

## **SECTION 5.0 ALTERNATIVES TO THE PROPOSED PROJECT**

### **5.1 INTRODUCTION**

Section 15126.6 of the California Environmental Quality Act (CEQA) Guidelines addresses the discussion of alternatives in an EIR. Key provisions of the CEQA Guidelines are identified throughout this section to explain the basis for the alternatives evaluation in this EIR. Section 15126.6(a) states:

An EIR shall 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, 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. An EIR is not required to consider alternatives that are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.

#### **5.1.1 PROJECT SUMMARY**

The proposed project is the comprehensive update to the *City of Arcadia General Plan*. The current General Plan was last updated and adopted by the City in 1996, with the Housing Element updated in 2001. Based on the collective goals and needs of residents, business owners, stakeholders, community groups, City staff and leaders, the proposed General Plan Update has been guided by the following principles:

- Balanced Growth and Development,
- Connectivity,
- Neighborhood Character,
- Schools,
- Cultural Diversity,
- Environmental Sustainability,
- City Services,
- Changing Housing Needs,
- Economic Health, and
- Preservation of Special Assets.

The proposed 2010 General Plan Update would establish the planned development patterns and maximum intensities for the City and its Sphere of Influence, and serve as a policy guide for determining the appropriate physical development and character of the City. The 2010 General Plan is organized into the following ten chapters: (1) Introduction; (2) Land Use and Community Design Element; (3) Economic Development Element; (4) Circulation and Infrastructure Element; (5) Housing Element; (6) Resource Sustainability Element; (7) Parks, Recreation, and Community Resources Element; (8) Safety Element; (9) Noise Element; and

(10) Implementation Plan. Refer to Section 3.0, Project Description, of this EIR for a summary of the proposed General Plan Update, including the proposed Land Use Policy Map and the major goals of each General Plan Element.

### **5.1.2 PROJECT OBJECTIVES**

CEQA Guidelines Section 15124(b) indicates that an EIR should include “a statement of objectives sought by the proposed project”. The proposed General Plan Update seeks to achieve the following key objectives, which are based on the City’s Guiding Principles for future decision-making:

- (1) To establish a balance and mix of land uses that promote economic growth and maintain a high quality of life for Arcadia residents.
- (2) To promote a balanced, integrated, multi-modal circulation system, which includes streets, sidewalks, bikeways, and trails, that is efficient and safe and that connects neighborhoods to jobs, shopping, services, parks, and open space areas.
- (3) To preserve the City’s identity as a “Community of Homes” by protecting and preserving the character and quality of its neighborhoods by requiring harmonious design, careful planning, and the integration of sustainable principles.
- (4) To maintain a commitment to working with the school district to achieve mutually beneficial goals.
- (5) To embrace and celebrate the cultural diversity of Arcadia through the promotion of activities and programs that strengthen the community bonds.
- (6) To affirm the City’s commitment to environmental sustainability by taking actions that work toward achieving regional environmental quality goals, providing local government support, encouraging partnerships, and fostering innovation in sustainable principles.
- (7) To provide high-quality services that generate a source of civic pride and bring the community together.
- (8) To encourage the retention, rehabilitation, and development of diverse housing that meets people’s needs in all stages of their lives.
- (9) To promote a healthy economy with a diversified employment and fiscal base that is accessible to local residents and responsive to local needs, while providing a balance of regional serving businesses that attract additional regional income.
- (10) To maintain and enhance special places and features that contribute to the City’s character, such as Santa Anita Park, the Los Angeles County Arboretum and Botanical Garden, a vibrant Downtown, the urban forest, attractive streetscapes, diverse parks, historic buildings and places, and nearby mountain views.

### **5.1.3 SIGNIFICANT AND UNAVOIDABLE IMPACTS**

As previously mentioned, an EIR should consider a range of feasible alternatives that would attain most of the project objectives listed above, while reducing one or more of the significant and unavoidable impacts of the proposed General Plan Update, which include:

- Air Quality (Air Quality Standards Violation, Exposure of Sensitive Resources, and Cumulative Air Quality Impacts);
- Greenhouse Gas Emissions (Increase in GHG and Cumulative Impacts);
- Noise (Noise Standard Violation and Cumulative Impacts); and
- Transportation/Traffic (Circulation System Performance and Cumulative Impacts).

### **5.1.4 ALTERNATIVES TO THE PROPOSED PROJECT**

In accordance with the CEQA Guidelines Section 15126.6(a), this section summarizes the range of alternatives considered in the EIR. The following alternatives have been considered and eliminated from detailed consideration for the reasons identified in Section 5.2, below.

- Alternative Site;
- Expanded Mixed Use Land Use Plan; and
- Reduced Residential Density Alternative.

Alternatives that are considered in detail in this EIR include:

- Alternative 1: No Project/No Development;
- Alternative 2: No Project/Existing General Plan;
- Alternative 3: Reduced Commercial Alternative; and
- Alternative 4: Expanded Downtown Focus Area.

## **5.2 ALTERNATIVES ELIMINATED FROM DETAILED CONSIDERATION**

Section 15126.6(c) of the CEQA Guidelines specifies that an EIR should (1) identify alternatives that were considered by the lead agency but were eliminated from detailed consideration because they were determined to be infeasible during the scoping process and (2) briefly explain the reasons underlying the lead agency's determination. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are (1) failure to meet most of the basic project objectives; (2) infeasibility; or (3) inability to avoid significant environmental impacts.

### **5.2.1 ALTERNATIVE SITE**

Section 15126.6(f)(2)(A) of the CEQA Guidelines indicates that, in determining the consideration of an alternative location, "The key question and first step in analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR". Section 15126.6(f)(3) of the CEQA Guidelines further states "an EIR need not consider an

alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative". Because the goals, policies and implementation actions, as well as the Land Use Policy Map, Roadway Plan, and other plans in the proposed General Plan Update, are specific to and encompass the entirety of the City of Arcadia and its Sphere of Influence, an alternative site where the City has no jurisdiction is not feasible. Therefore, further analysis of an alternative site in this EIR is not required.

## **5.2.2 EXPANDED MIXED USE LAND USE PLAN**

During the General Plan Update process, the General Plan Advisory Committee (GPAC) reviewed and developed a number of land use plans that identified proposed changes in land use designations and allowable development intensities. The Land Use Plan that was initially forwarded by the GPAC for review by the Arcadia Planning Commission and City Council included ten focus areas where future development would be expected through changes in land use designations and allowable intensities. This Land Use Plan included separation of the Mixed Use, Commercial, and Public designations into three designations for each; increases in allowable density for High Density Residential areas; expanded Mixed Use areas; and redesignation of Commercial/Industrial areas. The Planning Commission and City Council considered the GPAC recommendation too aggressive since it would result in significant land use changes in the City. Thus, they directed the GPAC to revisit the focus areas and recommended that no additional mixed use areas be allowed along Foothill Boulevard, Duarte Road, Baldwin Avenue and Las Tunas Avenue. Since this alternative has been considered and rejected by the City Council and would result in greater environmental impacts than the proposed Land Use Policy Map presented in the proposed General Plan Update, further analysis in this EIR is not required.

