

4.0 ALTERNATIVES TO THE PROPOSED PROJECT

4.1 INTRODUCTION

The purpose of an alternatives analysis pursuant to CEQA is to identify feasible options that would attain most of the basic objectives of a proposed project while reducing its significant effects. Provisions of CEQA Guidelines (Section 15126.6) that address the number of project alternatives required in an EIR state the following:

The range of alternatives required in an EIR is governed by a “rule of reason;” the EIR must evaluate only those alternatives necessary to permit a reasonable choice. The alternatives shall be limited to those that would avoid or substantially lessen any of the significant effects of a proposed project while meeting most of the underlying project objectives.

4.2 REQUIREMENTS FOR THE CONSIDERATION OF ALTERNATIVES

An important aspect of EIR preparation is the identification and assessment of alternatives to the proposed project that have the potential to avoid or substantially lessen potentially significant impacts. In addition to mandating consideration of the no project alternative, CEQA Guidelines (Section 15126.6(e)) emphasize the selection of a reasonable range of feasible alternatives and adequate assessment, which allows decision-makers to use a comparative analysis. CEQA Guidelines (Section 15126.6(a)) states:

An EIR shall describe a reasonable range of 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 and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation.

In accordance with CEQA Guidelines 15126.6, this EIR contains a comparative impact assessment of alternatives to the Project. The primary purpose of this assessment is to provide decision-makers and the public with a reasonable number of feasible Project alternatives that could attain most of the basic Project objectives while avoiding or reducing any of the Project’s significant adverse environmental effects. Important considerations for these alternatives’ analyses are provided below:

- An EIR need not consider every conceivable alternative to a project;
- An EIR should identify alternatives that were considered by the lead agency, but rejected as infeasible during the scoping process;
- Reasons for rejecting an alternative include:
 - Failure to meet most of the basic project objectives



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- Infeasibility
- Inability to avoid significant environmental effects

4.2.1 No Project Alternative

CEQA Guidelines require that the alternatives be compared to the project's environmental impacts and that the "no project" alternative be considered (CEQA Guidelines Section 15126.6(d)(e)). Section 15126.6(d)(e)(1) states:

The specific alternative of "no project" shall also be evaluated along with its impact. The purpose of describing and analyzing a no project alternative is to allow decision makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project. The no project alternative analysis is not the baseline for determining whether the proposed project's environmental impacts may be significant, unless it is identical to the existing environmental setting analysis which does establish that baseline.

The purpose of describing and analyzing a no project alternative is to allow decision-makers to compare the impacts of approving the Project with the impacts of not approving the Project.

4.2.2 Consistency with Project Objectives

A project's statement of objectives describes the purpose of the project and the reasons for undertaking the project. To be considered for detailed analysis in the EIR, an alternative must meet most of the project objectives. The following lists the basic objectives of the Project for purposes of screening potential alternatives:

- Protect and improve quality of life for current and future residents.
- Encourage new housing for households at all income levels and for households with a range of diverse housing needs.
- Amend land use standards and designations in the City's Zoning Code, Specific Plans, General Plan as needed to comply with state law and meet the required Regional Housing Needs Allocation.
- Remove undue constraints on new housing development, including for affordable housing development.
- Affirmatively further fair housing.

4.2.3 Feasibility

According to CEQA Guidelines (Section 15126.6(f)(1):

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



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plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site (or the site is already owned by the proponent). No one of these factors establishes a fixed limit on the scope of reasonable alternatives.

Based on CEQA Guidelines, “feasible” is defined as, “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors” (CEQA Guidelines Section 15364). CEQA does not require that an EIR determine the ultimate feasibility of a selected alternative, but rather that an alternative be potentially feasible.

For the screening analysis, the potential feasibility of potential alternatives was assessed using the following considerations:

- **Technological Feasibility:** Is the alternative feasible from a technical perspective, considering available technology? Are there any construction, operation, or maintenance constraints that cannot be overcome?
- **Legal Feasibility:** For example, do legal protections on lands or financing strategies preclude or substantially limit the feasibility of constructing the alternative?
- **Economic Feasibility:** Is the alternative so costly that its costs would prohibit its implementation?

