslide. Consequently, impacts to listed or eligible for listing tribal cultural resources resulting from Alternatives 2 through 4 would be less than significant with implementation of the same mitigation measures (**Mitigation Measure MM TCR-1** through **MM TCR-3**) as the proposed Project.

6.5.2.8 Utilities and Service Systems

As discussed in Section 3.2.6, connections to existing utilities and services are readily available onsite, in adjacent property, and in Crown Valley Parkway. Minimal abandonment of existing utilities and service systems would be required to accommodate the Project. The increase in demand on utilities and service systems from the Project is considered to be minimal, and the Project will be adequately served by water, wastewater, natural gas, electricity, storm water, and telecommunications service providers. The proposed Project would not require the relocation, expansion, or construction of any physical improvements related to the provision of these utilities that would result in impacts to the environment. Project impacts would be less than significant, and no mitigation is required. Increased demand on these utilities from development of Alternatives 2 through 4 would be the same or similar as the proposed Project because the additional dwelling units and consequently residents would be so small and not trigger the need for additional utility facilities or services. The alternatives would not require the relocation, expansion, or construction of any physical improvements related to the provision of these utilities that would result in impacts to the environment. Consequently, impacts from increased water, wastewater, natural gas, electricity, storm water, and telecommunications service demands resulting from development of Alternatives 2 through 4 would be less than significant and no mitigation would be required in the same manner as the proposed Project.

As discussed in Section 3.2.6, water supplies are adequate to accommodate the Project during normal, dry and multiple dry years. Impacts are less than significant, and no mitigation measures are required. Due to the small quantity of dwelling units resulting from Alternatives 2 through 4, impacts from development of the alternatives on water supplies would be the same as the proposed Project. Consequently, impacts on water supplies resulting from Alternatives 2 through 4 would be less than significant and no mitigation would be required in the same manner as the proposed Project.

As discussed in Section 3.2.6, Moulton Niguel Water District (MNWD) has adequate and available wastewater treatment capacity to accommodate increased wastewater flows from the proposed Project. Due to the small quantity of dwelling units resulting from Alternatives 2 through 4, impacts from development of the alternatives on wastewater treatment facilities would be the same as the proposed Project. Consequently, impacts to wastewater treatment facilities resulting from Alternatives 2 through 4 would be less than significant and no mitigation would be required in the same manner as the proposed Project.

As discussed in Section 3.2.6, local landfills would be able to accommodate solid waste generation from the Project and the Project would comply with solid waste reduction goals and regulations. Due to the small quantity of dwelling units resulting from Alternatives 2 through 4, impacts from development of the alternatives on landfills and solid waste regulations would be the same as the proposed Project. Consequently, impacts to waste management resulting from Alternatives 2

through 4 would be less than significant and no mitigation would be required in the same manner as the proposed Project.

6.6 Alternative Impact Analysis

The No Project No Build Alternative would result in reduced impacts in comparison to the proposed Project. For the three alternatives considered that envision development on the site, eight of the twenty environmental factors would either not be impacted or would be impacted in the same or approximately the same manner and degree as the proposed Project. Rather than repeat a discussion of these non-significant impacts under Alternatives 2 through 4, a discussion of the following environmental issues that are common to each alternative and the proposed Project is presented below.

6.6.1 Alternative 1: No Project Alternative

Under the No Project No Build Alternative, no development would occur on the Project site. No site preparation, grading, or building construction would occur and no environmental impacts would occur. This alternative would not meet any of the Project objectives as identified in Table 6.A. In addition, under CEQA the No Build alternative cannot be the environmentally superior alternative. As result, this alternative is rejected from further analysis.

6.6.2 Alternative 2: Maximum Development Density Identified in the General Plan

As presented in 6.5.1, this alternative allows for the maximum residential attached development of 41 dwelling units permitted by the General Plan on the 4.2-acre subdivided parcel. This Alternative assumes Lot 1 (2-acres) is the developable portion of the Project site and Lot A (2.2-acres) would be open space similar to the proposed Project.

6.6.2.1 Aesthetics

As discussed in Section 4.1, *Aesthetics*, the proposed Project includes project design features **PDF AES-1** through **AES-4** and, the Project would result in a less than significant impact regarding scenic vistas, scenic resources within State scenic highways, compliance with applicable scenic quality zoning and regulations, and light and glare. Alternative 2 would result in more development on the Project site but within the same lower, flatter, eastern portion of the site covered by proposed Lot 1. This Alternative would contain the same or similar project design features as those identified by **PDF AES-1** through **AES-4** for the proposed Project regarding open space (proposed Lot A), architecture design elements, vegetation and landscaping, and lighting. Impacts to aesthetics resulting from Alternative 2, Maximum Development Density Identified in the General Plan, would be less than significant and no mitigation is required, in the same manner as the proposed Project.

6.6.2.2 Air Quality

As discussed in Section 4.2, *Air Quality*, the proposed Project would not conflict with or obstruct implementation of the applicable air quality plan, violate any air quality standards, result in cumulatively considerable net increase in any criteria pollutant, expose sensitive receptors to substantial pollutant concentrations, or create objectionable odors. Construction of the proposed Project would comply with applicable rules and regulations reducing air pollution emissions including SCAQMD Rule 402, 403 and 1113 prohibiting air discharge nuisance, reduce dust emissions during earthmoving activities, and reduce VOC emissions from the application of architectural coatings. The Project would generate short-term construction and long-term operational emissions, which would all be at levels below applicable air quality standards. Although development of Alternative 2 would result in more development on the Project site, the development footprint would be contained within Lot 1 in the same way as the proposed Project and generate the same level of short-term construction emissions as the proposed Project. Daily construction emissions for any given increment of development would be the same or only incrementally larger due to the increased number of dwelling units. Operational emissions would also be incrementally higher under this Alternative due to the increased number of dwelling units. Even though the quantity of construction and operational emissions would incrementally increase, this increase would be nominal and emissions would remain less than the SCAQMD daily significance thresholds. Impacts associated with regional emissions, criteria pollutants, exposure to sensitive receptors, and other emissions such as odors would be slightly increased in comparison to the proposed Project. However, air quality impacts from Alternative 2, Maximum Development Density Identified in the General Plan, would be less than significant and no mitigation is required, in the same manner as the proposed Project.

6.6.2.3 Biological Resources

As described in Section 4.3, *Biological Resources*, the proposed Project would produce a less than significant impact regarding sensitive species, riparian or other sensitive habitats, jurisdictional waters/wetlands, adopted policies and/or ordinances, and adopted habitat conservation plans. Impacts to wildlife movement and migratory species were determined to be less than significant considering the proposed 2.2 acres of open space (**PDF BIO-1**) and with implementation of mitigation (**MM BIO-1**) regarding protection of nesting birds. Alternative 2 would result in more dwelling units, in a denser format, but within the same development footprint on the Project site. The potential direct impacts to sensitive species, riparian or other sensitive habitats, jurisdictional waters/wetlands, adopted policies and/or ordinances, and adopted habitat conservation plans under Alternative 2 would be less than significant and no mitigation required, in the same manner as the proposed Project. Impacts to wildlife movement and migratory species would be less than significant, considering the same 2.2 acres of open space would be created and with implementation of nesting bird protection mitigation (**MM BIO-1**), in the same way as the proposed Project.

6.6.2.4 Energy

As discussed in Section 4.5, *Energy*, the proposed Project would produce a less than significant impact regarding consumption of energy during Project construction, Project operations, and conflicts with renewable energy or energy efficiency plans. Alternative 2 would result in a denser development with incrementally more dwelling units within the same footprint on the Project site, and a slightly increased demand for energy would occur. Similar to the proposed Project, Alternative 2 would comply with applicable Title 24 and other CBC standards regarding energy efficiency and would not result in wasteful, inefficient, unnecessary use of energy, conflicts with energy standards and regulations, or excessive energy demand that would tax local or regional supplies. Impacts regarding energy conservation resulting from Alternative 2, Maximum Development Density Identified in the General Plan, would be less than significant and no mitigation required, the same as for the proposed Project.