## **5.2.3 REDUCED RESIDENTIAL DENSITY ALTERNATIVE**

Due to concerns for increased development density in the City, this alternative considers a reduction in the maximum residential density that would be allowed in the Downtown Mixed Use area and the Mixed Use areas along Live Oak Avenue and First Avenue. Since future residential developments or mixed use developments can be developed at densities less than 30 to 50 dwelling units per acre, discussions centered on reducing the maximum densities to no more than 24 to 30 units per acre. The decrease in the development capacity of the downtown area and along First Avenue and Live Oak Avenue would not promote reinvestment, redevelopment and revitalization of these areas, which would be inconsistent with the City's goals as contained in the Land Use and Community Design Element and Economic Development Element. This alternative would also not meet the City's goals for pedestrian-oriented, walkable, and vibrant mixed use areas that promote the use of alternatives to the automobile, as contained in the Land Use and Community Design Element. In addition, this alternative would effectively reduce the buildout capacity of the City in terms of housing stock and residential population. With the lower dwelling unit capacity, the City would not be able to meet its future housing needs under the Regional Housing Needs Assessment (RHNA). A General Plan that could not accommodate the future housing needs of the City would not meet State requirements; would result in reduced housing opportunities; and would not meet the housing goals of the City as contained in the proposed Housing Element. Thus, this alternative has been rejected from further consideration.

## **5.3 ALTERNATIVES CARRIED FORWARD FOR DETAILED CONSIDERATION**

The analysis of each of the project alternatives identified below includes the following:

- A description of the alternative.
- An analysis of environmental impacts and a comparison to the possible impacts of the proposed project. Pursuant to the CEQA Guidelines, if an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed.
- An assessment of the alternative's ability to meet the project objectives (previously identified in Section 5.1.2).

The comparison of impacts between each alternative and the proposed General Plan Update assumes that the general nature and types of (1) existing Standard Conditions/Requirements (SCs); (2) proposed General Plan goals, policies, and implementation actions; and (3) the Mitigation Measures (MMs) identified in Section 4.0, Environmental Analysis, of this EIR would also be applicable to each of the alternatives, where appropriate. No SCs or MMs are applied to the No Project/No Development Alternative, which basically assumes that the existing conditions in the City would remain unchanged.

### **5.3.1 ALTERNATIVE 1: NO PROJECT/NO DEVELOPMENT ALTERNATIVE**

CEQA Guidelines Section 15126.6(e) requires that an EIR evaluate a "no project" alternative in order to allow decision makers to compare the impacts of approving a proposed project with the impacts of not approving that project. CEQA Guidelines Section 15126.6(e)(3) describes the two general types of no project alternative: (1) when the project is the revision of an existing land use or regulatory plan, policy or ongoing operation, the no project alternative would be the continuation of that plan and (2) when the project is not a land use/regulatory plan, such as a specific development on an identifiable property, the no project alternative is the circumstance under which that project is not processed (i.e., no development occurs). Alternative 1 represents the no project alternative assuming that no additional development would occur in the City.

#### **Description of the Alternative**

This alternative assumes that no new development will occur in the City and existing land uses and environmental conditions will remain as is, indefinitely. This assumes that the City would not allow any new development project in the City of Arcadia, except for the replacement of existing land uses with the same type and size of land uses. Under this alternative, vacant lands will remain undeveloped. Alternative 1: No Project/No Development Alternative is not considered feasible due to private ownership of lands in the City and the need to protect individual property rights. Property owners on vacant lands have the right to an economic use of their property, which this alternative would prevent. This alternative could only be implemented if the City bought out vacant lands and designated them as open space for permanent preservation.

#### **Comparative Analysis of Environmental Impacts**

##### ***Aesthetics***

Alternative 1 would not result in any changes to the visual quality or aesthetics of existing developments in the City and its Sphere of Influence (SOI). No impacts related to aesthetics, including the introduction of new structures, changes to scenic resources (hillside areas), scenic highways, or introduction of new sources of light and glare, would occur. The impacts of this alternative on aesthetics would be less than the impacts of the proposed General Plan Update.

### ***Agriculture and Forest Resources***

Alternative 1 would not result in any modifications to existing land uses in the City. No impacts on agriculture would occur since no agricultural lands or uses are present in or near the City and its SOI. With no new development, no impacts on forest lands located to the north of the City would occur. The impact of this alternative on agriculture and forest resources would be less than the impact of the proposed General Plan Update.

### ***Air Quality***

Alternative 1 would not involve any changes to the land uses in the City and its SOI, and thus, it would not generate new sources of pollutant emissions. No impacts to air quality would occur. The impact of this alternative on air quality would be less than the impact of the proposed General Plan Update.

### ***Biological Resources***

Alternative 1 would have not disturb or destroy existing plant and animal species or their habitats in the City and its SOI since no new development would occur in the City and its SOI. No sensitive species, riparian habitat, wetlands, natural communities, or wildlife corridors would be affected on undeveloped land and infill lots. The impact of this alternative on biological resources would be less than the impact of the proposed General Plan Update and less than significant.

### ***Cultural Resources***

Alternative 1 would not involve ground disturbance and would avoid any potential impacts to known and unknown historical, archaeological and paleontological resources, since no future development would occur in the City and its SOI. With no changes to existing land uses, this alternative would not involve any new development and would, therefore, not directly or indirectly impact any known historic resources in terms of demolition, alteration, or transition of use. The impact of this alternative on cultural resources would be less than the impact of the proposed General Plan Update and less than significant.

### ***Geology and Soils***

Alternative 1 would not involve any grading, excavation, construction, or building activities. Therefore, no changes in the local geology and soils would occur. Also, no increase in property and personal exposure to existing geologic and seismic hazards in the City would occur. The impact of this alternative on geology and soils would be less than the impact of the proposed General Plan Update.

### ***Hazards and Hazardous Materials***

Alternative 1 would not change existing hazards, including wildland fires, aircraft hazards, and hazardous materials, in the City and its SOI. This No Project/No Development Alternative would also not increase the resident population that would be exposed to existing hazards related to hazardous material use, wildfires, and airport hazards in the City and SOI. No impacts related to hazards and hazardous materials would occur. The impact of this alternative on hazards and hazardous materials would be less than the impact of the proposed General Plan Update.