In determining what alternatives should be considered in the EIR, it is important to acknowledge the objectives of the Project, the Project’s significant effects, and unique Project considerations. These factors are crucial to the development of alternatives that meet the criteria specified in Section 15126.6(a). Although, as noted above, an EIR must contain a discussion of “potentially feasible” alternatives, the ultimate determination whether an alternative is feasible or infeasible is made by the lead agency’s decision-making body (PRC Section 21081[a][3]).

4.3 METHODOLOGY AND SCREENING CRITERIA

A range of potential alternatives was developed and subjected to the screening criteria. Several representative alternatives were considered. There was no attempt to include every conceivable alternative. The following criteria were used to screen potential alternatives:

- Does the alternative meet most of the Project objectives?
- Is the alternative potentially feasible?
- Would the alternative substantially reduce one or more of the significant impacts associated with the Project?

The 167 dwelling units associated with the residential component of the ORCC Specific Plan Project are programmatically evaluated within this EIR as these 167 dwelling units are included within the City’s site



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inventory to meet its RHNA requirements. The other portions of the ORCC Specific Plan Project are not included within RHNA requirements and therefore are not included within this analysis. As such, specific impact findings associated with the development of the ORCC Specific Plan Project are being evaluated separately by the City in a standalone EIR. This EIR is not rezoning or entitling the ORCC Specific Plan pipeline project. As such, neither the ORCC Specific Plan Project nor the 167 dwelling units associated with the residential component of the ORCC Specific Plan Project are considered in the alternatives evaluation in this EIR.

4.4 ALTERNATIVES CONSIDERED AND REJECTED FROM FURTHER CONSIDERATION

As described above, State CEQA Guidelines Section 15126.6(c) provides that the range of potential alternatives for the project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. Alternatives that fail to meet the fundamental project purpose need not be addressed in detail in an EIR. (*In re Bay-Delta Programmatic Environmental Impact Report Coordinated Proceedings* (2008) 43 Cal.4th 1143, 1165-1167)

In determining what alternatives should be considered in the EIR, it is important to acknowledge the objectives of the Project, the Project's significant effects, and unique Project considerations. These factors are crucial to the development of alternatives that meet the criteria specified in Section 15126.6(a). Although, as noted above, EIRs must contain a discussion of "potentially feasible" alternatives, the ultimate determination as to whether an alternative is feasible or infeasible is made by lead agency decision-makers. (See PRC, Section 21081[a][3]). At the time of action on the Project, the decision-makers may consider evidence beyond that found in this EIR in addressing such determinations. The decision-makers, for example, may conclude that a particular alternative is infeasible (i.e., undesirable) from a policy standpoint, and may reject an alternative on that basis provided that the decision-makers adopt a finding, supported by substantial evidence, to that effect, and provided that such a finding reflects a reasonable balancing of the relevant economic, environmental, social, and other considerations supported by substantial evidence. (*City of Del Mar v. City of San Diego* [1982] 133 Cal.App.3d 401, 417; *California Native Plant Society v. City of Santa Cruz* [2009] 177 Cal.App.4th 957, 998.)

The EIR should also identify any alternatives that were considered by the lead agency but were rejected during the planning or scoping process and briefly explain the reasons underlying the lead agency's determination. The following alternatives were considered but are not evaluated further in this Draft EIR for the reasons discussed below.

4.4.1 Reduce Air Quality and Greenhouse Gas Emissions and VMT Impacts

The Draft EIR determined that future developments under the Project would likely result in significant and unavoidable impacts related to air quality and GHG emissions, and VMT. Developing an environmental alternative to reduce the determination to less than significant while keeping the amount of housing needed to satisfy the RHNA was considered. To reduce the air quality, GHG, and VMT impacts, the



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residential population in the City would need to increase without increasing daily trips per person so that the population growth outpaces VMT. A robust transit system including high priority transit areas and sufficient transit infrastructure linking jobs with housing would be required to accomplish this objective. While there is some transit serving the City, it is not sufficiently robust to be considered as a means of significantly reducing VMT. As identified previously, the eight Housing Opportunity Sites and Main Street Program are distributed throughout the City with the majority of the sites located within the northern portion of the City. For transit to make enough of a reduction in vehicle trips to reduce VMT and then by extension air quality and GHG emissions, it would need to be available throughout the City, and with sufficient frequency that it would encourage ridership. As this potential is well beyond the Project that is focused on increasing zoning for residential uses and involves a shift from personal car use to transit that is not currently possible, this alternative was ultimately not selected for further analysis in the EIR.