6.6.2.5 Geology and Soils

As described in Section 4.6, *Geology and Soils*, the proposed Project would subdivide the parcel to create a buildable area, Lot 1, and Lot A. Since Lot A is a lettered lot on the tentative tract map and no residential development is allowed on lettered lots, no residential development would occur on the remediated hillside (**PDF GEO-1**). Additionally, the proposed Project would include a mechanically stabilized earth (MSE) wall along the western border of the buildable space to create the building pad within Lot 1. The Project would produce a less than significant impact regarding seismic-related ground failure, fault rupture, rockfalls, soil erosion or loss of topsoil, unstable soils, and septic tanks. Furthermore, impacts regarding landslides and seismic-related ground shaking, expansive soils, slope stability, and paleontological were determined to be less than significant with implementation of project design features PDF GEO-2 and GEO-3 and mitigation measure MM GEO-1 pertaining to recovery of paleontological resources. Alternative 2 would result in development on the Project site contained within Lot 1 in the same manner as the proposed Project, with more dwelling units due to a higher vertical design to achieve maximum density. The potential direct impacts regarding geology and soils would also occur under Alternative 2, Maximum Development Density Identified in the General Plan, and the same project design features would be included and same mitigation measures would be required. Impacts to geology and soils under this Alternative would be less than significant with mitigation, in the same way as the proposed Project.

6.6.2.6 Hazards and Hazardous Materials

As discussed in Section 4.8, *Hazards and Hazardous Materials*, the proposed Project would produce a less than significant impact regarding: routine transport, use, or disposal of hazardous materials; emitting hazards near existing or proposed school; and conflicts with emergency response plans. Impacts regarding reasonably foreseeable upset and accident conditions, hazardous materials, location within an airport land use plan or within two miles of a public airport, and proximity to a private airport were determined to be less than significant. Impacts regarding

wildland fire risk is rendered less than significant with the OCFA approval of a Fire Management Plan, which includes installation of a fuel modification zone (**PDF HAZ-1**) and radiant heat walls (**PDF HAZ-2**). Alternative 2 would construct 41 dwelling units within the same developable area, therefore it is unlikely revisions to the Fire Master Plan and Fuel Modification Plans would be necessary to accommodate this alternative. If changes were necessary, such features would be reviewed as part OCFA's Fire Management Plan approval process to render wildfire risk impacts to less than significant. Alternative 2, Maximum Development Density Identified in the General Plan, would result in a less than significant impact regarding hazards and no mitigation is required, in the same way as the proposed Project.

6.6.2.7 Hydrology and Water Quality

As discussed in Section 4.9, *Hydrology and Water Quality*, the proposed Project would produce a less than significant impact regarding: water quality standards or waste discharge requirements; groundwater; alter drainage resulting in erosion or siltation offsite; alter drainage or increase of surface runoff resulting in flooding on- or off-site; runoff exceeding capacity of existing or planned facilities; otherwise degrade water quality; place housing in flood hazard areas; place structures that impede or redirect flood flows; dam inundation impacts; and inundation by seiche, tsunami, or mudflow. Because the proposed project design features would result in relocation and installation of a permanent storm drain system (**PDF HYD-1**) including an oversized 200-foot-long storm drainpipe to detain storm flows (see **PDF HYD-2**), installation of two catch basins, installation of a v-ditch atop the MSE wall, and installation of two modular wetland systems (MWS) (**PDF HYD-3**), hydrology and water quality impacts would be rendered less than significant and no mitigation required. Under Alternative 2, Maximum Development Density Identified in the General Plan, there would be increased development within the same developable area. Similar project design features would be included and applicable to handle hydrology concerns and protect water quality. As a result, impacts associated with hydrology and water quality would be less than significant under this Alternative with no mitigation required, the same as for the proposed Project.

6.6.2.8 Land Use and Planning

As discussed in Section 4.10, *Land Use and Planning*, the proposed Project would subdivide the site into two lots, Lot 1 and Lot A. Lot 1 would form a 2-acre developable area for the proposed residential structures and Lot A would form a 2.2-acre area for open space. These project design features (**PDF LU-1**) would limit development to Lot 1 which is the flatter, lower portion of the site adjacent to Crown Valley Parkway. **PDF LU-1** would also prohibit construction of residential units on Lot A by creating a lettered lot on the subdivision map, which does not permit residential development. As discussed in Section 4.10, the proposed Project would produce a less than significant impact regarding: dividing an established community; conflicts with applicable land use plans, policies, or regulations; and conflict with any applicable habitat or natural community conservation plan. Under Alternative 2, Maximum Development Density Identified in the General

Plan, development on the site would be permitted by the General Plan at a denser level. This alternative would include the same project design feature **PDF LU-1**, limiting development to Lot 1. Impacts under this Alternative associated with land use and planning would be less than significant and no mitigation is required, the same as for the proposed Project.

6.6.2.9 Noise

As discussed in Section 4.11, *Noise*, the proposed Project would produce a less than significant impact regarding construction noise, operational noise, operational groundborne vibration, substantial permanent increase in operational noise, and exposure to excessive public or private airport noise. Alternative 2, Maximum Development Density Identified in the General Plan, would result in a denser development on the Project site within the same developable area. As a result, similar impacts would be produced during the grading phase of construction. Impacts under this Alternative associated with noise and vibration would be less than significant and no mitigation is required, the same as for the proposed Project.

6.6.2.10 Recreation

As discussed in Section 3.2.5, *Recreation*, the proposed Project would produce a less than significant impact regarding new or renovated recreational and park facilities. The proposed Project includes sufficient open space and active recreational areas to satisfy the Project's local park code requirements. The construction of open space and active recreation facilities would occur on site and the potential impacts of constructing such facilities would be less than significant as they are to be built and approved per code. Alternative 2, Maximum Development Density Identified in the General Plan, would result in a denser development on the Project site and therefore additional recreation demand. This Alternative is assumed to include open space and active recreational areas on site to satisfy the local park code requirements in the same manner as the Project to account for the increased demand on parks. However, while not a fully engineered alternative, it appears this alternative may also not meet the City's open space and recreation requirements, resulting in the need for Alternative Development Standards. As a result, impacts regarding recreation would be less than significant and no mitigation required, which is the same as for proposed Project.

6.6.2.11 Transportation/Traffic

As described in Section 4.12, *Transportation/Traffic*, the proposed Project would generate 161 daily trips during the weekday and is considered to be a small project as the proposed Project generates less than 500 vehicle trips per day and screened from requiring detailed VMT Analysis. As a result of these trip estimates, the proposed Project would produce a less than significant impact related to a conflict with applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system or related to a conflict with CEQA Guidelines 15064.3. The proposed Project's impacts regarding dangerous design features would be reduced to less than significant with implementation of mitigation measures to enact a

Construction Management Plan (**MM TRA-1**), restrict outbound left turns (**MM TRA-2**), and modify the inbound left turn lane on Crown Valley Parkway to safely accommodate Project traffic (**MM TRA-3**). Alternative 2, Maximum Development Density Identified in the General Plan, would result in a denser development design on the Project site approximately doubling in the dwelling unit count from 22 to 41. The trip generation estimate for Alternative 2 would be approximately double that of the proposed Project (320 trips per day), and the Alternative would also be considered a small project and screened from detailed VMT analyses. Similar to the proposed Project, traffic impacts regarding dangerous design features would be fully mitigated by implementation of the mitigation measures identified in Section 4.12 (**MM TRA-1**, **MM TRA-2**, **MM TRA-3**). Although trip generation would increase under this Alternative, impacts would remain less than significant with implementation of mitigation, in the same way as the Project.

6.6.2.12 Wildfire

As discussed in Section 4.14, Wildfire, the proposed Project is within a VHFHSZ. The Project's Fire Management Plan has been reviewed and approved by the OCFA, including a Conceptual Fuel Modification Plan. Construction of the Project in accordance with the Fire Management Plan and Conceptual Fuel Modification Plan results in a less than significant impact regarding: impairment of an adopted emergency response or evacuation plan; exposure of occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire; installation or maintenance of associated infrastructure that may exacerbate fire risk or may result in temporary or ongoing impacts to the environment; and 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. Project design features for the proposed Project include 6-foot-high radiant heat walls (PDF FIRE-1), low profile venting (PDF FIRE-2), and an enhanced fire sprinkler system (PDF FIRE-3). Alternative 2, Maximum Development Density Identified in the General Plan, would occur on the same site and therefore in a VHFHSZ. Alternative 2's development plans would go through the same Fire Management Plan approval by OCFA. The Fire Management Plan would include a similar Fuel Modification Plan, and similar project design features (PDF FIRE-1, PDF FIRE-2, and PDF FIRE-3) to address risks associated with wildfire. Similar to the proposed Project, wildfire resources under Alternative 2, Maximum Development Density Identified in the General Plan, would not result in the need for new or expanded infrastructure or the construction of which would produce a significant impact on the environment. However, OCFA approval may request alterations to plans and design features if substantial building design changes occur with this alternative. Impacts regarding wildfire under this Alternative would be less than significant, the same as for the proposed Project.

