

7. Alternatives to the Proposed Project

7.1 INTRODUCTION

7.1.1 Purpose and Scope

The California Environmental Quality Act (CEQA) requires that an Environmental Impact Report (EIR) include a discussion of reasonable project alternatives that would “feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any significant effects of the project, and evaluate the comparative merits of the alternatives” (CEQA Guidelines Section 15126.6). This chapter identifies potential alternatives to the proposed project and evaluates them, as required by CEQA.

Key provisions of the CEQA Guidelines on alternatives (Section 15126.6[a] through [f]) are summarized below to explain the foundation and legal requirements for the alternatives analysis in the EIR.

- “The discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly” (15126.6[b]).
- “The specific alternative of ‘no project’ shall also be evaluated along with its impact” (15126.6[e][1]).
- “The no project analysis shall discuss the existing conditions at the time the Notice of Preparation (NOP) is published, and at the time the environmental analysis is commenced, as well as what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. If the environmentally superior alternative is the ‘no project’ alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives” (15126.6[e][2]).
- “The range of alternatives required in an EIR is governed by a ‘rule of reason’ that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project” (15126.6[f]).
- “Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent)” (15126.6[f][1]).

7. Alternatives to the Proposed Project

- “For alternative locations, “only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR” (15126.6[f][2][A]).
- “An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative” (15126.6[f][3]).

For each development alternative, this analysis:

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

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

7.1.2 Project Objectives

As described in Section 3.2, the following objectives have been established for the proposed project and will aid decision makers in their review of the project, the project alternatives, and associated environmental impacts:

- **Objective 1:** Be forward thinking and embrace sustainability, innovation, and technology to continually improve the City.
- **Objective 2:** Be well known throughout Southern California for its quality neighborhoods, unique community culture, exciting local and regional destinations, and diversity in economic opportunity.
- **Objective 3:** Cultivate a special sense and quality of place which sets Westminster apart from its neighboring cities.
- **Objective 4:** Promote distinct local and regional activity centers, districts, and cultural destinations—including a Downtown and Little Saigon—and places where community members can gather to participate in civic events and other special programs.
- **Objective 5:** Walkable streets, signage, architecture, landscaping, and neighborhoods contribute to Westminster’s unique identity.
- **Objective 6:** Maintain a strong community culture which celebrates Westminster’s history, diversity, and family-friendly atmosphere.

7. Alternatives to the Proposed Project

- **Objective 7:** Encourage residents to take pride in their homes and neighborhoods, and ensure they are well maintained, clean, safe, and supported by strong infrastructure and public services.
- **Objective 8:** Provide a variety of housing choices for people looking to call Westminster home, including first-time home buyers, families with children, empty-nesters, and retirees.
- **Objective 9:** Maintain an economy with a range of high-quality dining, hospitality, shopping, entertainment, and employment choices.
- **Objective 10:** Help encourage a strong business community that is invested in maintaining the positive image of Westminster, especially along its corridors and business districts.
- **Objective 11:** Provide people who live, work, and visit Westminster with convenient access to popular destinations throughout the region.
- **Objective 12:** Ensure that people of all ages and abilities within Westminster can safely and efficiently get around by walking, biking, or using public transit and the City's extensive network of trails.
- **Objective 13:** Encourage residents of all ages to be healthy and active, and ensure that they are well served by ample park facilities and recreation opportunities.

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

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

7.2.1 Alternative Development Areas

CEQA requires that the discussion of alternatives focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project. The key question and first step in the analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR (Guidelines Sec. 15126[5][B][1]). In general, any development of the size and type proposed by the project would have substantially the same impacts on air quality, land use and planning, noise, population and housing, public services, recreation, transportation and traffic and utilities and service systems. Without a site specific analysis, impacts on aesthetics, cultural resources, geology, hazards and hazardous materials, hydrology/water quality and cannot be evaluated. Furthermore, the proposed project is the General Plan Update for the City of Westminster. The project is necessarily limited to the City of Westminster and its sphere of influence (SOI), which is the community of Midway City, since the City does not have the authority to impose policies outside its boundaries. Therefore, no alternative sites were considered.

7. Alternatives to the Proposed Project

7.2.2 No-Growth Alternative

The City of Westminster is primarily built out and there are relatively few remaining vacant parcels. Consequently, the land use changes associated with the proposed project focus on select areas that have the potential for redevelopment.