### ***Hydrology and Water Quality***

Alternative 1 would not involve any changes to the topography of the City, including drainage patterns, the storm drain system, percolation rates, runoff volumes, and other hydrologic conditions in the City and its SOI. There would be no new sources of urban runoff or increases in storm water pollutants; therefore, no impacts related to water quality would occur. The impact of this alternative on hydrology and water quality would be less than the impact of the proposed General Plan Update.

### ***Land Use and Planning***

Alternative 1 would not result in any changes to existing land uses or land use designations in the City and its SOI. Also, existing land use policies would remain the same. No division of established communities would occur. The impact of this alternative on land use and planning would be less than the impact of the proposed General Plan Update.

### ***Mineral Resources***

Alternative 1 would not result in any ground disturbance in the City and its SOI. No impacts related to the loss of access to mineral resources would occur. Also, no demand for mineral resources for the construction of structures and infrastructure would occur. The impact of this alternative on mineral resources would be less than the impact of the proposed General Plan Update.

### ***Noise***

Alternative 1 would not result in new development in the City and no new sources of noise would be introduced. At the same time, no noise-sensitive uses would be developed, which may be exposed to freeway, train, airport, and other noise sources in and near the City. Therefore, no new noise impacts would occur. The impact of this alternative on noise would be less than the impact of the proposed General Plan Update.

### ***Population, Housing, and Employment***

Alternative 1 would not create any new jobs nor involve the development of additional housing that may increase the resident population of the City and its SOI. Also, no displacement of existing housing units or households would occur. Therefore, no impacts related to population, housing, and employment would occur. However, this alternative would not meet the City's future housing needs, as allocated by the RHNA. The impact of this alternative on population, housing, and employment would be less beneficial than the impact of the proposed General Plan Update.

### ***Public Services***

Alternative 1 would not involve any changes to existing land uses and thus, would not change existing demands for public services. No impact to public services would occur and no new public facilities would be needed. The impact of this alternative on public services would be less than the impact of the proposed General Plan Update.

## ***Recreation***

Alternative 1 would not lead to new housing development, which may create a demand for or an impact on recreational facilities and parks. No new impacts on recreation would occur. The impact of this alternative on recreation would be less than the impact of the proposed General Plan Update.

## ***Transportation and Traffic***

Alternative 1 would not involve any changes to the land uses in the City or its SOI and thus, would not generate additional vehicle trips to and from the City. No new impacts related to traffic and circulation and alternative transportation systems would occur. The impact of this alternative on traffic and circulation would be less than the impact of the proposed General Plan Update.

## ***Utilities and Service Systems***

Alternative 1 would not involve any changes to existing land uses nor would it create new demand for utilities and service systems. The impact of this alternative on utilities would be less than the impact of the proposed General Plan Update.

## ***Greenhouse Gas Emissions***

Alternative 1 would not involve any new development in the City or its SOI and would not generate any new greenhouse gas (GHG) emissions. Thus, contributions to global warming potential would remain the same, as consistent with existing conditions.

However, this alternative would not add sustainability goals and policies that would promote green technologies to accompany new development in the City. Without new development, the retrofit of older, less energy-efficient structures with energy-efficient technology or replacement with energy-efficient development would not occur. Although no new vehicle trips associated with new development would occur, the benefits associated with new green development would not occur either. This alternative is not consistent with plans and policies for GHG reduction. Alternative 1, as with the proposed General Plan Update, would result in significant cumulative impacts.

## **Conclusion**

Alternative 1 would result in fewer impacts on most issue areas than the proposed General Plan Update. Alternative 1 would also avoid the significant unavoidable impacts that would occur with changes to existing land uses and future development in the City, including (1) increased inconsistency with the AQMP for the South Coast Air Basin; (2) cumulative increases in pollutant emissions that would add to existing air quality violations; (3) exceedance of LOS standards on local roadways; and (4) cumulative contribution to global warming. For the remaining topical issues, Alternative 1 would result in no impacts while the proposed General Plan Update would result in less than significant impacts or potentially significant impacts that can be mitigated to a level considered less than significant.

While Alternative 1 would result in fewer environmental impacts than the proposed General Plan Update for all environmental issues and would not result in unavoidable impacts on air quality and transportation that would occur with the proposed General Plan Update, this alternative would not meet any of the project objectives identified in Section 5.1.2.



### **5.3.2 ALTERNATIVE 2: NO PROJECT/EXISTING GENERAL PLAN ALTERNATIVE**

As discussed previously in Section 5.3.1, CEQA Guidelines Section 15126.6(e) requires that an EIR evaluate a “no project” alternative to allow decision makers to compare the impacts of approving a proposed project with the impacts of not approving that project. In addition, Section 15126.6(e)(2) of the CEQA Guidelines specifies that the “No Project analysis shall discuss the existing conditions at the time the Notice of Preparation (NOP) is published, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services”.

#### **Description of the Alternative**

Because the proposed project is an update of the current General Plan for the City of Arcadia, with a revision of an existing Land Use Map (contained in the City’s General Plan), pursuant to CEQA Guidelines Section 15126.6(e)(3)(A), this No Project/Existing General Plan Alternative considers the comparative environmental impacts of the continued implementation of the current General Plan through the year 2035, the buildout year of the proposed General Plan Update. This alternative assumes the current General Plan would remain as the adopted long-range planning policy document for the City of Arcadia, with future development occurring pursuant to the City’s current General Plan goals and policies and Land Use Map. The current Land Use Map is provided in Exhibit 4.9-1 in Section 4.9, Land Use and Planning, of this EIR. Buildout under this alternative (the City’s current General Plan) is estimated at 22,128 units in the City and its SOI, with 60,940 residents and over 12.2 million square feet of non-residential development. This development capacity would lead to 2,443 fewer dwelling units, 6,656 fewer residents, and 2.4 million square feet of non-residential development less than the development capacity of the proposed General Plan Update.

#### **Comparative Analysis of Environmental Impacts**

##### ***Aesthetics***

Due to the overall similarities between the current and proposed land use plans, this Alternative would result in aesthetic impacts similar to the proposed General Plan Update. As with the proposed General Plan Update, buildout of Alternative 2 would limit new development to vacant land and the transition of underutilized land to more intensive uses. Development within the scenic foothills of the San Gabriel Mountains would be based on the allowable development densities, which are the same under both the existing and proposed General Plans. Alternative 2 would result in fewer sources of light and glare compared to the proposed General Plan Update, due to the lower residential density allowed in High Density Residential areas and Mixed Use areas and less non-residential development capacity. As with the proposed General Plan Update, Alternative 2 would result in less than significant impacts on aesthetics. The impact of this alternative on aesthetics would be less than the impacts of the proposed General Plan Update.