6.6.2.13 Project Objectives Conclusion

Under the Permitted by General Plan Alternative, the objectives regarding residential development would generally be met. As detailed in Table 6-2, the Permitted by General Plan Alternative would not meet the Project objectives to the same degree as the proposed Project.

Table 6-2. Comparison of Alternative 2: Maximum Development Identified in the General Plan to the Project Objectives

Project Objectives	Does the Alternative Meet the Project Objectives?
Provide new for-sale housing that is responsive to market conditions and provides a uniquely designed product type that is currently limited elsewhere in the City.	Yes, to a similar degree ¹
Design the grading and geotechnical stabilization to ensure site stability consistent with City codes and minimize grading into the existing previously stabilized landslide mass.	Yes, to a similar degree
Design the grading and geotechnical stabilization to minimize off-site grading and balance the earthwork on site to minimize import/export, which would reduce air quality, noise, and traffic impacts from truck traffic on adjacent residential uses and City roadways.	Yes, to a similar degree
Redevelop the previously existing residential site with a residential project consistent with existing General Plan and Zoning designations that provides an updated housing product to meet the City's growing population and further address the City's and state's housing needs.	Yes, to a similar degree
Create a financially successful development that is fiscally responsible by equitably contributing to the expansion and operation of the public services and facilities impacted by the project through the payment of fees.	Yes, to a similar degree
Improve the aesthetic character along Crown Valley Parkway through enhanced landscaping consistent with General Plan policies.	Yes, to a similar degree

6.6.3 Alternative 3: Reduced Density

The Reduced Density Alternative would construct 8 duplex structures, 16 dwelling units, on the 4.2-acre site. In the same way as the Project, Alternative 3 would subdivide the parcel to create the same 2-acre buildable parcel (Lot 1) and 2.2-acre open space area (Lot A).

¹ The Applicant has indicated this alternative would consist of rental units, however for-sale units also appear feasible, therefore, this alternative is considered to meet the first objective.

6.6.3.1 Aesthetics

As discussed in Section 4.1, *Aesthetics*, the proposed Project includes project design features **PDF AES-1** through **AES-4**. The Project would result in a less than significant impact regarding scenic vistas, scenic resources within State scenic highways, compliance with applicable scenic quality zoning and regulations, and light and glare. Alternative 3 would result in less development on the Project site but within the same lower, flatter, eastern portion of the site covered by proposed Lot 1. This Alternative would contain the same or similar project design features as those identified by **PDF AES-1** through **AES-4** for the proposed Project regarding open space (proposed Lot A), architecture design elements, vegetation and landscaping, and lighting. Impacts to aesthetics resulting from Alternative 3, Reduced Density, would be less than significant and no mitigation is required, in the same manner as the proposed Project.

6.6.3.2 Air Quality

As discussed in Section 4.2, *Air Quality*, the proposed Project would not conflict with or obstruct implementation of the applicable air quality plan, violate any air quality standards, result in cumulatively considerable net increase in any criteria pollutant, expose sensitive receptors to substantial pollutant concentrations, or create objectionable odors. Construction of the proposed Project would comply with applicable rules and regulations reducing air pollution emissions including SCAQMD Rule 402, 403 and 1113 prohibiting air discharge nuisance, reduce dust emissions during earthmoving activities, and reduce VOC remissions from the application of architectural coatings. The Project would generate short-term construction and long-term operational emissions at levels below applicable air quality standards. Development of Alternative 3 would result in slightly less development on the Project site, however the development footprint contained within Lot 1 would be similar to the proposed Project and generate the same level of short-term construction emissions as the proposed Project. Daily construction emissions for any given increment of development would be the same or only incrementally smaller due to the decreased number of dwelling units. Operational emissions would also be incrementally lower under this Alternative due to the decreased number of dwelling units. Even though the quantity of construction and operational emissions would incrementally decrease, this decrease would be nominal, and emissions would be less than the SCAQMD daily significance thresholds. Impacts associated with regional emissions, criteria pollutants, exposure to sensitive receptors, and other emissions such as odors would also slightly decrease in comparison to the proposed Project from the reduction in the number of units. Air quality impacts from Alternative 3, Reduced Density, would be less than significant and no mitigation is required, in the same manner as the proposed Project.

6.6.3.3 Biological Resources

As described in Section 4.3, *Biological Resources*, the proposed Project would produce a less than significant impact regarding sensitive species, riparian or other sensitive habitats, jurisdictional waters/wetlands, adopted policies and/or ordinances, and adopted habitat conservation plans.

Impacts to wildlife movement and migratory species were determined to be less than significant considering the proposed 2.2 acres of open space (**PDF BIO-1**) and implementation of mitigation (**MM BIO-1**) regarding protection of nesting birds. Alternative 3 would result in less dwelling units, in a similar format, and within the same development footprint on the Project site. The potential direct impacts to sensitive species, riparian or other sensitive habitats, jurisdictional waters/wetlands, adopted policies and/or ordinances, and adopted habitat conservation plans under Alternative 3 would be less than significant and no mitigation required, in the same manner as the proposed Project. Impacts to wildlife movement and migratory species would be less than significant considering the creation of the same 2.2 acres of open space and with implementation of nesting bird protection mitigation (**MM BIO-1**), in the same way as the proposed Project.

6.6.3.4 Energy

As discussed in Section 4.5, *Energy*, the proposed Project would produce a less than significant impact regarding consumption of energy during Project construction, Project operations, and conflicts with renewable energy or energy efficiency plans. Alternative 3 would result in a less dense development with incrementally fewer dwelling units within the same footprint on the Project site, and a slightly decreased demand for energy would occur. Similar to the proposed Project, Alternative 3 would comply with applicable Title 24 and other CBC standards regarding energy efficiency and would not result in wasteful, inefficient, unnecessary use of energy, conflicts with energy standards and regulations, or excessive energy demand that would tax local or regional supplies. Impacts regarding energy conservation resulting from Alternative 3, Reduced Density, would be less than significant and no mitigation is required, the same as for the proposed Project.

6.6.3.5 Geology and Soils

As described in Section 4.6, *Geology and Soils*, the proposed Project would subdivide the parcel to create a buildable area (Lot 1) and to create an open space area (Lot A) to avoid development on previously remediated hillside (**PDF GEO-1**). Additionally, the proposed Project would include a mechanically stabilized earth (MSE) wall along the western border of the buildable space to create the building pad within Lot 1. These features would produce a less than significant impact regarding seismic-related ground failure, fault rupture, rockfalls, soil erosion or loss of topsoil, unstable soils, and septic tanks. Furthermore, impacts regarding landslides and seismic-related ground shaking, expansive soils, slope stability, and paleontological were determined to be less than significant with implementation of mitigation for soil testing during grading (**MM GEO-1**), inclinometer site monitoring (**MM GEO-2**), and paleontologist evaluation of resources if unearthed during grading (**MM GEO-3**). Alternative 3 would result in development on the Project site contained within Lot 1 in the same manner as the proposed Project with the assumption that the development footprint for Alternative 3 would be similar to the proposed Project even though Alternative 3 has fewer dwelling units. The potential direct impacts regarding geology and soils would also occur under Alternative 3, Reduced Density, and the same project design features would be included and mitigations would be required. Impacts to geology and soils under this

Alternative would be less than significant with implementation of mitigation, the same as the proposed Project.