CEQA requires that the discussion of alternatives focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project. Traffic impacts identified in Section 5.12, *Transportation and Traffic*, are primarily associated with cumulative growth identified in the Orange County Transportation Analysis Model (OCTAM). Even without the additional growth identified in the General Plan Update, the 8 freeway segments identified as failing under Impact 5.12-2 would continue to operate at a deficient level of service (LOS) because the impact is related to cumulative growth rather than the proposed project. Likewise, the significant impact identified for GHG emissions under Impact 5.4-2 would continue to occur because the state has set a goal to reduce emissions to 80 percent below 1990 levels, which requires substantial changes in the sources of energy and new technologies that are not yet available.

The No Growth Alternative is considered and rejected because growth is allowed under the current General Plan, and there is no way to limit development within the City to its current extent. The No Growth Alternative would not achieve the objectives established for the proposed project and would not be in compliance with the adopted housing element pursuant to state law. In addition, none the significant impacts identified above would be eliminated under this alternative. Therefore, the No Growth Alternative is eliminated from further consideration.

7.3 ALTERNATIVES SELECTED FOR FURTHER ANALYSIS

Based on the criteria listed in Section 7.1.1, the following three alternatives have been determined to represent a reasonable range of alternatives that have the potential to feasibly attain some of the basic objectives of the project but which may avoid or substantially lessen any of the significant effects of the project. These alternatives are analyzed in detail in the following sections.

- No Project/Current General Plan Alternative
- Focused Mixed-Use Alternative
- Reduced Mixed-Use Intensity Alternative

An EIR must identify an “environmentally superior” alternative, and where the No Project Alternative is identified as environmentally superior, the EIR is required to identify as environmentally superior an alternative from among the others evaluated. Each alternative’s environmental impacts are compared to the proposed project and determined to be environmentally superior, neutral, or inferior. However, only the impacts found significant and unavoidable are used in making the final determination of whether an alternative is environmentally superior or inferior to the proposed project. Impacts involving air quality, greenhouse gas emissions, noise, and traffic were found to be significant and unavoidable. Section 7.7 identifies the Environmentally Superior Alternative.

7. Alternatives to the Proposed Project

7.3.1 Alternatives Comparison

The following statistical analysis provides a summary of general socioeconomic buildout projections determined by the four land use alternatives, including the proposed project. It is important to note that these are not growth projections. That is, they do not anticipate what is likely to occur by a certain time horizon, but rather provide a buildout scenario that would only occur if all the areas of the City were to develop to the probable capacities yielded by the land use alternatives. The following statistics were developed as a tool to understand better the difference between the alternatives analyzed in the DEIR. Table 7-1 identifies City and SOI information regarding dwelling unit, population, and employment projections, and also provides the jobs-to-housing ratio for each of the alternatives.

Table 7-1 Build-out Statistical Summary

	Proposed Project	No Project/Current General Plan Alternative	Focused Mixed-Use Areas	Reduced Mixed-Use Intensity Alternative
Dwelling Units	36,484	32,181	35,411	33,414
Population	118,463	104,492	114,321	113,606
Employment	39,407	30,390	36,961	35,158
Jobs-to-Housing Ratio	1.08	0.94	1.04	1.05

7.4 NO PROJECT/CURRENT GENERAL PLAN ALTERNATIVE

Section 15126.6(e) of the CEQA Guidelines requires that an EIR evaluate and analyze the impacts of the “No-Project” Alternative. When the project is the revision of an existing land use or regulatory plan, policy, or ongoing operation, the no-project alternative is the continuation of the plan, policy, or operation into the future. Therefore, in the No Project/Current General Plan Alternative, the current land use plan shown in Figure 4-2, *Current General Plan Land Use*, would remain in effect. Buildout statistics for the proposed General Plan Update and the current General Plan are compared in Table 7-2.

Table 7-2 No Project / Current General Plan Buildout Compared to the Proposed General Plan

Resource	Proposed Project	No Project/Current General Plan Alternative	Change	Percent Change
Dwelling Units	36,484	32,181	-4,303	-12%
Population	118,463	104,492	-13,971	-12%
Employment	39,407	30,390	-9,017	-23%
Jobs-to-Housing Ratio	1.08	0.94	-	-

All proposed land use changes would not occur. Development in accordance with the 1996 General Plan would continue to occur, allowing for totals of 32,181 residential units, 104,492 people, and 30,390 jobs, resulting in a jobs-to-housing ratio of 0.94.

7. Alternatives to the Proposed Project

7.4.1 Aesthetics

In this alternative, the entire City would be developed under the current land use plan and would involve new development and redevelopment in similar areas as the proposed General Plan Update. The City's Municipal Code identifies development standards to ensure quality development in the City. Aesthetic impacts would be similar to the proposed project and would be less than significant.