##### ***Agriculture and Forest Resources***

Alternative 2 would allow for the development of land throughout the City, similar to the proposed General Plan Update. Since no agricultural lands or uses are present in the City, no impacts on agricultural resources or Farmlands would occur. With the same development density allowed at the northern end of the City under both General Plans and with the distance separation to adjacent forest land to the north, no impacts to forest land would occur. The

impact of this alternative on agriculture and forest resources would be the same as the impact of the proposed General Plan Update.

### ***Air Quality***

Alternative 2 would generate pollutant emissions from stationary and mobile sources that would accompany future development allowed under the current Land Use Map. While this impact is the same as the proposed General Plan Update, Alternative 2 allows a different mix of land uses in the City, which is projected to result in less pollutant emissions than the proposed General Plan Update due to less residential and non-residential development capacity. The current General Plan is also consistent with the AQMP, since it was used in the development of projections for housing, household, and employment for the City by the Southern California Association of Governments (SCAG). This alternative would have less impact on air quality than the proposed General Plan Update due to the lower potential for pollutant emissions. However, impacts would also be significant and unavoidable due to contributions to existing air quality violations.

### ***Biological Resources***

While the same development would occur in the hillside areas at the northern section of the City, Alternative 2 would have greater impacts on existing biological resources since existing parks and storm drain channels are designated as Public, while the proposed General Plan Update redesignates them as Open Space - Outdoor Recreation or Open Space - Resource Protection, where no development would be allowed. The impact of this alternative on biological resources would be greater than the impact of the proposed General Plan Update.

### ***Cultural Resources***

As with the proposed General Plan Update, Alternative 2 would allow for continued development throughout the City and its SOI. Alternative 2 would be subject to the same standard conditions and mitigation measures regarding historic, archaeological, and paleontological resources as the proposed General Plan Update, and potential impacts would be reduced to less than significant levels. Potential impacts to cultural resources would be similar to the proposed General Plan Update and less than significant.

### ***Geology and Soils***

Alternative 2 would involve new development in City, similar to the proposed General Plan Update. Compliance with existing federal, State, and local regulations would reduce impacts to less than significant levels, as with the proposed General Plan Update. With less development potential, less exposure to exiting geologic and seismic hazards in the City would occur. Impacts on geology and soils would be less under this alternative than under the proposed General Plan Update and less than significant.

### ***Hazards and Hazardous Materials***

With less development capacity and population at buildout under Alternative 2, the number of residents at risk from wildland fires, aircraft hazards, or exposure to hazardous materials would be less than that of the proposed General Plan Update. Impacts associated with hazards and hazardous materials would be less than those associated with the proposed General Plan Update. However, as with the proposed General Plan Update, impacts associated with hazards

and hazardous materials would be less than significant due to compliance with applicable regulations.

### ***Hydrology and Water Quality***

Implementation of Alternative 2 would result in changes in hydrology and water quality due to future development under the current General Plan. Implementation of the standard conditions would avoid downstream and off-site impacts would reduce storm water pollutants from the City. As with the proposed General Plan Update, impacts associated with hydrology and water quality would be less than significant. With a lower development potential, less impacts on hydrology and water quality would occur under this alternative than the proposed General Plan Update.

### ***Land Use and Planning***

Alternative 2 proposes a different mix of land uses in the City at buildout than the proposed General Plan Update. Fewer dwelling units and less non-residential development are expected under this alternative due to the lower residential density for High Density Residential areas and Mixed Use areas and lower allowable floor area ratio (FAR) for Mixed Use areas. This difference does not change the level of impact between Alternative 2 and the proposed General Plan Update, and impacts would be less than significant.

### ***Mineral Resources***

Implementation of Alternative 2 would involve new development in the City, similar to the proposed General Plan Update. Access to local mineral resources would not change since the quarry site at the southeastern end of the City has been mined. Demand for mineral resources for new development would be less due to the lower development capacity under Alternative 2. Less impact on mineral resources would occur under this alternative than the proposed General Plan Update, and impacts would be less than significant.

### ***Noise***

Buildout under Alternative 2 would result in fewer residents in the City that would be exposed to traffic noise levels along major roadways, the Interstate 210 (I-210) Freeway, and nearby airport. Therefore, noise impacts are expected to be less than those evaluated for the proposed General Plan Update. However, due to existing high noise levels along major roadways, impacts would remain significant.

### ***Population, Housing, and Employment***

Implementation of Alternative 2 would result in buildout according to the current General Plan, which would develop fewer housing units and less non-residential floor area when compared to the proposed General Plan Update. However, only 1,071 units over the existing housing stock can be accommodated by the current Land Use Map, and the total future housing needs of 2,149 units under the RHNA would not be met by this alternative. As with the proposed General Plan Update, impacts on population, housing, and employment would be less than significant.

### ***Public Services***

Alternative 2 would generate additional demand for public services from future development; however, this demand would be less than those anticipated for the proposed General Plan Update due to the smaller buildout capacity. Despite the reduced demand, both Alternative 2

and the proposed General Plan Update would result in less than significant impacts related to public services.

### ***Recreation***

Alternative 2 would have less impact on recreation since buildout under the existing General Plan would result in a lower resident population in the City than the proposed General Plan Update. This impact is less than the impact of the proposed General Plan Update and less than significant.

### ***Transportation and Traffic***

Buildout of Alternative 2 would result in fewer vehicle trips at buildout than the proposed General Plan Update due to the lower development capacity. Therefore, traffic-related impacts are expected to be less than those evaluated for the proposed General Plan Update. However, under both scenarios, traffic impacts could be significant and unavoidable.

### ***Utilities and Service Systems***

Alternative 2 would generate additional demands for utility services; however, this demand would be less than those anticipated for the proposed General Plan Update due to the lower development capacity under the current Land Use Map. Despite the reduced demand, both Alternative 2 and the proposed General Plan Update would result in less than significant impacts related to utilities with mitigation.

### ***GHG Emissions***

Alternative 2 would generate GHGs from future development in the City and its SOI, similar to the proposed General Plan Update. However, the existing General Plan does not include goals and policies for sustainable development and energy conservation. With implementation of the same mitigation measures, impacts of the current General Plan are anticipated to be greater, with significant and unavoidable cumulative impacts related to global warming.

### **Conclusion**

Continued implementation of the current General Plan, as anticipated under Alternative 2, would create significant and unavoidable adverse impacts, including increases in pollutant emissions, noise, traffic volumes, and GHG emissions. However, these impacts would be less than those expected under the proposed General Plan Update due to the lower development capacity of the current Land Use Map. Also, this alternative would not result in an inconsistency with the projections used in the AQMP for the South Coast Air Basin but would still contribute to existing air quality violations. This alternative would have the same impacts on agricultural resources, cultural resources, and land use and planning as the proposed General Plan Update. For the remaining environmental issues, Alternative 2 would result in fewer impacts than the proposed General Plan Update.