6.6.3.6 Hazards and Hazardous Materials

As discussed in Section 4.8, *Hazards and Hazardous Materials*, the proposed Project would produce a less than significant impact regarding: routine transport, use, or disposal of hazardous materials; emitting hazards near existing or proposed school; and conflicts with emergency response plans. Impacts regarding reasonably foreseeable upset and accident conditions, hazardous materials, location within an airport land use plan or within two miles of a public airport, and proximity to a private airport were determined to be less than significant. Impacts regarding wildland fire risk is rendered less than significant with the OCFA approval of the Fire Management Plan, which includes installation of a fuel modification zone (**PDF HAZ-1**) and radiant heat walls (**PDF HAZ-2**). Alternative 3 would construct 16 dwelling units within a similar development footprint and would require similar fire attenuation features to reduce wildfire risks. However, such features would be reviewed as part OCFA's Fire Management Plan approval process to address wildfire risk. Alternative 3, Reduced Density, would result in a less than significant impact regarding hazards and no mitigation is required, in the same way as the proposed Project.

6.6.3.7 Hydrology and Water Quality

As discussed in Section 4.9, *Hydrology and Water Quality*, the proposed Project would produce a less than significant impact regarding: water quality standards or waste discharge requirements; groundwater; alter drainage resulting in erosion or siltation offsite; alter drainage or increase of surface runoff resulting in flooding on- or off-site; runoff exceeding capacity of existing or planned facilities; otherwise degrade water quality; place housing in flood hazard areas; place structures that impede or redirect flood flows; dam inundation impacts; and inundation by seiche, tsunami, or mudflow. Because the proposed project design features would result in relocation and installation of a permanent storm drain system (**PDF HYD-1**) including an oversized 200-foot-long storm drainpipe (to detain storm flows, see **PDF HYD-2**), installation of two catch basins, installation of a v-ditch atop the MSE wall, and installation of two modular wetland systems (MWS)(**PDF HYD-3**), hydrology and water quality impacts would be rendered less than significant and no mitigation required. Under Alternative 3, Reduced Density, there would be fewer dwelling units, however similar project design features would be included and applicable to handle hydrology concerns and protect water quality even though this alternative would have incrementally more pervious surface compared to the proposed Project. As a result, impacts associated with hydrology and water quality would be less than significant under this Alternative with no mitigation required, the same as for the proposed Project.

6.6.3.8 Land Use and Planning

As discussed in Section 4.10, *Land Use and Planning*, the proposed Project would subdivide the site into two lots, Lot 1 and Lot A. Lot 1 would form a 2-acre developable area for the proposed

residential structures and Lot A would form a 2.2-acre area for open space. These project design features (**PDF LU-1**) would limit development to Lot 1 which is the flatter, lower portion of the site adjacent to Crown Valley Parkway. **PDF LU-1** would also prohibit future development on Lot A by creating a lettered lot on the subdivision map, which does not permit residential development, avoiding development on the remediated hillside. As discussed in Section 4.10, the proposed Project would produce a less than significant impact regarding: dividing an established community; conflicts with applicable land use plans, policies, or regulations; and conflict with any applicable habitat or natural community conservation plan. Under Alternative 3, Reduced Density, development on the site would be permitted by the General Plan at a less dense level by converting the proposed Project's six triplex structures into duplexes, resulting in a reduction in dwelling units from 22 to 16. This alternative would include the same project design feature **PDF LU-1**, limiting development to Lot 1 and prohibiting residential home construction on the remediated hillside (Lot A). Impacts under this Alternative associated with land use and planning would be less than significant and no mitigation is required, the same as for the proposed Project.

6.6.3.9 Noise

As discussed in Section 4.11, *Noise*, the proposed Project would produce a less than significant impact regarding construction noise, operational noise, operational groundborne vibration, substantial permanent increase in operational noise, and exposure to excessive public or private airport noise. Alternative 3, Reduced Density, would result in a less dense development on the Project site, however similar construction activities would be necessary to create a similar sized building pad, resulting in similar construction noise impacts. As a result, similar impacts would be perceived during the grading phase of construction. Impacts under this Alternative associated with noise and vibration would be less than significant and no mitigation is required, the same as for the proposed Project.

6.6.3.10 Recreation

As discussed in Section 3.2.5, *Recreation*, the proposed Project would produce a less than significant impact regarding the need for new or renovated recreational and park facilities. The proposed Project includes sufficient open space and active recreational areas to satisfy the Project's local park code requirements. The construction of open space and active recreation facilities would occur on site and the potential impacts of constructing such facilities would be less than significant as they are to be built and approved per code. Alternative 3, Reduced Density, would result in a less dense development on the Project site. The Alternative would include open space and active recreational areas on site to satisfy the local park code requirements in the same manner as the Project although the demand on public parks would be incrementally less than the proposed Project. As a result, impacts regarding recreation would be less than significant and no mitigation required, the same as for proposed Project.

6.6.3.11 Transportation/Traffic

As described in Section 4.12, *Transportation/Traffic*, the proposed Project would generate 161 daily trips during the weekday and is considered to be a small project as the proposed Project generates less than 500 vehicle trips per day and is screened from requiring detailed VMT Analysis. As a result, the proposed Project would produce a less than significant impact related to a conflict with applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system or related to a conflict with CEQA Guidelines 15064.3. The proposed Project's impacts regarding dangerous design features would be reduced to less than significant with implementation of mitigation measures to enact a Construction Management Plan (**MM TRA-1**), restrict outbound left turns (**MM TRA-2**), and modify the inbound left turn lane on Crown Valley Parkway to safely accommodate Project traffic (**MM TRA-3**). Alternative 3, Reduced Density, would result in less development on the Project site, reducing the dwelling unit count from 22 to 16. The trip generation estimate for Alternative 3 would be approximately 70% of the proposed Project (110 trips per day), and the Alternative would also be considered a small project and screened from detailed VMT analyses. Similar to the proposed Project, traffic impacts regarding dangerous design features would be fully mitigated by implementation of the mitigation measures identified in Section 4.12 (**MM TRA-1**, **MM TRA-2**, and **MM TRA-3**). Impacts under this Alternative would remain less than significant with implementation of mitigation, in the same manner as the Project.

6.6.3.12 Wildfire

As discussed in Section 4.14, *Wildfire*, the proposed Project is within a VHFHSZ. The Project's Fire Management Plan has been reviewed and approved by the OCFA, including a Conceptual Fuel Modification Plan. Construction of the Project in accordance with the Fire Management Plan and Conceptual Fuel Modification Plan results in a less than significant impact regarding: impairment of an adopted emergency response or evacuation plan; exposure of occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire; installation or maintenance of associated infrastructure that may exacerbate fire risk or may result in temporary or ongoing impacts to the environment; and 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. Project design features included in the proposed Project include 6-foot-high radiant heat walls (**PDF FIRE-1**), low profile venting (**PDF FIRE-2**), and an enhanced fire sprinkler system (**PDF FIRE-3**). Alternative 3, Reduced Density, would occur on the same site and therefore in a VHFHSZ. Alternative 3's development plans would go through the same Fire Management Plan approval by OCFA. The Fire Management Plan would include a similar Fuel Modification Plan, and similar project design features (**PDF FIRE-1**, **PDF FIRE-2**, **PDF FIRE-3**) would be included. Impacts from risks associated with wildfire are less than significant. Similar to the proposed Project, wildfire resources under Alternative 3 would not result in the need for new or expanded infrastructure or the construction of which would produce a

significant impact on the environment. Impacts regarding wildfire under this Alternative would be less than significant, the same as for the proposed Project.

6.6.3.13 Project Objectives Conclusion

Under the Reduced Density Alternative, the objectives regarding the development of a less dense residential development would generally be met. As detailed in Table 6-3, the Reduced Density Alternative would not meet the Project objectives to the same degree as the proposed Project.