7.4.2 Air Quality

This alternative would result in decrease in residential and nonresidential development. This alternative would result in slightly less vehicle miles traveled (VMT) and associated mobile-source emissions and slightly less construction emissions as the proposed project and associated short-term criteria air pollutant emissions. Implementation of the proposed project was found to have significant and unavoidable impacts to short- and long-term air quality. Like the proposed project, this alternative would cumulatively contribute to the SoCAB nonattainment designations and conflict with the air quality management plan (AQMP). In comparison to the proposed project, this alternative would have slightly less air quality impacts, but impacts would remain significant.

7.4.3 Cultural Resources

Portions of the City would be developed and/or redeveloped under this alternative, potentially disturbing archaeological and paleontological resources that may be below the surface. Potential impacts to the historic built environment would be the same as the proposed project. Impacts of this alternative to cultural resources would be similar to those of the proposed project and, like the proposed project, would be less than significant after incorporation of mitigation measures.

7.4.4 Greenhouse Gas Emissions

This alternative would have slightly less GHG emissions from stationary and mobile sources associated with new development compared to the proposed project since there would be a reduction in residential and nonresidential intensity. This alternative would result in less VMT and associated mobile-source emissions. This alternative would result in similar levels of construction as the proposed project. This alternative would result in slightly less GHG emissions and impacts. As identified previously, GHG emissions impacts under this alternative would continue to occur because the state has set a goal to reduce emissions to 80 percent below 1990 levels, which requires substantial changes in the sources of energy and new technologies that are not yet available. In comparison to the proposed project, this alternative would have less GHG emissions impacts and would be significant.

7.4.5 Hazards and Hazardous Materials

In both this alternative and the proposed General Plan Update, land uses throughout the City would be required to comply with existing state, federal, and county regulations governing use, storage, transport, and disposal of hazardous materials and hazardous wastes. Both alternatives have the potential to encounter contaminated soils during grading or result in the demolition of buildings with asbestos-containing materials

7. Alternatives to the Proposed Project

or lead. Therefore, hazards and hazardous materials impacts would be similar to the proposed project and would be less than significant after incorporation of mitigation measures.

7.4.6 Hydrology and Water Quality

Implementation of the No Project/Adopted General Plan Alternative would have similar hydrology and water quality impacts as the proposed project. Although both residential and nonresidential intensity would decrease under this alternative, similar alterations to drainage patterns and hydrological patterns would occur. Similar to the proposed project, runoff would be subject to National Pollutant Discharge Elimination System (NPDES) permit standards and provisions stipulated in the Stormwater Pollution Prevention Plan (SWPPP). Treatment would be employed to remove excess pollutants from runoff during the construction and operational phases of development. Policies that offer additional protection from water quality impairment would be adopted, and runoff would be expected to be treated to the maximum extent practicable. In terms of water quality, this alternative would have a less than significant impact, similar to the proposed project.

Similar to the project, the existing City and county storm drain systems are not anticipated to change. Individual projects would be subject to additional review in order to ensure that they do not exceed the capacity of the storm drain system. It is therefore expected that the net effect would be similar, and individual projects would not exceed the capacity of the storm drain system.

7.4.7 Land Use and Relevant Planning

California Government Code Sections 65300 et seq. require that cities and counties prepare and adopt general plans. This alternative would leave the current General Plan in place rather than updating it. Neither this alternative nor the proposed project would divide an established community. The benefits of providing additional mixed-use and development intensity opportunities in key focus areas would not occur. Although significant impacts would not result under this alternative, the General Plan Update increases residential intensity and mixed-use opportunities near high quality transit areas and corridors in order to align with the Southern California Association of Governments' regional policies for integrating land use and transportation. Nevertheless, under this alternative, no conflicts with adopted plans and policies would occur. Therefore, land use impacts would be slightly greater than the General Plan Update under this alternative but would remain less than significant.

7.4.8 Noise

In this alternative, construction and operational phase noise would be less than that generated by buildout of the proposed General Plan Update, because development intensity would be reduced. Traffic noise impacts of this alternative would also be reduced. Buildout of the proposed General Plan would have similar construction-related impacts, and construction-related noise and vibration would be significant.

7.4.9 Population and Housing

This alternative would result in less housing and employment than the proposed project at buildout. Buildout of this alternative would also be within regional growth projections. This alternative would not improve the

7. Alternatives to the Proposed Project

job-housing balance like the proposed project, which is currently housing-rich. On balance, population and housing impacts would be similar under this alternative and less than significant.