Alternative 2 would meet most of the objectives of the City as outlined in Section 5.1.2, except for addressing the needs of the existing resident population and current regional issues. Also, this alternative does not include goals and policies for sustainability and energy conservation that would reduce GHG emissions from future development under the proposed Land Use Policy Map and from public and infrastructure projects. In addition, due to the current Land Use Map's lower development capacity, the total future housing needs of the City (set at 2,149 units

under the RHNA) would not be met by this alternative. The Public designation of open space resources in the City would also not prevent future development on these areas and could lead to disturbance, destruction, and removal of sensitive biological resources.

### **5.3.3 ALTERNATIVE 3: REDUCED COMMERCIAL ALTERNATIVE**

Alternative 3 assumes that an alternate Land Use Policy Map would be adopted as part of the proposed General Plan Update. Specifically, this alternative was developed to reduce the significant and unavoidable impacts associated with the proposed General Plan Update. This would essentially be made through a reduction in the allowable development intensity for the Commercial land use designation within the Downtown overlay in the Land Use Policy Map, rather than changes in the land use designations of specific parcels.

#### **Description of the Alternative**

Alternative 3 proposes an update to the current General Plan that would be accompanied by a revised Land Use Policy Map. This alternative would also promote the preservation of existing residential areas in the City, but provides a more conservative outlook at future development. This alternative decreases the allowable FAR in the Commercial areas within the Downtown overlay from 1.0 to 0.50, except on Huntington Drive between Santa Anita Avenue and Second Avenue. This may also be accomplished by the elimination of the Downtown overlay for areas west of Santa Anita Avenue and along Santa Anita Avenue, except for the parcels at the intersection of Huntington Drive and Santa Anita Avenue. Exhibit 5-1, Reduced Commercial Alternative, shows the area that would be subject to decreases in land use development intensity under this alternative.

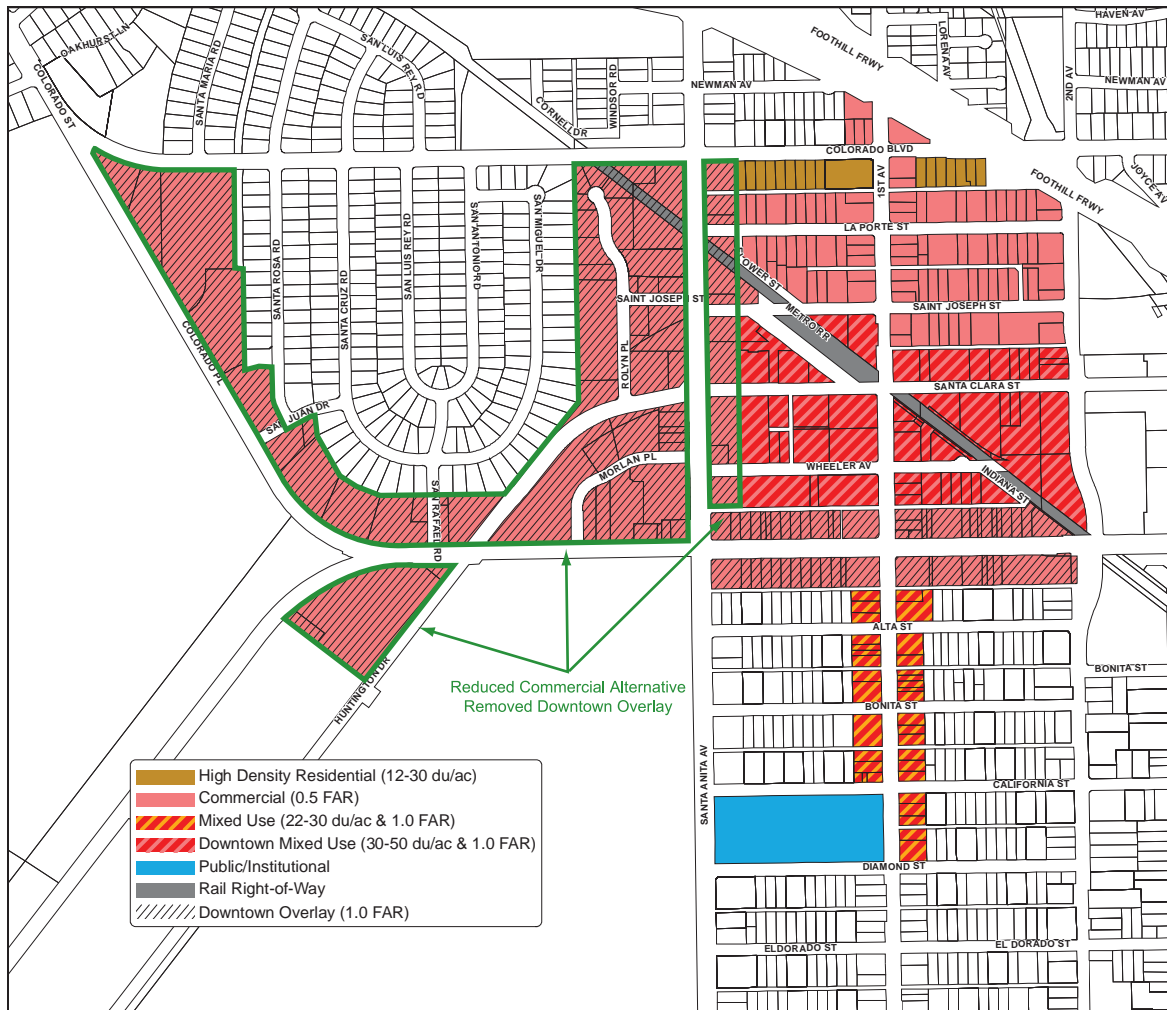
This alternative would include the retention of the same allowable residential densities in the City's residential areas, Downtown Mixed Use, and Mixed Use areas as the proposed Land Use Policy Map. Commercial, Regional Commercial, and Industrial areas would be allowed to develop at a maximum FAR 0.5 and Public Facilities, Open Space - Outdoor Recreation, and Open Space - Resource Protection would also be designated as in the proposed General Plan Update.

The same goals, policies, and implementation actions in the proposed General Plan Update would be part of this alternative, and mitigation provided in Section 4.0, Environmental Analysis, of this EIR would also be implemented.

#### **Comparative Analysis of Environmental Impacts**

##### ***Aesthetics***

Alternative 3 would allow future development in the City, with lower intensities in some Commercial areas through the elimination of their Downtown overlay. New development in the rest of the City will be the same as allowed under the proposed General Plan Update, including the introduction of new sources of light and glare. With the potential for preservation of existing land uses or smaller and lower structures in these areas of the City, visual changes would be less and the impact of this alternative on aesthetics would be less than the impact of the proposed General Plan Update and would be less than significant.