4.4.2 Dedication of Land for Parkland

The Draft EIR determined that future developments under the Project would likely result in significant and unavoidable impacts related to parkland. Developing an alternative to reduce the determination to less than significant by providing more parkland while keeping the amount of housing needed to satisfy the RHNA was considered. Under this alternative, future developments facilitated by the Project would be required to dedicate a portion of the project site for development of onsite parkland. This alternative would require developing the sites at a higher density than was envisioned in the Housing Element Update to accommodate the allocation of a portion of the project site for parkland uses and would require an increase in vertical development to accommodate the higher density required on the same size parcels. The City has a desired acreage requirement of five acres of parkland per 1,000 residents. As identified in Section 3.14, Recreation, of this Draft EIR, the resulting population growth from future developments facilitated by the Project would require an additional 14.46 acres of parkland within the City. The eight Housing Opportunity Sites and the Main Street Program area has a total land area of 104.45-acres; however, only 56.05-acres of the total land area is developable. Therefore, there would not be enough land available within the eight Housing Opportunity Sites and Main Street Program area to accommodate the additional parkland required while also providing enough dwelling units to meet the City's RHNA requirements. This alternative was determined to not be feasible and therefore, this alternative was not further analyzed in this Draft EIR.

4.5 ALTERNATIVES CONSIDERED

Alternatives to the Project considered for analysis in this Draft EIR are:

- No Project/Existing Zoning Alternative

4.5.1 No Project/Existing Zoning Alternative

The No Project/Existing Zoning Alternative assumes that certification of the Housing Element Update would not occur and the establishment of a new zoning designation and rezoning of specific parcels proposed as part of the Project would not occur. The six rezone sites identified for the eight Housing Opportunity Sites would not be rezoned to the new MC/RHD zoning district and would continue to be



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zoned its existing zoning designations. Additionally, the Main Street Program which proposes to amend the existing Main Street Specific Plan to allow for residential uses on the second story of structures within the Main Street Specific Plan area would not occur. Table 4.5-1 below outlines the existing zoning designations for the eight Housing Opportunity Sites and Main Street Program and the allowable dwelling units based on the existing zoning designations.

Table 4.5-1: No Project/Existing Zoning Alternative Buildout Assumption

Site Name	Existing Zoning	Dwelling Units based on Existing Zoning
Housing Opportunity Site 1 - 1780 Pacific Coast Highway	RMD	5
Housing Opportunity Site 2 - Leisure World	RHD-PD	177
Housing Opportunity Site 3 - Accurate Storage	RHD-20	36
Housing Opportunity Site 4 - The Shops at Rossmoor	GC	0
Housing Opportunity Site 5 - Old Ranch Town Center	GC	0
Housing Opportunity Site 6 - Seal Beach Plaza	SC	0
Housing Opportunity Site 7 - Seal Beach Center	SC	0
Housing Opportunity Site 8 - 99 Marina Drive	OE	0
Main Street Program	MSSP	0
Total Units		218

Notes:

RMD designation allow duplexes, townhouse projects, apartments, and small-lot, single-unit residential uses, at a density of 15 to 18 dwelling units per net acre.

RHD designation allow for multi-unit residential developments at a base density of 20 to 46 dwelling units per net acre. The maximum density allowed for Housing Opportunity Site 2 – Leisure World is 32.2 dwelling units per acre.

RHD-20 designation allow for multi-unit residential developments at a base density of 20 dwelling units per net acre.

GC designation does not permit any residential uses.

SC designation permits two-unit residential (duplex) if an existing use; new uses are prohibited.

OE designation does not permit any residential uses.

MSSP designation permits single-unit and multi-unit residential developments if an existing use; new uses are prohibited.

Under the No Project/Existing Zoning Alternative, the buildout assumptions for the eight Housing Opportunity Sites and Main Street Program would be 218 dwelling units based on the existing zoning designations. Under the No Project/Existing Zoning Alternative, the Housing Element and Zone Code Updates would not be implemented by the City and the current Housing Element and Zone Code would remain in effect. Land use densities and zoning would remain unchanged and development would be consistent with the existing zoning designation.