7.4.10 Public Services

This alternative would result in less residential development and associated population in the City, resulting in a reduction in demand for public services, including police, fire, libraries, schools, and associated staffing and facilities. Neither this alternative nor the proposed project would result in impacts to public services because additional staffing required and construction of new facilities would be funded through the additional revenue to the City's general fund generated by new development and/or by impact fees to schools pursuant to Senate Bill 50 (SB 50). Development and operation of new facilities may have an adverse physical effect on the environment, including impacts relating to air quality, noise, and traffic. Development of new service facilities and associated impacts are addressed throughout the EIR as part of the buildout analysis. Public service impacts would be slightly less compared to the proposed project but would be less than significant.

7.4.11 Recreation

Recreation impacts would be less under this alternative because this alternative would generate fewer residents and less demand for parks. The City's current parkland standard is 2.5 acres of parkland for every 1,000 residents and an additional 0.5 acre per 1,000 residents is required to be provided by a cooperative arrangement with the local school districts. Under the existing park standard, this alternative would generate a demand for 313 acres of parkland, and the City has 83 acres of parkland. Proposed General Plan policies to enhance existing parks and identify additional parkland space would not occur under this alternative. However, because the actual demand for parkland would decrease under this alternative, impacts are considered less compared to the proposed project, but would be less than significant.

7.4.12 Transportation and Traffic

This alternative would result in a decrease in residential and nonresidential development, resulting in a reduction in vehicle trips and VMT. Traffic impacts identified in Section 5.12, *Transportation and Traffic*, are primarily associated with cumulative growth identified in the OCTAM. Even without the additional growth identified in the General Plan, 8 intersections, 6 roadway segments, and 8 freeway mainline segments would operate at deficient LOS because the impact is related to cumulative growth rather than the proposed project (see Chapter 5.0, Cumulative (2035) No Project Conditions, of the TIA in Appendix I of this DEIR). Consequently, impacts would be slightly less than the proposed project, but would still be significant.

7.4.13 Utilities and Service Systems

This alternative would result in a reduction in residential and nonresident development. The City is primarily built out, and new development and redevelopment would be required to ensure sufficient water and wastewater capacity is in place to meet the needs of the development. Therefore, this alternative would have similar utility and service system impacts compared to the proposed General Plan Update, and impacts would be less than significant.

7. Alternatives to the Proposed Project

7.4.14 Conclusion

Impacts of this alternative would be similar to the proposed project for aesthetics, cultural resources, hazards and hazardous materials, hydrology and water quality, population and housing, and utilities and service systems. Impacts of this alternative would be slightly reduced compared to those of the proposed project for air quality, GHG emissions, noise, public services, recreation, and traffic. This alternative would slightly increase land use and planning impacts compared to those of the proposed project. This alternative would not reduce any significant and unavoidable impacts of the proposed project to less than significant.

This alternative would not provide a comprehensive update to the City’s General Plan consistent with California Government Code Sections 65300 et seq. This alternative would not revise the City’s General Plan pursuant to various state requirements for General Plans—for instance, Assembly Bill 1358, the Complete Streets Act of 2008. In addition, while this alternative would meet some of the objectives, it would not meet the project objectives to the same extent as the proposed project.

7.5 FOCUSED MIXED-USE AREAS

The Focused Mixed-Use Alternative was selected to reduce significant and unavoidable impacts related to air quality, noise, and traffic by reducing the areas of increased mixed-use intensity. This alternative would reduce development intensity at Westminster Mall and the Northwest District by replacing the proposed mixed-use designation at these locations with their current designations (regional commercial and planned development/medium density residential, respectively). This alternative results in less development intensity than the proposed project.

Buildout statistics for the proposed General Plan Update and the Focused Mixed-Use Areas are compared in Table 7-3.