Source: Hogle-Ireland, Inc. 2010

## Reduced Commercial Alternative

## Exhibit 5-1

Arcadia General Plan Update



**Bonterra**  
CONSULTING

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### ***Agriculture and Forest Resources***

Alternative 3 would not result in any impacts to agricultural resources since no agricultural lands or uses or uses are present in the City. No impacts related to the loss of Important Farmland would occur. With the same development density allowed at the northern end of the City under this alternative and the proposed General Plan Update and with the distance separation to adjacent forest land to the north, no impacts to forest land would occur. The impact of this alternative on agriculture and forest resources would be the same as the impact of the proposed General Plan Update.

### ***Air Quality***

Alternative 3 would reduce development potential in some Commercial areas through the elimination of their Downtown Overlay. Thus, less development would occur in the City and its SOI at buildout. This translates to less pollutant emissions from both mobile and stationary sources. The impact of this alternative on air quality would be less than the impact of the proposed General Plan Update. However, impacts would remain significant and unavoidable due to inconsistency with the AQMP and due to potential contributions to existing air quality violations.

### ***Biological Resources***

Alternative 3 would have the same impact on biological resources as the proposed General Plan Update, since the same areas would be developed, even if at lower intensities. The impact of this alternative on biological resources would be the same as the impact of the proposed General Plan Update and would be less than significant with mitigation.

### ***Cultural Resources***

Under Alternative 3, impacts to historic, archaeological, and paleontological resources would occur throughout the City due to future development. Impacts on historic resources would occur from the transition of existing land uses throughout the City and impacts on unknown archaeological and paleontological resources may occur with development at the northern section. But with lower allowable development intensities, fewer transitions in existing land uses may occur, reducing the potential for demolition or rehabilitation of historic resources and avoiding the need to disturb underlying native soils (which may contain fossil resources) to accommodate higher intensity developments. The impact of this alternative on cultural resources would be less than the impact of the proposed General Plan Update and would be less than significant with mitigation.

### ***Geology and Soils***

With lower allowable development intensities, fewer transitions in existing land uses may occur, resulting in less disturbances of the existing topography and less exposure to geologic and seismic hazards in the City. The impact of this alternative on geology and soils would be less than the impact of the proposed General Plan Update and would be less than significant.

### ***Hazards and Hazardous Materials***

The potential for industrial development under this alternative would be the same as the proposed General Plan Update. However, less commercial development would occur under this alternative due to lower allowable intensities in some Commercial areas through the elimination

of their Downtown overlay. Thus, a potential decrease in hazardous material users could occur in the City. The impact of this alternative on hazards and hazardous materials would be less than the impact of the proposed General Plan Update and would be less than significant.

### ***Hydrology and Water Quality***

Alternative 3 would allow future development in the City, with lower intensities in some Commercial areas through the elimination of their Downtown overlay. With less intensive development allowed in the City than that allowed by the proposed General Plan Update, changes in existing hydrology patterns and storm water pollutant sources would be less than the impacts of the proposed General Plan Update. This alternative assumes that future development would comply with standard conditions for hydrology and water quality and impacts would be less than significant, similar to the proposed General Plan. The impact of this alternative on hydrology and water quality would be less than the impact of the proposed General Plan Update and would be less than significant.

### ***Land Use and Planning***

Alternative 3 proposes the same mix of land uses in the City at buildout as the proposed General Plan Update. However, less commercial development would occur under this alternative due to the lower allowable intensity in some Commercial areas through the elimination of their Downtown overlay. This difference does not change the level of impact between Alternative 3 and the proposed General Plan Update, and impacts would be less than significant.

### ***Mineral Resources***

Alternative 3 would reduce the development capacity of the City at buildout, resulting in a lesser demand for aggregate resources. The impact of this alternative on mineral resources would be less than the impact of the proposed General Plan Update and would be less than significant.

### ***Noise***

This alternative would reduce development capacity of the City at buildout, resulting in less commercial development (and less associated noise from vehicle trips and stationary equipment). The impact of this alternative on noise would be less than the impact of the proposed General Plan Update. However, due to existing high noise levels along major roadways in the City, impacts would remain significant and unavoidable.

### ***Population, Housing, and Employment***

With lower development intensities in some Commercial areas through the elimination of their Downtown overlay, a decrease in the employment base of the City at buildout could be expected under this alternative. With the same housing capacity, future housing allocations under the RHNA would be met under this alternative. The impact of this alternative on employment would be less beneficial than the impact of the proposed General Plan Update.

### ***Public Services***

Alternative 3 would generate additional demand for public services; however, this demand would be less than those anticipated for the proposed General Plan Update due to less commercial development at buildout. Despite the reduced demand, both Alternative 3 and the



proposed General Plan Update would result in less than significant impacts related to public services. The impact of this alternative on public services would be less than the impact of the proposed General Plan Update.

### ***Recreation***

Alternative 3 would allow the same residential densities as the proposed General Plan Update. Thus, it would have the same impact on recreation since buildout under Alternative 3 would result in the same resident population in the City as buildout under the proposed General Plan Update. The impact of this alternative on recreation would be the same as the impact of the proposed General Plan Update and would be less than significant.

### ***Transportation and Traffic***

With less development capacity than the proposed General Plan Update, fewer vehicle trips would be generated at buildout of this alternative. This would result in less congestion on area streets and intersections. The impact of this alternative on traffic and circulation would be less than the impact of the proposed General Plan Update. However, under both scenarios, traffic impacts would be significant and unavoidable.

### ***Utilities and Service Systems***

Alternative 3 would generate additional demand for utility services; however, this demand would be less than those anticipated for the proposed General Plan Update due to the reduction in commercial development at buildout. Despite the reduced demand, both Alternative 3 and the proposed General Plan Update would result in less than significant impacts related to utilities. The impact of this alternative on utilities would be less than the impact of the proposed General Plan Update. Impacts would also be less than significant with mitigation.

### ***GHG Emissions***

With less commercial development capacity than the proposed General Plan Update, less greenhouse gas emissions would be generated at buildout of this alternative. This alternative also assumes that the goals, policies, and implementation actions for sustainability and energy and water conservation would be adopted by the City (as proposed in the General Plan Update), resulting in a lower contribution to global warming. The impact of this alternative on global warming would be less than the impact of the proposed General Plan Update. However, future development would still generate GHG emissions; and this impact would be significant and unavoidable.