Additionally, as the residential component of the ORCC Specific Plan pipeline project would require land use amendments and rezoning from the existing General Plan land use and zoning designation to allow for the development of the ORCC Specific Plan, the 167 units associated with the residential component of the ORCC Specific Plan Project is not included within this alternatives analysis. Specific impact findings associated with the development of the ORCC Specific Plan Project are being evaluated separately by the City in a standalone EIR.



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Impact Analysis

Aesthetics

Under the No Project/Existing Zoning Alternative, the three Housing Opportunity Sites that allow for residential uses under the existing zoning designation would be developed in accordance with the existing zoning designation for the sites and the remaining Housing Opportunity Sites and Main Street Program area would not be redeveloped. This alternative would result in less potential future developments compared to the Project; however, it would still result in future developments that would change the existing character of the sites. The City's Municipal Code and General Plan identify development standards to ensure quality development in the City and any aesthetics related policies in the existing Housing Element would continue to be implemented. The aesthetic impacts would be similar to the Project and would be less than significant.

Air Quality

Under the No Project/Existing Zoning Alternative, rezoning of City land and increases in development density would not occur. The potential future development buildout under this alternative would be significantly less than compared to the Project and would result in lesser levels of criteria air pollutant emissions compared to the Project. Future developments under this alternative would require similar mitigation measures to reduce potential construction and operational emissions; however, as this alternative would require significantly less construction and would result in development of significantly less dwelling units than the Project, air quality impacts under this alternative would be less than impacts of the Project.

Biological Resources

Under this alternative, future developments would only take place on Housing Opportunity Sites 1, 2, and 3. As identified in Section 3.3, Biological Resources, of this Draft EIR, there are no special-status plant or wildlife species that have the potential to occur within Housing Opportunity Sites 1, 2, and 3. However, potential presence for bird species protected under the MBTA was identified for all Housing Opportunity Sites due to the potential for birds to nest in the trees that are dispersed throughout each site. Therefore, there would be a potential for bird species protected under the MBTA to occur within Housing Opportunity Sites 1, 2, and 3 under this alternative. Future developments under this alternative would require similar mitigation as those identified for the Project for preconstruction surveys for bird species and therefore, impacts under this alternative would be similar to the Project.

Cultural Resources

Under this alternative, future developments could result in potential impacts to cultural resources, including historic and archaeological resources, similar to the Project. As identified in Section 3.4, Cultural Resources, of the Draft EIR, Housing Opportunity Sites 1 and 2 include structures that are potentially 45 years or older and an identified historical resource (Naval Weapons Station) is located adjacent to Housing Opportunity Sites 1 and 3. Therefore, future developments under this alternative has the potential to directly and indirectly affect historical resources and would require further evaluation to



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identify potential impacts. Additionally, as the City has a high sensitivity to precontact and historic period archaeological cultural resources, future developments under this alternative could result in discovery of previously unidentified archaeological resources. As such, future developments under this alternative would require similar mitigation as those identified for the Project and therefore, impacts under this alternative would be similar to the Project.

Energy

Under this alternative, development of future developments would result in increased construction and operational energy demand from existing conditions. However, as identified in Section 3.5, Energy, of this Draft EIR, future developments under the Project would not result in significant increases in energy usage and impacts would be less than significant. Though future developments under this alternative would increase energy demand and consumption from existing conditions, as this alternative would result in development of less dwelling units than the Project, future developments under this alternative would not result in significant increases in energy usage. Therefore, impacts under this alternative would be similar to the Project.

Geology and Soils

Under this alternative, future developments would take place on Housing Opportunity Sites 1, 2, and 3. As identified in Section 3.6, Geology and Soils, of this Draft EIR, new ground disturbance that occurs in geologic units with high paleontological potential may encounter paleontological resources. This could occur at any depth in the Housing Opportunity Sites 1 and 3, and at depths greater than an estimated 5 feet at the Housing Opportunity Site 2. As such, future developments under this alternative would require similar mitigation as those identified for the Project and therefore, impacts under this alternative would be similar to the Project.