Table 7-3 Focused Mixed-use Areas Alternative Compared to the Proposed General Plan

Resource	Proposed Project	Focused Mixed-Use Areas Alternative	Change	Percent Change
Dwelling Units	36,484	35,411	-1,073	-3%
Population	118,463	114,321	-4,142	-3%
Employment	39,407	36,961	-2,446	-6%
Jobs-to-Housing Ratio	1.08	1.04	-	-

7.5.1 Aesthetics

In this alternative, the City would be developed under the proposed land use plan except for two areas, the Westminster Mall and the Northwest District, which would be developed under the current land use plan. The Northwest District would continue to operate as mobile homes instead of transitioning to high-density mixed-use development. However, the transition under the proposed General Plan would require a master plan to ensure that the area was well integrated with nearby uses. Likewise, the Westminster Mall would

7. Alternatives to the Proposed Project

continue to operate instead of transitioning from traditional retail uses to a mix of housing, public spaces, and entertainment uses. The proposed project would have a beneficial aesthetic impact on this area because it would replace parking with new walkable public and semipublic spaces. Additionally, development would be required to comply with the City's Design Guidelines Manual, which would ensure that new development is designed to be context sensitive and visually compatible with surrounding land uses. Therefore, although this alternative would result in less physical land use changes in two areas, this alternative would not offer the aesthetic benefits of the proposed project associated with the new uses. However, aesthetic impacts would be less than significant.

7.5.2 Air Quality

This alternative would result in decrease in mixed use development in two areas. Therefore, there would be fewer vehicle trips and less associated mobile-source emissions. There would also be slightly less construction emissions and associated short-term criteria air pollutant emissions than the proposed project. Implementation of the proposed project was found to have significant and unavoidable impacts to short- and long-term air quality. Like the proposed project, this alternative would cumulatively contribute to the SoCAB nonattainment designations and conflict with the AQMP. In comparison to the proposed project, this alternative would have slightly less air quality impacts, but impacts would remain significant.

7.5.3 Cultural Resources

Portions of the City would be developed and/or redeveloped under this alternative, potentially disturbing archaeological and paleontological resources that may be below the surface. Potential impacts to the historic built environment could also occur under this alternative. Although land use changes would not occur in two areas of the City, redevelopment of these areas could continue to occur under the current General Plan. Therefore, impacts of this alternative to cultural resources would be similar to those of the proposed project and, like the proposed project, would be less than significant after incorporation of mitigation measures.

7.5.4 Greenhouse Gas Emissions

This alternative would have slightly less GHG emissions from stationary and mobile sources associated with new development compared to the proposed project since there would be a reduction in mixed-use intensity in two areas. This alternative would result in less overall VMT and associated mobile-source emissions. This alternative would result in similar levels of construction as the proposed project. This alternative would result in slightly less GHG emissions and impacts. As identified previously, GHG emissions impacts under this alternative would continue to occur because the state has set a goal to reduce emissions to 80 percent below 1990 levels, which requires substantial changes in the sources of energy and new technologies that are not yet available. In comparison to the proposed project, this alternative would have less GHG emissions impacts and would be significant.

7. Alternatives to the Proposed Project

7.5.5 Hazards and Hazardous Materials

In both this alternative and the proposed General Plan Update, land uses throughout the City would be required to comply with existing state, federal, and county regulations governing use, storage, transport, and disposal of hazardous materials and hazardous wastes. Both alternatives have the potential to encounter contaminated soils during grading or result in the demolition of buildings with asbestos-containing materials or lead. Therefore, hazards and hazardous materials impacts would be similar to the proposed project and would be less than significant after incorporation of mitigation measures.

7.5.6 Hydrology and Water Quality

Implementation of the Focused Mixed-Use Areas Alternative would have similar hydrology and water quality impacts as the proposed project. Although both residential and nonresidential intensity would decrease under this alternative, similar alterations to drainage patterns and hydrological patterns would occur. Similar to the proposed project, runoff would be subject to NPDES permit standards and provisions stipulated in the SWPPP. Treatment would be employed to remove excess pollutants from runoff during the construction and operational phases of development. Policies that offer additional protection from water quality impairment would be adopted, and runoff would be expected to be treated to the maximum extent practicable. In terms of water quality, this alternative would have a less than significant impact, similar to the proposed project.

Similar to the project, the existing City and county storm drain systems are not anticipated to change. Individual projects would be subject to additional review in order to ensure that they do not exceed the capacity of the storm drain system. It is therefore expected that the net effect would be similar, and individual projects would not exceed the capacity of the storm drain system.

7.5.7 Land Use and Relevant Planning

Land use impacts under this alternative would be similar to the proposed project. This alternative would not allow additional mixed use intensity in two focus areas. However, similar to the proposed project, this alternative would be consistent with regional and local plans and policies. Impacts would be similar to the proposed project and would remain less than significant.

7.5.8 Noise

In this alternative, construction and operational phase noise would be less than that generated by buildout of the proposed General Plan Update, because development intensity would be reduced. Traffic noise impacts of this alternative would also be reduced. Buildout of the proposed General Plan would have similar construction-related impacts and construction-related noise and vibration would be significant.