Table 6-3. Comparison of Alternative 3: Reduced Density to the Project Objectives

Project Objectives	Does the Alternative Meet the Project Objectives?
Provide new for-sale housing that is responsive to market conditions and provides a uniquely designed product type that is currently limited elsewhere in the City.	Yes, but to a lesser degree
Design the grading and geotechnical stabilization to ensure site stability consistent with City codes and minimize grading into the existing previously stabilized landslide mass.	Yes, to a similar degree
Design the grading and geotechnical stabilization to minimize off-site grading and balance the earthwork on site to minimize import/export, which would reduce air quality, noise, and traffic impacts from truck traffic on adjacent residential uses and City roadways.	Yes, to a similar degree
Redevelop the previously existing residential site with a residential project consistent with existing General Plan and Zoning designations that provides an updated housing product to meet the City's growing population and further address the City's and state's housing needs.	Yes, but to a lesser degree
Create a financially successful development that is fiscally responsible by equitably contributing to the expansion and operation of the public services and facilities impacted by the project through the payment of fees.	No
Improve the aesthetic character along Crown Valley Parkway through enhanced landscaping consistent with General Plan policies.	Yes, to a similar degree

6.6.4 Alternative 4: Higher Density Larger Footprint 38 Units

The Higher Density Larger Footprint 38 Units Alternative provides 19 duplexes and 38 units over the entire 4.2-acre parcel. This alternative eliminates the open space proposed by the Project in order to spread out development over a larger footprint. The construction of 16 additional units would result in an increase of residents from 57 to 99. A detailed description of this alternative is provided above in 6.5.1, Alternative Descriptions.

6.6.4.1 Aesthetics

As discussed in Section 4.1, *Aesthetics*, the proposed Project includes project design features **PDF AES-1** through **AES-4**. The Project would result in a less than significant impact regarding scenic vistas, scenic resources within State scenic highways, compliance with applicable scenic quality zoning and regulations, and light and glare. Alternative 4 would result in more development spread out over a larger portion of the site, utilizing the western sloping portion in addition to the flatter eastern portion. This Alternative would contain similar project design features as those identified by **PDF AES-1** through **AES-4** for the proposed Project regarding architecture design elements, vegetation and landscaping, and lighting. However, Alternative 4 eliminates the proposed Projects two lot design, with one lot for development and the other lot for open space. As result, impacts to aesthetics and in particular visual quality of the site resulting from Alternative 4, Higher Density Larger Footprint 38 Units, would be increased slightly in comparison to the proposed Project. However, impacts would remain less than significant, and no mitigation is required in the same manner as the proposed Project.

6.6.4.2 Air Quality

As discussed in Section 4.2, *Air Quality*, the proposed Project would not conflict with or obstruct implementation of the applicable air quality plan, violate any air quality standards, result in cumulatively considerable net increase in any criteria pollutant, expose sensitive receptors to substantial pollutant concentrations, or create objectionable odors. Construction of the proposed Project would comply with applicable rules and regulations reducing air pollution emissions including SCAQMD Rule 402, 403 and 1113 prohibiting air discharge nuisance, reduce dust emissions during earthmoving activities, and reduce VOC remissions from the application of architectural coatings. The Project would generate short-term construction and long-term operational emissions at levels below applicable air quality standards. Development of Alternative 4 would result in more development across a larger portion of the Project site, generating incrementally higher short-term construction emissions in comparison to the proposed Project. Daily construction emissions for any given increment of development would be incrementally larger, or extend for a longer period of time, due to the increased number of dwelling units being constructed and the larger development footprint. Operational emissions would also be incrementally higher under Alternative 4 due to the increased number of dwelling units. Even though the quantity of construction and operational emissions would incrementally increase, this increase would be minor and emissions would be less than the SCAQMD daily significance thresholds. Impacts associated with regional emissions, criteria pollutants, exposure to sensitive receptors, and other emissions such as odors would be slightly increased in comparison to the proposed Project from the additional number of dwelling units. However, air quality impacts from Alternative 4, Higher Density Larger Footprint 38 Units, would be less than significant and no mitigation is required, in the same manner as the proposed Project.

6.6.4.3 Biological Resources

As described in Section 4.3, *Biological Resources*, the proposed Project would produce a less than significant impact regarding sensitive species, riparian or other sensitive habitats, jurisdictional waters/wetlands, adopted policies and/or ordinances, and adopted habitat conservation plans. Impacts to wildlife movement and migratory species were determined to be less than significant considering the proposed 2.2 acres of open space (**PDF BIO-1**) and with implementation of mitigation (**MM BIO-1**) regarding protection of nesting birds. Alternative 4, Higher Density Larger Footprint 38 Units, would result in more dwelling units on a larger development footprint on the Project site. Although the development footprint would expand into the 2.2 acres of open space proposed by the Project, the 2.2 acres of open space is not being set aside to preserve biological resources. The project site, including the 2.2 acres of open space, does not contain valuable or significant biological resources that require preservation. Therefore, this Alternative would not create new biological impacts by expanding the development footprint over a larger area on the Project site. Therefore, potential direct impacts to sensitive species, riparian or other sensitive habitats, jurisdictional waters/wetlands, adopted policies and/or ordinances, and adopted habitat conservation plans under Alternative 4 would be less than significant with implementation of nesting bird protection mitigation (**MM BIO-1**), in the same manner as the proposed Project.

6.6.4.4 Energy

As discussed in Section 4.5, *Energy*, the proposed Project would produce a less than significant impact regarding consumption of energy during Project construction, Project operations, and conflicts with renewable energy or energy efficiency plans. Alternative 4 would result in a larger dwelling unit count and development would occur on a larger portion of the 4.2-acre Project site, resulting in a slightly increased demand for energy. Similar to the proposed Project, Alternative 4 would comply with applicable Title 24 and other CBC standards regarding energy efficiency and would not result in wasteful, inefficient, unnecessary use of energy, conflicts with energy standards and regulations, or excessive energy demand that would tax local or regional supplies. Impacts regarding energy conservation resulting from Alternative 4, Higher Density Larger Footprint 38 Units, would be slightly increased in comparison to the Project; however, impacts would remain less than significant, and no mitigation is required, the same as for the proposed Project.

6.6.4.5 Geology and Soils

As described in Section 4.6, *Geology and Soils*, the proposed Project would subdivide the parcel to create a buildable area (Lot 1) and to create an open space area (Lot A) to avoid development on previously remediated hillside (**PDF GEO-1**). Additionally, the proposed Project would include a mechanically stabilized earth (MSE) wall along the western border of the buildable space to create the building pad within Lot 1. The Project has a less than significant impact regarding seismic-related ground failure, fault rupture, rockfalls, soil erosion or loss of topsoil, unstable soils, and septic tanks. Furthermore, impacts regarding landslides and seismic-related ground shaking, expansive soils, slope stability, and paleontological were determined to be less than significant

with implementation of mitigation for soil testing during grading (**MM GEO-1**), inclinometer site monitoring (**MM GEO-2**), and paleontologist evaluation of resources if unearthed during grading (**MM GEO-3**). Alternative 4, Higher Density Larger Footprint 38 Units, would result in development across a larger portion of the 4.2-acre site and including portions of the remediated landslide and buttress fill area. The larger footprint associated with this Alternative would introduce the potential for additional grading, retaining walls, and engineered slopes. However, increasing the development footprint and grading within the remediated landslide and buttress fill area would not create a new significant impact. The development footprint associated with this Alternative was the subject of prior geotechnical reports, which concluded development of this alternative was geotechnically feasible. These reports were peer reviewed by GMU Geotechnical, Inc. (GMU), the City's geotechnical consultant. GMU concluded that the findings and recommendations in these reports were consistent with industry accepted standards and provided their conditional approval. Design features and geotechnical recommendations may need to be altered and/or increased to a greater extent than the proposed Project; however, impacts would be less than significant with implementation of mitigation, the same as the proposed Project.

6.6.4.6 Hazards and Hazardous Materials

As discussed in Section 4.8, *Hazards and Hazardous Materials*, the proposed Project would produce a less than significant impact regarding: routine transport, use, or disposal of hazardous materials; emitting hazards near existing or proposed school; and conflicts with emergency response plans. Impacts regarding reasonably foreseeable upset and accident conditions, hazardous materials, location within an airport land use plan or within two miles of a public airport, and proximity to a private airport were determined to be less than significant. Impacts regarding wildland fire risk would be less than significant with the OCFA approval of the Fire Management Plan, which includes installation of a fuel modification zone (**PDF HAZ-1**) and radiant heat walls (**PDF HAZ-2**). Alternative 4 would develop more dwelling units on a larger footprint, and the expanded layout would require modifications to project design features **PDF HAZ-1** and **PDF HAZ-2**. However, such features would be reviewed as part OCFA's Fire Management Plan approval process resulting in less than significant wildfire risks. Impacts regarding hazards under Alternative 4 would be greater as compared to the proposed Project; however, impacts would be less than significant and no mitigation is required, in the same way as the proposed Project.