Greenhouse Gas Emissions

Under the No Project/Existing Zoning Alternative, rezoning of City land and increases in development density would not occur. The potential future development buildout under this alternative would be significantly less than compared to the Project and would result in lesser levels of GHG emissions compared to the Project. Future developments under this alternative would require similar mitigation measures to reduce potential GHG emissions; however, as this alternative would require significantly less construction and would result in development of significantly less dwelling units than the Project, GHG impacts under this alternative would be less than impacts of the Project.

Hazards and Hazardous Materials

Under this alternative, future developments would take place on Housing Opportunity Sites 1, 2, and 3. As identified in Section 3.8, Hazards and Hazardous Materials, of this Draft EIR, all Housing Opportunity Sites are located within the AIA for the Los Alamitos JFTB AELUP except for Housing Opportunity Site 8 and the southern half of Main Street Program. As future developments under this alternative would be developed in accordance with the existing zoning designation of the sites and would not propose General Plan or zoning code amendments, future developments under this alternative would not be subject to



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review by the Orange County ALUC. The Project was determined to result in less than significant impacts to hazards and hazardous materials and as this alternative would result in less than significant impact, impacts under this alternative would be similar to the Project.

Hydrology and Water Quality

Housing Opportunity Sites 1, 2, and 3 are developed with existing uses and therefore, development of these sites under this alternative are not anticipated to interfere substantially with groundwater recharge. However, future developments under this alternative would result in increased water demand from existing conditions which may result in increased demand to groundwater pumping for the City to supply adequate water to its customers. Operation of future developments under this alternative could potentially increase the rate and amount of surface runoff and could create flood hazards. To prevent long-term impacts related to Project operation, new developments would be required to comply with City Municipal Code requirements related to stormwater management similar to the Project. However, as there are existing storm drainage capacity issues within portions of the City, future developments under this alternative may result in flooding related impacts due to the existing drainage system in the City not providing adequate capacity, similar to the Project. Therefore, future developments under this alternative would require implementation of similar mitigation measures identified for the Project to prepare an evaluation to determine the potential impacts the proposed development would have on the existing deficiencies to the City's storm drainage system and provide mitigation measures to resolve impacts to the City's storm drain infrastructure. Future developments under this alternative would require similar mitigation measures as those identified for the Project to reduce potential impacts to a less than significant level. Impacts under this alternative would be similar to the Project.

Land Use and Planning

Under this alternative, a total of 218 dwelling units would be planned for within the City, compared to the Project's 1,606 dwelling units across the eight Housing Opportunity Sites and Main Street Program. The six Housing Opportunity Sites identified for rezoning under the Project would not be rezoned and would remain its existing zoning designation. Additionally, the Main Street Program which proposes amendments to allow for development of second story dwelling units within the Main Street Specific Plan area would not be implemented. As the purpose of this Project is to plan for the future development of dwelling units to meet the City's share of regional housing needs, this alternative would not accomplish this goal. The City's has an RHNA of 1,243 dwelling units within the current planning period. This alternative would only provide for the planning of 218 dwelling units and would not meet the RHNA requirement for the City. Even with inclusion of anticipated ADUs and the residential component of the ORCC Specific Plan pipeline project identified by the City to meet RHNA, this alternative would not provide for the planning of enough units for the City to meet its RHNA. Therefore, this alternative would not contribute toward the City's RHNA numbers and would result in a greater land use and planning impact compared to the Project.

Noise

Future developments under this alternative would result in increased construction and operation noise in the vicinity of Housing Opportunity Sites 1, 2, and 3. The Project was determined to result in temporary and permanent increase in noise and vibration levels from future developments under the Project due to



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construction and operational activities. However, all impacts were mitigated to a less than significant level with the implementation of mitigation measures identified in Section 3.11, Noise. Future developments under this alternative would be required to implement similar mitigation measures as those identified in this Draft EIR to reduce construction and operational noise as it would result in activities that would introduce new noise generating uses at the sites. However, future developments under this Project would require less construction activities and would result in a smaller increase in traffic noise within the City. Therefore, impacts under this alternative would be less than the Project.

Population and Housing

As identified in Section 3.12, Population and Housing, of this Draft EIR, the City has an average household size of 1.8 persons per household. This alternative would result in the planning of 218 dwelling units which would result in a population growth of 392 residents. This alternative would generate significantly less new residents compared to the Project's projected generation of 2,891 residents. Therefore, impacts under this alternative would be less than the Project.