7.5.9 Population and Housing

This alternative would result in less housing and employment than the proposed project at buildout. Similar to the proposed project, buildout of this alternative would exceed regional growth projections. This

7. Alternatives to the Proposed Project

alternative would improve the jobs-housing balance, but not to the same degree as the project. On balance, population and housing impacts would be similar under this alternative and less than significant.

7.5.10 Public Services

This alternative would result in less residential development and associated population in the City, resulting in a reduction in demand for public services, including police, fire, libraries, schools, and associated staffing and facilities. Neither this alternative nor the proposed project would result in impacts to public services because additional staffing required and construction of new facilities would be funded through the additional revenue to the City's general fund generated by new development and/or by impact fees to schools pursuant to SB 50. Development and operation of new facilities may have an adverse physical effect on the environment, including impacts relating to air quality, noise, and traffic. Development of new service facilities and associated impacts are addressed throughout the EIR as part of the buildout analysis. Public service impacts would be slightly less compared to the proposed project but would be less than significant.

7.5.11 Recreation

Recreation impacts would be less under this alternative because this alternative would generate fewer residents and less demand for parks. The City's current parkland standard is 2.5 acres of parkland for every 1,000 residents and an additional 0.5 acre per 1,000 residents is required to be provided by a cooperative arrangement with the local school districts. Under the existing park standard, this alternative would generate a demand for 345 acres of parkland, and the City has 83 acres of parkland. Because the actual demand for parkland would decrease under this alternative, impacts are considered less compared to the proposed project and less than significant.

7.5.12 Transportation and Traffic

This alternative would result in a decrease in mixed use intensity, resulting in a reduction in vehicle trips near the Westminster Mall and Northwest District. Traffic impacts identified in Section 5.12, *Transportation and Traffic*, are primarily associated with cumulative growth identified in the OCTAM. Even without the additional growth identified in the General Plan, 8 intersections, 6 roadway segments, and 8 freeway mainline segments would operate at deficient LOS because the impact is related to cumulative growth rather than the proposed project (see Chapter 5.0, Cumulative (2035) No Project Conditions, of the TIA in Appendix I of this DEIR). Consequently, impacts would be slightly less than the proposed project, but would still be significant.

7.5.13 Utilities and Service Systems

This alternative would result in a reduction in mixed uses in two of the six focus areas. The City is primarily built out, and new development and redevelopment would be required to ensure sufficient water and wastewater capacity is in place to meet the needs of the development. Therefore, this alternative would have similar utility and service system impacts compared to the proposed General Plan Update, and impacts would be less than significant.

7. Alternatives to the Proposed Project

7.5.14 Conclusion

Impacts of this alternative would be similar to the proposed project for hazards and hazardous materials, hydrology and water quality, land use and planning, population and housing, and utilities and service systems. Impacts of this alternative would be slightly reduced compared to those of the proposed project for air quality, cultural resources, GHG emissions, noise, public services, recreation, and traffic. This alternative would slightly increase aesthetic impacts compared to those of the proposed project. This alternative would not reduce any significant and unavoidable impacts of the proposed project to less than significant. This alternative would meet most of the project objections but not to the same extent as the proposed project.

7.6 REDUCED MIXED-USE INTENSITY ALTERNATIVE

The Reduced Mixed-Use Intensity Alternative was selected to reduce significant and unavoidable impacts related to air quality, noise, and traffic. This alternative would reduce development intensity at all six proposed mixed-use areas by limiting the maximum density to 25 du/ac (consistent with the High Density Residential designation) and limiting nonresidential development intensity to a floor-area-ratio of 0.65 (consistent with the Regional Commercial designation). This alternative results in less development intensity than the proposed project.

Buildout statistics for the proposed General Plan Update and the Reduced Mixed-Use Intensity Alternative are compared in Table 7-4.

Table 7-4 Reduced Mixed-Use Intensity Alternative Compared to the Proposed General Plan

Resource	Proposed Project	Reduced Mixed-Use Intensity Alternative	Change	Percent Change
Dwelling Units	36,484	33,414	-3,070	-8%
Population	118,463	113,606	-4,857	-4%
Employment	39,407	35,158	-4,249	-11%
Jobs-to-Housing Ratio	1.08	1.05	-	-

7.6.1 Aesthetics

Under this alternative, the development area and areas of intensification would remain the same with a reduction in intensity in the mixed use areas. Therefore, the beneficial aesthetic impacts of development and redevelopment would be similar to the proposed project and less than significant.