### **Conclusion**

Implementation of Alternative 3 would reduce environmental impacts related to aesthetics, cultural resources, geology and soils, and hydrology. In addition, the decrease in development capacity would reduce demand-driven impacts related to traffic, air pollutant emissions, noise, public service demands, utility demands, and GHG emissions. The reduction in commercial development would also reduce potential hazardous material users in the City.

Alternative 3 would result in fewer environmental impacts or impacts with less intensity than the proposed General Plan Update on most environmental issues and would avoid and reduce the significant and unavoidable adverse impacts from the proposed General Plan Update. Since this alternative would include the adoption of the goals, policies, and implementation actions of the

proposed General Plan Update and would comply with the standard conditions and mitigation measures called out in Section 4.0, Environmental Analysis, of this EIR, it would generally meet the objectives of the proposed General Plan Update and reduce its environmental impacts on biological resources, cultural resources, geology and soils, and utilities to less than significant levels. Impacts would also be reduced in terms of air quality, noise, traffic, and GHG emissions but not to less than significant levels.

However, this alternative does not represent the mix of land uses and development that the residents, stakeholders, City staff, and leaders envisioned at buildout of the City and its SOI. It would not encourage redevelopment and revitalization of the downtown area and near the proposed Gold Line station. Also, future development under the Reduced Commercial Alternative would still contribute existing air quality and noise violations, traffic congestion, and GHG emissions, which would remain significant and unavoidable. Thus, it would have the same significant unavoidable impacts as the proposed General Plan Update.

#### **5.3.4 ALTERNATIVE 4: EXPANDED DOWNTOWN FOCUS AREA**

Like Alternative 3, Alternative 4 also addresses an alternate Land Use Policy Map to the proposed General Plan Update. However, this alternative would expand the Downtown Mixed Use designation to include the half-block between First and Second Avenues south of St. Joseph Avenue.

##### **Description of the Alternative**

Alternative 4 proposes an update to the current General Plan that would be accompanied by a slight revision to the Land Use Policy Map in the proposed General Plan Update. This alternative would still preserve existing residential areas in the City, as well as promote the transition of existing land uses in the same eight focus areas but expands the Downtown Mixed Use designation to include 10 additional parcels along St. Joseph Avenue. Exhibit 5-2 shows parcels that would be redesignated Downtown Mixed Use. These 10 parcels over approximately 3.22 acres of land, which are currently developed with a mix of residential, commercial and industrial uses and vacant land.

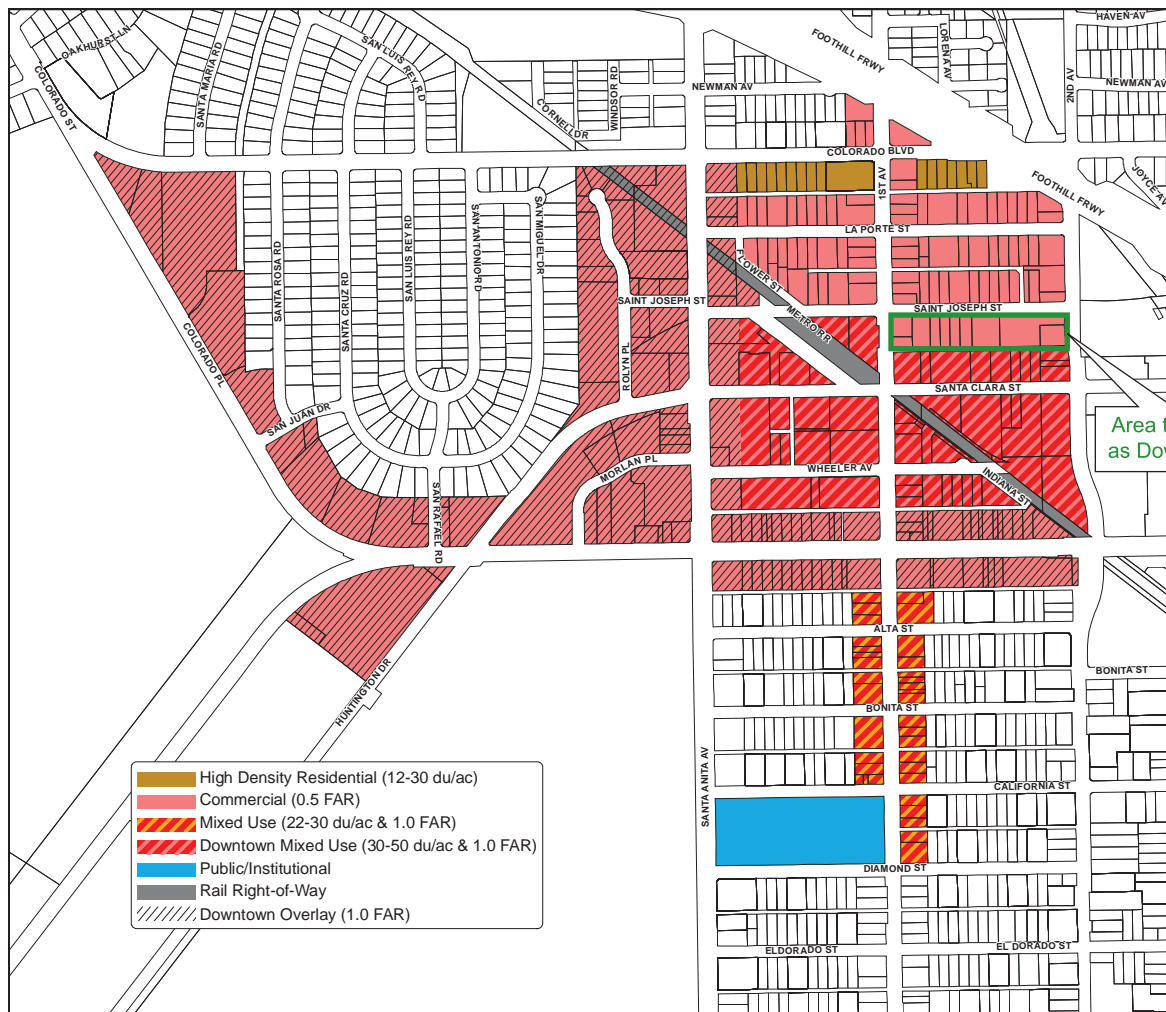
This alternative proposes a Downtown Mixed Use designation for the ten parcels, with an allowable FAR of 1.0 and a residential density of 30 to 50 du/acre. This area is currently designated as Industrial (with an allowable FAR of 0.45) and is proposed to be designated as Commercial (with an allowable FAR of 0.5) in the proposed General Plan Update. With the Downtown Mixed Use designation under this alternative, an increase in commercial and residential development could occur on these 10 parcels. With an assumed ratio of residential to non-residential development of 40 to 60 percent, respectively, this alternative would lead to the loss of industrial development but an increase in commercial floor area and residential units.