Public Services

Under this alternative, increases in demand for public services including fire and police protection and parks from existing conditions would result due to increased population growth from future developments. However, the increase in demand would be less than what would result from future developments facilitated by the Project as this alternative would result in less population growth and development compared to the Project. Though the increase in demand for this alternative would be less than the Project, this alternative would still result in a significant and unavoidable impact to parks. As identified in Section 3.13, Public Services, of this Draft EIR, the City is not currently meeting its desired acreage requirements for parkland and excess park and recreation land does not exist to meet the forecasted demand that would be generated by future developments. The City is already at a deficit for park and recreation land and the increased population growth that would result from this alternative would increase the deficit. Therefore, impacts to public services under this alternative would be significant and unavoidable and would be similar to the Project.

Recreation

As stated above, under this alternative, increases in demand for park and recreational facilities would result due to increased population growth from future developments. Though the increase in demand would be less than what would result from future developments facilitated by the Project, this alternative would still result in a significant and unavoidable impact to parks. The City is not currently meeting its desired acreage requirements for parkland and excess park and recreation land does not exist to meet the forecasted demand that would be generated by future developments. The City is already at a deficit for park and recreation land and the increased population growth that would result from this alternative would increase the deficit. Therefore, impacts to recreation under this alternative would be significant and unavoidable and would be similar to the Project.



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Transportation

Under this alternative, traffic conditions at the future development sites and in the vicinity would change from existing conditions and additional traffic would be generated from construction and operational activities. However, compared to future developments facilitated by the Project, this alternative would result in a smaller increase in additional traffic as future developments under this alternative would develop significantly less dwelling units.

As identified in Section 3.15, Transportation, of this Draft EIR, individual development of the eight Housing Opportunity Sites and Main Street Program were determined to result in VMT generation that would be above the threshold of significance. Therefore, development of Housing Opportunity Site 1 under this alternative would continue to result in VMT generation that would be above the threshold of significance as this alternative would develop Housing Opportunity Site 1 with the same number of units as the Project. As identified in Section 3.15, Transportation, Housing Opportunity Site 2 was determined to generate VMT at below the threshold of significance and as development of Housing Opportunity Site 2 under this alternative would continue to develop the site with the same number of units as proposed under the Project, development of Housing Opportunity Site 2 under this alternative would generate VMT at below the threshold of significance. Development of Housing Opportunity Site 3 with 36 units under this alternative compared to the Project's 83 units would be anticipated to reduce VMT generated at the site to below the threshold of significance. Future developments under this alternative would require implementation of similar mitigation measures as identified for the Project. However, future development of Housing Opportunity Site 1 under this alternative would continue to generate VMT above the threshold of significance. Therefore, impacts to transportation under this alternative would be significant and unavoidable and would be similar to the Project.

Tribal Cultural Resources

Under this alternative, future developments would occur within Housing Opportunity Sites 1, 2, and 3. As identified in Section 3.16, Tribal Cultural Resources, of this Draft EIR, the NAHC SLF search resulted in a positive result for tribal cultural resources and the City is located in an area of high sensitivity for precontact Native American resources. Therefore, future developments under this alternative could require ground-disturbing activities in portions of the City that may have sensitive tribal cultural resources and may cause disturbance to tribal cultural resources by potentially unearthing previously unknown/unrecorded tribal cultural resources. As such, future developments under this alternative would require similar mitigation as those identified for the Project and impacts under this alternative would be similar to the Project.

Utilities and Service Systems

Under this alternative, future developments would result in increased demand for water supplies, wastewater treatment, and utility infrastructure from existing conditions. However, as this alternative would result in planning for significantly fewer number of dwelling units compared to the Project, the demand generated by this alternative would be less than the demand generated by the Project. As identified in Section 3.17, Utilities and Service Systems, with compliance with mandatory requirements under the City's various programs aimed at ensuring adequate supplies and service infrastructure are



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available to serve the development and adherence to existing programs, requirements, and regulations, impacts would be less than significant. Additionally, adequate water supplies and wastewater treatment capacity was determined to be available to serve future developments facilitated by the Project. As future developments under this alternative would result in significantly fewer number of dwelling units compared to the Project and thereby less demand, there would be adequate water supplies, wastewater treatment capacity, and utility infrastructure to serve future developments under this alternative. As the increase in demand under this alternative would be less than compared to the Project, impacts under this alternative to utilities and service systems would be less than the Project.