7.6.2 Air Quality

This alternative would decrease mixed-use intensity in all of the six focus areas. Therefore, there would be fewer vehicle trips and less associated mobile-source emissions. There would also be slightly less construction emissions and associated short-term criteria air pollutant emissions than the proposed project. Implementation of the proposed project was found to have significant and unavoidable impacts to short- and

7. Alternatives to the Proposed Project

long-term air quality. Like the proposed project, this alternative would cumulatively contribute to the SoCAB nonattainment designations and conflict with the AQMP. In comparison to the proposed project, this alternative would have slightly less air quality impacts but impacts would remain significant.

7.6.3 Cultural Resources

Portions of the City would be developed and/or redeveloped under this alternative, potentially disturbing archaeological and paleontological resources that may be below the surface. Potential impacts to the historic built environment could also occur under this alternative. The development area under this alternative would be similar to the proposed project. Therefore, impacts of this alternative to cultural resources would be similar and less than significant after incorporation of mitigation measures.

7.6.4 Greenhouse Gas Emissions

This alternative would have slightly less GHG emissions from stationary and mobile sources associated with new development compared to the proposed project since there would be a reduction in mixed-use intensity in the six focus areas. This alternative would result in less overall VMT and associated mobile-source emissions. This alternative would result in similar levels of construction as the proposed project. This alternative would result in slightly less GHG emissions and impacts. As identified previously, GHG emissions impacts under this alternative would continue to occur because the state has set a goal to reduce emissions to 80 percent below 1990 levels, which requires substantial changes in the sources of energy and new technologies that are not yet available. In comparison to the proposed project, this alternative would have less GHG emissions impacts and would be significant.

7.6.5 Hazards and Hazardous Materials

In both this alternative and the proposed General Plan Update, land uses throughout the City would be required to comply with existing state, federal, and county regulations governing use, storage, transport, and disposal of hazardous materials and hazardous wastes. Both alternatives have the potential to encounter contaminated soils during grading or result in the demolition of buildings with asbestos-containing materials or lead. The development area under this alternative would be similar to the proposed project. Therefore, hazards and hazardous materials impacts would be similar to the proposed project and would be less than significant after incorporation of mitigation measures.

7.6.6 Hydrology and Water Quality

Implementation of the Reduced Mixed-Use Intensity Alternative would have similar hydrology and water quality impacts as the proposed project. Although both residential and nonresidential intensity would decrease under this alternative, similar alterations to drainage patterns and hydrological patterns would occur. Similar to the proposed project, runoff would be subject to NPDES permit standards and provisions stipulated in the SWPPP. Treatment would be employed to remove excess pollutants from runoff during the construction and operational phases of development. Policies that offer additional protection from water quality impairment would be adopted, and runoff would be expected to be treated to the maximum extent

7. Alternatives to the Proposed Project

practicable. In terms of water quality, this alternative would have a less than significant impact, similar to the proposed project.

Similar to the project, the existing City and county storm drain systems are not anticipated to change. Individual projects would be subject to additional review in order to ensure that they do not exceed the capacity of the storm drain system. It is therefore expected that the net effect would be similar, and individual projects would not exceed the capacity of the storm drain system

7.6.7 Land Use and Relevant Planning

Land use impacts under this alternative would be similar to the proposed project. This alternative would decrease mixed-use intensity in all of the six focus areas. However, similar to the proposed project, this alternative would be consistent with regional and local plans and policies. Impacts would be similar to the proposed project and would remain less than significant

7.6.8 Noise

In this alternative, construction and operational phase noise would be less than that generated by buildout of the proposed General Plan Update, because development intensity would be reduced. Traffic noise impacts of this alternative would also be reduced. Buildout of the proposed General Plan would have similar construction-related impacts, and construction-related noise and vibration would be significant.

7.6.9 Population and Housing

This alternative would result in less housing and employment than the proposed project at buildout. Similar to the proposed project, buildout of this alternative would exceed regional growth projections. This alternative would improve the jobs-housing balance, but not to the same degree as the project. On balance, population and housing impacts would be similar under this alternative and less than significant.

7.6.10 Public Services

This alternative would result in less residential development and associated population in the City, resulting in a reduction in demand for public services, including police, fire, libraries, schools, and associated staffing and facilities. Neither this alternative nor the proposed project would result in impacts to public services because additional staffing required and construction of new facilities would be funded through the additional revenue to the City's general fund generated by new development and/or by impact fees to schools pursuant to SB 50. Development and operation of new facilities may have an adverse physical effect on the environment, including impacts relating to air quality, noise, and traffic. Development of new service facilities and associated impacts are addressed throughout the EIR as part of the buildout analysis. Public service impacts would be slightly less compared to the proposed project but would be less than significant.