6.6.4.7 Hydrology and Water Quality

As discussed in Section 4.9, *Hydrology and Water Quality*, the proposed Project would produce a less than significant impact regarding: water quality standards or waste discharge requirements; groundwater; alter drainage resulting in erosion or siltation offsite; alter drainage or increase of surface runoff resulting in flooding on- or off-site; runoff exceeding capacity of existing or planned facilities; otherwise degrade water quality; place housing in flood hazard areas; place structures that impede or redirect flood flows; dam inundation impacts; and inundation by seiche, tsunami, or mudflow. Because the proposed project design features would result in relocation and

installation of a permanent storm drain system (**PDF HYD-1**) including an oversized 200-foot-long storm drainpipe to detain storm flows (**PDF HYD-2**), installation of two catch basins, installation of a v-ditch atop the MSE wall, and installation of two modular wetland systems (MWS)(**PDF HYD-3**), hydrology and water quality impacts would be rendered less than significant and no mitigation required. Under Alternative 4, Higher Density Larger Footprint 38 Units, there would be increased dwelling units and a larger development footprint. Because the upper western portion of the site would be developed, additional or revised project design features would need to be introduced to account for the changed hydrology and water quality conditions. However, similar project design features would handle hydrology concerns and protect water quality. As a result, impacts associated with hydrology and water quality would slightly increase; however, impacts would be less than significant and no mitigation required, the same as for the proposed Project.

6.6.4.8 Land Use and Planning

As discussed in Section 4.10, *Land Use and Planning*, the proposed Project would subdivide the site into two lots, Lot 1 and Lot A. Lot 1 would form a 2-acre developable area for the proposed residential structures and Lot A would form a 2.2-acre area for open space. These project design features (**PDF LU-1**) would limit development to Lot 1 which is the flatter, lower portion of the site adjacent to Crown Valley Parkway. **PDF LU-1** would also prohibit future development on Lot A by creating a lettered lot on the subdivision map, which does not permit residential development, avoiding development on the remediated hillside. As discussed in Section 4.10, the proposed Project would produce a less than significant impact regarding: dividing an established community; conflicts with applicable land use plans, policies, or regulations; and conflict with any applicable habitat or natural community conservation plan. Under Alternative 4, Higher Density Larger Footprint 38 Units, development on the site would be permitted in accordance with the LNGP and across a larger portion of the site. This alternative would remove the creation of the 2.2-acre open space area described as **PDF LU-1**. However, this Alternative would remain consistent with the City's General Plan and Zoning Code, resulting in less than significant impacts and no mitigation required, the same as for the proposed Project.

6.6.4.9 Noise

As discussed in Section 4.11, *Noise*, the proposed Project would produce a less than significant impact regarding construction noise, operational noise, operational groundborne vibration, substantial permanent increase in operational noise, and exposure to excessive public or private airport noise. Alternative 4, Higher Density Larger Footprint 38 Units, would result in an increase in dwelling units over a larger development footprint and closer to additional sensitive receptors (i.e., homes). As a result, noise impacts would be produced during the grading phase of construction exposing additional homes to short-term construction noises. As a result, greater impacts would be perceived during the grading phase of construction, however it is anticipated

impacts under this Alternative associated with noise and vibration would be less than significant and no mitigation is required, the same as for the proposed Project.

6.6.4.10 Recreation

As discussed in Section 3.2.5, *Recreation*, the proposed Project would produce a less than significant impact regarding new or renovated recreational and park facilities. The proposed Project includes sufficient open space and active recreational areas to satisfy the Project's local park code requirements. The construction of open space and active recreation facilities would occur on site and the potential impacts of constructing such facilities would be less than significant as they are to be built and approved per code. Alternative 4, Higher Density Larger Footprint 38 Units, would result in development with a larger footprint on the 4.2-acre Project site. This Alternative would be required to include incrementally more open space and/or recreational areas on site in compliance with City's Park Code requirements due to the increase in the number of dwelling units. As a result, impacts regarding recreation would be less than significant, the same as for proposed Project.

6.6.4.11 Transportation/Traffic

As described in Section 4.12, *Transportation/Traffic*, the proposed Project trip estimate is 161 daily trips during the weekday, which is considered to be a small project since the proposed Project generates less than 500 vehicle trips per day and is screened from requiring detailed VMT Analysis. As a result of the trip estimate, the proposed Project would produce a less than significant impact related to a conflict with applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system or related to a conflict with CEQA Guidelines 15064.3. The proposed Project's impacts regarding dangerous design features would be reduced to less than significant with implementation of mitigations to enact a Construction Management Plan (**MM TRA-1**), restrict outbound left turns (**MM TRA-2**), and modify the inbound left turn lane on Crown Valley Parkway to safely accommodate Project traffic (**MM TRA-3**). Alternative 4, Higher Density Larger Footprint 38 Units, would result in more dwelling units across a larger portion of the Project site. The trip generation estimate for Alternative 4 would be approximately 380 trips per day, which would also be considered a small project and screened from detailed VMT analysis. Similar to the proposed Project, traffic impacts regarding dangerous design features would be fully mitigated by implementation of the mitigation measures identified in Section 4.12 (**MM TRA-1**, **MM TRA-2**, **MM TRA-3**). Although trip generation would increase under this Alternative, impacts would remain less than significant with implementation of mitigation, in the same way as the Project.

6.6.4.12 Wildfire

As discussed in Section 4.14, *Wildfire*, the proposed Project is within a VHFHSZ. The Project's Fire Management Plan has been reviewed and approved by the OCFA, including a Conceptual Fuel Modification Plan. Construction of the Project in accordance with the Fire Management Plan

and Conceptual Fuel Modification Plan results in a less than significant impact regarding: impairment of an adopted emergency response or evacuation plan; exposure of occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire; installation or maintenance of associated infrastructure that may exacerbate fire risk or may result in temporary or ongoing impacts to the environment; and 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. Project design features included in the proposed Project include 6-foot-high radiant heat walls (**PDF FIRE-1**), low profile venting (**PDF FIRE-2**), and an enhanced fire sprinkler system (**PDF FIRE-3**). Alternative 4, Higher Density Larger Footprint 38 Units, would result in a development with a larger footprint over a larger portion of the 4.2-acre Project site, and therefore in a VHFHSZ. This Alternative's development plans would go through the same Fire Management Plan approval by OCFA. The Fire Management Plan would include a similar Fuel Modification Plan, and similar project design features (**PDF FIRE-1**, **PDF FIRE-2**, **PDF FIRE-3**). Impacts from risks associated with wildfire are less than significant. However, alterations to the fire attenuation project design features would be needed to account for the larger development footprint into the western portion of the site and different site plan layout. Similar to the proposed Project, wildfire resources under Alternative 4, Higher Density Larger Footprint 38 Units, would not result in the need for new or expanded infrastructure or the construction of which would produce a significant impact on the environment. Impacts regarding wildfire would be slightly increased due to the expanded footprint; however, impacts would be less than significant, and no mitigation required, the same as for the proposed Project.

6.6.4.13 Project Objectives Conclusion

Under the Higher Density Larger Footprint 38 Units alternative, the objectives regarding the development of a denser residential development creating a larger footprint would generally be met. As detailed in Table 6-4, the Higher Density Larger Footprint 38 Units alternative would not meet the Project objectives to the same degree as the proposed Project.