Conclusion and Relationship to Project Objectives

The No Project/Existing Zoning Alternative would result in less impacts related to air quality, GHG, noise, population and housing, and utilities and service systems compared to the Project. However, the No Project/Existing Zoning Alternative would result in similar impacts as the Project to aesthetics, biological resources, cultural resources, energy, geology and soils, hazards and hazardous materials, hydrology and water quality, public services, recreation, transportation, and tribal cultural resources. Finally, the No Project/Existing Zoning Alternative would result in greater impacts to land use and planning than the Project. The No Project/Existing Zoning Alternative would not reduce the significant and unavoidable impacts to public services, recreation, and VMT and would not help the City meet its RHNA requirements as it would not plan for enough dwelling units. Additionally, the No Project/Existing Zoning Alternative would not meet the following Project objectives:

- Encourage new housing for households at all income levels and for households with a range of diverse housing needs.
- Amend land use standards and designations in the City's Zoning Code, Specific Plans, General Plan as needed to comply with state law and meet the required Regional Housing Needs Allocation.
- Remove undue constraints on new housing development, including for affordable housing development.
- Affirmatively further fair housing.

4.6 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

The CEQA Guidelines require the identification of an environmentally superior alternative (Section 15126.6(e)), which is the alternative that best avoids or lessens any significant impacts of the Project, even if the alternative would impede to some degree attainment of the Project objectives. If it is determined that the "no project" alternative would be the environmentally superior alternative, then the EIR shall also identify an environmentally superior alternative among the other project alternatives (Section 15126.6(3)). The qualitative environmental effects of each alternative in relation to the Project are summarized in Table 4.6-1. To quantitatively identify an environmentally superior alternative a value has been applied to each environmental effect. Additionally, Table 4.6-2 provides a comparison of the



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alternatives with the Project objectives. Accordingly, the alternative with the fewest amounts of impacts and the ability to achieve the most Project objectives is the environmentally superior alternative.

Table 4.6-1: Project Alternative Impact Comparison

Environmental Resource Topic	Project	No Project/Existing Zoning Alternative
Aesthetics	LTS	=
Air Quality	SU	-
Biological Resources	LTS/M	=
Cultural Resources	LTS/M	=
Energy	LTS	=
Geology and Soils	LTS/M	=
Greenhouse Gases	SU	-
Hazards and Hazardous Materials	LTS	=
Hydrology and Water Quality	LTS/M	=
Land Use and Planning	LTS	+
Noise	LTS/M	-
Population and Housing	LTS	-
Public Services	SU	=
Recreation	SU	=
Transportation	SU	=
Tribal Cultural Resources	LTS/M	=
Utilities and Service Systems	LTS	-

Notes:

Equal impact (=)

Less impact (-)

Greater impact (+)

Table 4.6-2: Project Alternatives Comparison to Project Objectives

Project Objective	Project	No Project/Existing Zoning Alternative
Protect and improve quality of life for current and future residents.	X	X
Encourage new housing for households at all income levels and for households with a range of diverse housing needs.	X	
Amend land use standards and designations in the City's Zoning Code, Specific Plans, General Plan as needed to comply with state law and meet the required Regional Housing Needs Allocation.	X	
Remove undue constraints on new housing development, including for affordable housing development.	X	
Affirmatively further fair housing.	X	



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Alternatives to the Proposed Project

As shown above, the No Project/Existing Zoning Alternative would be the environmentally superior alternative as the significant impact of the Project related to air quality and GHG would be reduced. However, the No Project/Existing Zoning Alternative would increase potential impacts to land use and planning and would not meet the majority of the Project objectives.

As required by CEQA, if it is determined that the “no project” alternative would be the environmentally superior alternative, then the EIR shall also identify an environmentally superior alternative among the other project alternatives (Section 15126.6(3)). As all other Project Alternatives were considered to be infeasible and rejected from further consideration, the Project is identified as the environmentally superior alternative as it would achieve all of the Project objectives and would help the City meet its RHNA requirements.