7. Alternatives to the Proposed Project

7.6.11 Recreation

Recreation impacts would be less under this alternative because this alternative would generate fewer residents and less demand for parks. The City's current parkland standard is 2.5 acres of parkland for every 1,000 residents and an additional 0.5 acre per 1,000 residents is required to be provided by a cooperative arrangement with the local school districts. Under the existing park standard, this alternative would generate a demand for 341 acres of parkland, and the City has 83 acres of parkland. Because the actual demand for parkland would decrease under this alternative, impacts are considered less compared to the proposed project and less than significant.

7.6.12 Transportation and Traffic

This alternative would result in a decrease in mixed use intensity, resulting in a reduction in vehicle trips in each of the focus areas. Traffic impacts identified in Section 5.12, *Transportation and Traffic*, are primarily associated with cumulative growth identified in the OCTAM. Even without the additional growth identified in the General Plan, 8 intersections, 6 roadway segments, and 8 freeway mainline segments would operate at deficient LOS because the impact is related to cumulative growth rather than the proposed project (see Chapter 5.0, Cumulative (2035) No Project Conditions, of the TIA in Appendix I of this DEIR). Consequently, impacts would be slightly less than the proposed project, but would still be significant.

7.6.13 Utilities and Service Systems

This alternative would result in a reduction in mixed-use intensity in the six focus areas. The City is primarily built out, and new development and redevelopment would be required to ensure sufficient water and wastewater capacity is in place to meet the needs of the development. Therefore, this alternative would have similar utility and service system impacts compared to the proposed General Plan Update, and impacts would be less than significant.

7.6.14 Conclusion

Impacts of this alternative would be similar to the proposed project for aesthetics, cultural resources, hazards and hazardous materials, hydrology and water quality, land use and planning, population and housing, and utilities and service systems. Impacts of this alternative would be slightly reduced compared to those of the proposed project for air quality, GHG emissions, noise, public services, recreation, and traffic. This alternative would not reduce any significant and unavoidable impacts of the proposed project to less than significant. This alternative would meet most of the project objections, although not to the same extent as the proposed project.

7. Alternatives to the Proposed Project

7.7 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires a lead agency to identify the “environmentally superior alternative” and, in cases where the “No Project” Alternative is environmentally superior to the proposed project, the environmentally superior development alternative must be identified. Table 7-5 shows comparison of impacts to the proposed project. One alternative has been identified as “environmentally superior” to the proposed project:

- Reduced Mixed-Use Intensity Alternative

The Reduced Mixed-Use Intensity Alternative has been identified as the environmentally superior alternative. This alternative would lessen impacts associated with air quality, GHG emissions, noise, public services, recreation, and traffic by approximately 8 percent. This alternative would have the greatest effect on reducing significant and unavoidable impacts related to these impacts, primarily due to the decrease in mixed-use intensity allowed. However, this alternative would not completely eliminate any of the significant unavoidable impacts. The remaining impacts are generally the same as the proposed project—aesthetics, cultural resources, hazards and hazardous materials, hydrology and water quality, land use and planning, population and housing, and utilities and service systems.

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

Table 7-5 Comparison of Alternatives to the Proposed Project

Environmental Resource Area	Project	No Project/Current General Plan Alternative	Focused Mixed-Use Areas	Reduced Mixed-Use Intensity Alternative
Aesthetics	LTS	0	+	0
Air Quality	S/U	-	-	-
Cultural Resources	LTSM	0	-	0
GHG Emissions	S/U	-	-	-
Hazards and Hazardous Materials	LTS	0	0	0
Hydrology and Water Quality	LTS	0	0	0
Land Use and Planning	LTS	+	0	0
Noise	S/U	-	-	-
Population and Housing	LTS	0	0	0
Public Services	LTS	-	-	-
Recreation	LTS	-	-	-
Transportation and Traffic	S/U	-	-	-
Utilities and Service Systems	LTS	0	0	0

LTS – Less Than Significant

LTSM – Less Than Significant with Mitigation

S/U – Significant and Unavoidable

(+) = Impact considered greater when compared with the proposed project.

(0) = Impact considered neutral when compared with the proposed project.

(-) = Impact considered less when compared with the proposed project.

7. Alternatives to the Proposed Project

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