Table 6-4. Comparison of Alternative 4: Higher Density Larger Footprint 38 Units to the Project Objectives

Project Objectives	Does the Alternative Meet the Project Objectives?
Provide new for-sale housing that is responsive to market conditions and provides a uniquely designed product type that is currently limited elsewhere in the City.	Yes, but to a greater degree
Design the grading and geotechnical stabilization to ensure site stability consistent with City codes and minimize grading into the existing previously stabilized landslide mass.	Yes, to a similar degree

Project Objectives	Does the Alternative Meet the Project Objectives?
Design the grading and geotechnical stabilization to minimize off-site grading and balance the earthwork on site to minimize import/export, which would reduce air quality, noise, and traffic impacts from truck traffic on adjacent residential uses and City roadways.	Yes, but to a lesser degree
Redevelop the previously existing residential site with a residential project consistent with existing General Plan and Zoning designations that provides an updated housing product to meet the City’s growing population and further address the City’s and state’s housing needs.	Yes, but to a greater degree
Create a financially successful development that is fiscally responsible by equitably contributing to the expansion and operation of the public services and facilities impacted by the project through the payment of fees.	Yes
Improve the aesthetic character along Crown Valley Parkway through enhanced landscaping consistent with General Plan policies.	Yes

6.7 Comparison of Project Alternatives

The following sections evaluate and compare the impacts of the Alternatives to the proposed Project by each environmental topic presented in Sections 3.0 and 4.0 of this Draft EIR. Table 6-5 compares the impacts of the alternatives with those of the proposed Project and identifies whether the alternative results in (1) a reduction of the impact; (2) a greater impact than the Project; or (3) the same impact as the Project. It should be noted that the No Project Alternative has no impacts compared to the proposed Project representing existing onsite conditions and cannot be selected as the environmentally superior alternative. For these reasons it is not included in Table 6-5.

Table 6-5. Impact Comparison of Project Alternatives

Environmental Factor		Proposed Project	Maximum Development Density Identified in the General Plan Alternative 2	Reduced Density Alternative 3	Higher Density Larger Footprint 38 Unit Alternative 4
Impact Abbreviations NI: No Impact LTS: Less than Significant Impact LTS (MM): Less than Significant Impact with Mitigation SIG (MM): Significant Impact with Mitigation Project Alternatives = Compared with the proposed Project, no change in the quantity of impact or significance of the impact. = - Compared with the proposed Project, the volume or extent of the impact is reduced but the significance remains the same. = + Compared with the proposed Project, the volume or extent of the impact is increased but the significance remains the same. ➔ Compared with the proposed Project, the significance of the impact is increased. ⬅ Compared with the proposed Project, the significance of the impact is reduced. ⬅SIG Compared with the proposed Project, the volume or extent of the impact is reduced, yet still significant. ➔SIG Compared with the proposed Project, the volume or extent of the impact is increased and still significant.					
Aesthetics	Scenic Vistas	LTS	=	=-	=+
	Scenic Highways	NI	=	=	=
	Scenic Quality	LTS	=	=-	=+
	Light and Glare	LTS	=	=	=
	Cumulative	LTS	=	=	=
Agricultural and Forestry Resources	Conversion of Prime, Unique, or Statewide Important Farmland to Non-Agricultural Use	NI	=	=	=
	Conflict with Agricultural Zoning or Williamson Act	NI	=	=	=
	Conflict with Existing Forest Land Zoning or Cause Rezoning of Forest Land	NI	=	=	=

Environmental Factor		Proposed Project	Maximum Development Density Identified in the General Plan Alternative 2	Reduced Density Alternative 3	Higher Density Larger Footprint 38 Unit Alternative 4
	Conversion of Forest Land to Non-Forest Use	NI	=	=	=
	Other Changes that would Convert Farmland or Forest Land	NI	=	=	=
	Cumulative	NI	=	=	=
Air Quality	Conflict with or Obstruct an Air Quality Plan	LTS	=	=	=
	Result in Cumulatively Considerable Net Increase in any Criteria Pollutant	LTS	= +	= -	= +
	Expose Sensitive Receptors to Substantial Pollutant Concentrations	LTS	= +	= -	= +
	Create Objectionable Odors	LTS	= +	= -	= +
	Cumulative	LTS	= +	=	= +
Biological Resources	Candidate, Non-listed Sensitive, or Special-Status Species	NI	=	=	=
	Riparian Habitat or Other Sensitive Natural Communities	NI	=	=	=

Environmental Factor		Proposed Project	Maximum Development Density Identified in the General Plan Alternative 2	Reduced Density Alternative 3	Higher Density Larger Footprint 38 Unit Alternative 4
	Jurisdictional Waters/Wetlands	NI	=	=	=
	Wildlife Movement and Migratory Species	LTS (MM)	=	=	= +
	Adopted Policies and/or Ordinances	LTS	=	=	=
	Adopted Habitat Conservation Plans	NI	=	=	=
	Cumulative	LTS (MM)	=	=	=
Cultural Resources	Historic Resources	NI	=	=	=
	Archaeological Resources	LTS (MM)	=	=	= +
	Human Remains	LTS (MM)	=	=	= +
	Cumulative	LTS (MM)	=	=	=
Energy	Wasteful, Inefficient, or Unnecessary Consumption of Energy	LTS	= +	= -	= +
	Conflict with Renewable Energy or Energy Efficiency Plan	LTS	= +	= -	= +
	Cumulative	LTS	=	=	=
Geology and Soils	Alquist-Priolo Fault Rupture	LTS	=	=	=
	Ground Shaking	LTS	=	=	=

Environmental Factor		Proposed Project	Maximum Development Density Identified in the General Plan Alternative 2	Reduced Density Alternative 3	Higher Density Larger Footprint 38 Unit Alternative 4
	Seismic-Related Ground Failure	LTS	=	=	=
	Landslides	LTS	=	=	=
	Soil Erosion or Loss of Topsoil	LTS	=	=	=
	Unstable Soils	LTS	=	=	=
	Expansive Soils	LTS	=	=	=
	Inadequate Soils for Septic Tanks	LTS	=	=	=
	Destroy unique Paleontological Resource	LTS (MM)	=	= -	= +
	Cumulative	LTS (MM)	=	=	=
Greenhouse Gas Emissions	Greenhouse Gas Emissions	LTS	= +	= -	= +
	Conflict with Applicable Plan Policy, or Regulation	LTS	=	=	=
	Cumulative	LTS	=	=	=
Hazards and Hazardous Materials	Routine Transport, use, or Disposal of Hazardous Materials	LTS	= +	= -	= +
	Reasonably Foreseeable Upset and Accident Conditions	LTS	= +	= -	= +

Environmental Factor		Proposed Project	Maximum Development Density Identified in the General Plan Alternative 2	Reduced Density Alternative 3	Higher Density Larger Footprint 38 Unit Alternative 4
	Emissions or Hazardous Materials Near Existing or Proposed School	NI	=	=	=
	Located on a Listed Hazardous Materials Site	NI	=	=	=
	Within an Airport Land Use Plan or Within Two Miles of a Public Airport	NI	=	=	=
	Interfere with Emergency Response Plan	LTS	=	=	=
	Wildland Fire Risks	LTS	=	=	=
	Cumulative	LTS	=	=	=+
Hydrology and Water Quality	Violate Water Quality Standards or Waste Discharge Requirements	LTS	=	=	=+
	Decrease Groundwater Supplies	LTS	=	=	=
	Alter Drainage Resulting in Erosion or Siltation Offsite	LTS	=	=	=+
	Increase Surface Runoff Causing Flooding	LTS	=	=	=

Environmental Factor		Proposed Project	Maximum Development Density Identified in the General Plan Alternative 2	Reduced Density Alternative 3	Higher Density Larger Footprint 38 Unit Alternative 4
	Create Runoff Water Exceeding Storm Drain Capacity	LTS	=	=	=
	Impede or Redirect Flood Flows	LTS	=	=	=
	Inundation by Seiche, Tsunami, or Mudflow	NI	=	=	=
	Conflict with or Obstruct Water Quality Control or Sustainable Groundwater Management Plan	LTS	=	=	=
	Cumulative	LTS	=	=	=
Land Use and Planning	Physically Divide an Established Community	LTS	=	=	=
	Conflict with Applicable Land Use Plans, Policies, or Regulations	LTS	=	=	=
	Cumulative	LTS	=	=	=
Mineral Resources	Loss of Statewide or Regional Important Mineral Resources	NI	=	=	=
	Loss of Locally Important Mineral Resources	NI	=	=	=
	Cumulative	NI	=	=	=

Environmental Factor		Proposed Project	Maximum Development Density Identified in the General Plan Alternative 2	Reduced Density Alternative 3	Higher Density Larger Footprint 38 Unit Alternative 4
Noise	Generation of Construction Noise in Excess of Standards Established by the General Plan or Noise Ordinance	LTS	=	=	=+
	Generation of Operational Noise in Excess of Standards Established by the General Plan or Noise Ordinance	LTS	=	=	= +
	Groundborne Vibration or Noise	LTS	=	=	= +
	Exposure to Excessive Noise from Private or Public Airport	NI	=	=	=
	Cumulative	LTS	=	=	=
Population and Housing	Population Growth	NI	= +	= -	= +
	Displace People or Housing	NI	=	=	=
	Cumulative	NI	=	=	=
Public Services	Fire Protection Facilities	NI	=+	=-	=+
	Police Protection Facilities	NI	=+	=-	=+
	School Facilities	NI	=+	=-	=+
	Library Facilities	NI	=+	=-	=+
	Other Facilities	NI	=+	=-	=+

Environmental Factor		Proposed Project	Maximum Development Density Identified in the General Plan Alternative 2	Reduced Density Alternative 3	Higher Density Larger Footprint 38 Unit Alternative 4
	Cumulative	NI	=	=	=
Recreation	Existing Recreational and Park Facilities	NI	= +	=	= +
	New or Physically Altered Recreation and Park Facilities	NI	=	=	=
	Cumulative	NI	=	=	=
Transportation and Traffic	Conflict with Program, Plan, Ordinance, or Policy Addressing the Circulation System, Including Transit, Roadway, Bicycle and Pedestrian Facilities	LTS	=	=	=
	Conflict with CEQA Guidelines 15064.3, Subdivision (b)	LTS	=	=	=
	Hazard Due to Design Features or incompatible Uses	LTS (MM)	=	=	=
	Inadequate Emergency Access	LTS	=	=	=
	Cumulative	LTS (MM)	=	=	=
Tribal Cultural Resources	Substantial Adverse Change to Listed or Eligible Tribal Cultural Resources	LTS (MM)	=	=	=

Environmental Factor		Proposed Project	Maximum Development Density Identified in the General Plan Alternative 2	Reduced Density Alternative 3	Higher Density Larger Footprint 38 Unit Alternative 4
	Substantial Adverse Change to Lead Agency Defined Tribal Cultural Resources	LTS (MM)	=	=	=
	Cumulative	LTS (MM)	=	=	=
Utilities and Service Systems	Construction of New or Expanded Water, Wastewater Treatment or Storm Water Drainage, Electric Power, Natural Gas, or Telecommunications Facilities Causing Significant Environmental Effects	NI	=+	==	=+
	Sufficient Water Supplies	NI	=+	==	=+
	Wastewater Treatment Capacity	NI	=+	==	=+
	Generate Excess Solid Waste, Exceed Landfill Capacity, Impair Solid Waste Reduction Goals	NI	= +	==	= +
	Compliance with Solid Waste Regulations	NI	=	==	=
	Cumulative	NI	=	=	=

Environmental Factor		Proposed Project	Maximum Development Density Identified in the General Plan Alternative 2	Reduced Density Alternative 3	Higher Density Larger Footprint 38 Unit Alternative 4
Wildfire	Impair Adopted Emergency Response or Evacuation Plan	LTS	=	=	=
	Exacerbate Wildfire Risks and Expose Occupants to Pollutant Concentrations from a Wildfire or the Uncontrolled Spread of a Wildfire	LTS	=	=	=+
	Install or Maintain Infrastructure Exacerbating Fire Risk or Result in Temporary or Ongoing Impacts	LTS	=	=	=
	Expose People or Structures to Risks from Runoff, Post-fire Slope Instability, or Drainage Changes	LTS	=	=	=+
	Cumulative	LTS	=	=	=
Impact Comparison to Proposed Project		-	Greater Impact	Greater Impact	Greater Impact

6.8 Environmentally Superior Alternative

An EIR must identify the environmentally superior alternative to the proposed Project. As discussed above, the No Project/No Build Alternative would be environmentally superior to the proposed Project because all physical environmental impacts identified for Project would be avoided. However, according to the State CEQA Guidelines, if the environmentally superior

alternative is the No Project Alternative, the EIR shall identify an environmentally superior alternative among the other alternatives (Section 15126.6(c)).

An alternative deemed feasible, and a candidate for the environmentally superior alternative, must not create new or more severe impacts. Under the Rule of Reason, Section 15126.6(f) states, “The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the Project.”

As shown in Table 6-5, Alternatives 2 and 4 would incrementally cause greater impact than the proposed Project because of the increase in the number of dwelling units. While no new significant impacts would be caused, both Alternatives 2 and 4 would be incrementally more impactful. Conversely, Alternative 3 would incrementally reduce impacts as a result of fewer dwelling units. Alternative 3 would not eliminate significant impacts, because the Project does not cause significant impacts, but Alternative 3 would incrementally reduce impacts.

Alternative 2, Maximum Development Density Identified in the General Plan, would increase the number of dwelling units from 22 to 41 within the same 2-acre development area while maintaining the 2.2-acres of open space in the same way as the Project. While this alternative would meet all of the Project Objectives, this alternative would cause incrementally greater impacts than the proposed Project.

Alternative 3, Reduced Density, would decrease the number of dwelling units from 22 to 16 within same 2-acre development area while maintaining the 2.2-acres of open space in the same way as the Project. However, one Project Objective would not be met as follows:

- Create a financially successful development that is fiscally responsible by equitably contributing to the expansion and operation of the public services and facilities impacted by the project through the payment of fees.

Two Project Objectives would be met to a lesser degree as follows:

- Provide new for-sale housing that is responsive to market conditions and provides a uniquely designed product type that is currently limited elsewhere in the City.
- Redevelop the previously existing residential site with a residential project consistent with existing General Plan and Zoning designations that provides an updated housing product to meet the City’s growing population and further address the City’s and state’s housing needs.

Alternative 4, Higher Density Larger Footprint 38 Units, would increase the number of dwelling units from 22 to 38. This Alternative would expand the development footprint further uphill into

the western portion of the site. This Alternative would introduce new units in areas further uphill and near the prior landside area. The 2.2-acres of open space would be removed. Two of the Project Objectives would be met to a lesser degree as follows:

- Design the grading and geotechnical stabilization to ensure site stability consistent with City codes and minimize grading into the existing previously stabilized landslide mass.
- Design the grading and geotechnical stabilization to minimize off-site grading and balance the earthwork on site to minimize import/export, which would reduce air quality, noise, and traffic impacts from truck traffic on adjacent residential uses and City roadways.

Alternative 3, Reduced Density, would be considered the Environmentally Superior Alternative. This conclusion is reached because direct impacts to the site (i.e., biological, cultural, geology, hydrology/water quality, land use/planning, minerals, tribal cultural resources, wildfire) would be the same as the proposed Project while several impacts attributable to use of the site would be reduced in comparison to the proposed Project (i.e., aesthetics, air quality, energy, GHGs, hazards, noise, population/housing, public services, recreation, transportation, utilities).

However, the reduction in impacts would be minimal and this alternative would conflict with SB330, which restricts the adoption of land use or zoning amendments that would result in the reduction of allowed residential density or intensity of land uses compared to what is allowed under the regulations in effect on January 1, 2018. The Housing Accountability Act also prohibits an agency from disapproving a project or imposing conditions that the project be developed at a lower density if the project is consistent with applicable, objective general plan, zoning, and subdivision standards and criteria, absent specific, narrow findings. (Gov. Code 65589.5.).

The current land use regulations allow attached residential development up to 41 dwelling units for the 4.2-acre Project site. The Project's proposed 22 attached dwelling units are less than the maximum number of dwelling units and therefore, consistent with the General Plan limits. However, the proposed 22 units on 2 acres (i.e., Lot 1) provides the same density of development as the 41 units identified in the General Plan applied to the entire 4.2-acre site. Therefore, the proposed Project does not constitute a loss of density and does not conflict with SB 330. Alternative 2, which proposes 41 dwelling units, does so on 2 acres and not over the entire 4.2 acre site. Therefore, Alternative 2 doubles the density of development compared to what was previously developed under the General Plan. Since Alternative 3, the Reduced Density Alternative, would reduce the number of dwelling units compared to the proposed Project and reduce the density compared to the General Plan, even though this Alternative is the environmentally superior alternative, it would conflict with State's legislative policies to not reduce residential densities.

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