The same goals, policies and implementation actions in the proposed General Plan Update would be part of this alternative and mitigation developed in Section 4.0, Environmental Analysis, of this EIR would also be implemented.

##### **Comparative Analysis of Environmental Impacts**

###### ***Aesthetics***

Alternative 4 would allow future development in the City, with higher intensity development on ten parcels in the Downtown area. New development in the rest of the City will be the same as



Area to be redesignated as Downtown Mixed Use

Source: Hogle-Ireland, Inc. 2010

## Expanded Downtown Focus Area

## Exhibit 5-2

Arcadia General Plan Update



**Bonterra**  
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allowed under the proposed General Plan Update, including the introduction of new sources of light and glare. The existing mix of land use types, densities and age of structures in this area would be replaced with newer, larger and higher structures on these ten parcels. Due to the subjective nature of aesthetics, the level of impact between Alternative 4 and the proposed General Plan would be the same and would be less than significant.

### ***Agriculture and Forest Resources***

Alternative 4 would not result in any impacts to agricultural resources since no agricultural lands or uses or uses are present in the City. No impacts related to the loss of Important Farmland would occur. With the same development density at the northern end of the City under this alternative and the proposed General Plan Update and with the distance separation to adjacent forest land to the north, no impacts to forest land would occur. As with the proposed General Plan Update, there would be no impact to agricultural uses.

### ***Air Quality***

Alternative 4 would increase development potential in the downtown area. Thus, more development would occur in the City and SOI at buildout. This translates to more pollutant emissions from both mobile and stationary sources. However, the elimination of industrial uses would reduce impacts associated with stationary sources of pollutants. Also, future mixed use developments on this area would promote greater pedestrian and transit uses that would reduce vehicle trips and associated emissions. Thus, the impact of this alternative on air quality could be less than the impact of the proposed General Plan Update. However, impacts would be significant and unavoidable due to inconsistency with the AQMP and due to potential contributions to existing air quality violations.

### ***Biological Resources***

Alternative 4 would have the same impact on biological resources as the proposed General Plan Update, since the same areas would be developed, even if at higher intensities on ten parcels. The impact of this alternative on biological resources would be the same as the impact of the proposed General Plan Update and would be less than significant with mitigation.

### ***Cultural Resources***

Under Alternative 4, impacts to historic, archaeological and paleontological resources would occur throughout the City due to future development. Impacts on historic resources would occur from the transition of existing land uses throughout the City and impacts on unknown archaeological and paleontological resources may occur with development at the northern section. With the same potential for the transition of existing developments on these ten parcels, the potential for demolition or rehabilitation of historic resources is the same. The impact of this alternative on cultural resources could be the same as the impact of the proposed General Plan Update but would be less than significant with mitigation.

### ***Geology and Soils***

With a slightly more development potential in the City, more transitions in existing land uses may occur, resulting in more disturbance of the existing topography and more exposure to geologic and seismic hazards in the City. However, the ten parcels are highly disturbed and the impact of this alternative on geology and soils would be the same as the impact of the proposed General Plan Update and would be less than significant.

### ***Hazards and Hazardous Materials***

The potential for industrial development under this alternative would be the same as the proposed General Plan Update. However, the loss of existing industrial development would occur under this alternative due to the transition of existing industrial uses to commercial and residential development in downtown. Thus, a potential decrease in hazardous material users could occur in the City with the transition away from industrial uses. The impact of this alternative on hazard and hazardous materials would be less than the impact of the proposed General Plan Update and would be less than significant.

### ***Hydrology and Water Quality***

Alternative 4 would allow future development in the City, with higher development potential on ten parcels in the downtown area. With the same area developed, changes in existing hydrology patterns would be the same. With the elimination of industrial uses, storm water pollutant sources would also be reduced. This alternative also assumes that future mixed use development would comply with standard conditions for hydrology and water quality and impacts would be less than significant. The impact of this alternative on hydrology and water quality would be less than the impact of the proposed General Plan Update and would be less than significant.

### ***Land Use and Planning***

Alternative 4 proposes the same mix of land uses in the City at buildout as the proposed General Plan, except for ten parcels where more commercial and residential development would occur under this alternative due to the change in designation from Commercial to Downtown Mixed Use. This difference does not change the level of impact between Alternative 4 and the proposed General Plan; impacts would be less than significant.

### ***Mineral Resources***

Alternative 4 would increase the development capacity of the City at buildout, resulting in a greater demand for aggregate resources. The impact of this alternative on mineral resources would be greater than the impact of the proposed General Plan Update but would be less than significant.

### ***Noise***

This alternative would increase the development capacity of the City at projected buildout, resulting in less industrial development and more commercial and residential development (and their associated noise from vehicle trips and stationary equipment). A reduction in stationary noise impacts would occur, with an increase in vehicle traffic noise. Since increases in vehicle noise levels would not be perceptible, the impact of this alternative on noise from stationary sources would be less than the impact of the proposed General Plan Update. However, due to existing high noise levels along major roadways in the City, noise impacts would remain significant and unavoidable.

### ***Population, Housing, and Employment***

With slightly higher development capacity in the downtown area, an increase in the employment base of the City at buildout could be expected under this alternative. With an increase in housing capacity, future housing allocations under RHNA would be met under this alternative.

The impact of this alternative on population, housing, and employment would be more beneficial than the impact of the proposed General Plan Update.

### ***Public Services***

Alternative 4 would generate additional demand for public services; this demand would be greater than anticipated for the proposed General Plan Update due to more commercial and residential development at buildout. Despite the increased demand, both Alternative 4 and the proposed General Plan Update would result in less than significant impacts related to public services. The impact of this alternative on public services would be greater than the impact of the proposed General Plan Update.

### ***Recreation***

Alternative 4 would increase residential development over that allowed by the proposed General Plan Update. Thus, it would have a greater impact on recreation since buildout under this alternative would result in a larger resident population in the City than buildout under the proposed General Plan Update. The impact of this alternative on recreation would be greater than the impact of the proposed General Plan Update but would be less than significant.

### ***Transportation and Traffic***

With more development capacity than the proposed General Plan, more vehicle trips would be generated at buildout of this alternative. This would result in greater congestion on area streets and intersections. However, the increased density that would be allowed under the proposed Downtown Mixed Use designation is in accord with the State emphasis on transit-oriented development (TOD) to promote greater transit use. The impact of this alternative on traffic and circulation would be greater than the impact of the proposed General Plan Update. Also, under both scenarios, traffic impacts would be significant and unavoidable.

### ***Utilities and Service Systems***

Alternative 4 would generate additional demand for utility services; and this demand would be greater than those anticipated for the proposed General Plan Update due to the increase in commercial and residential development on those ten parcels. Despite the increased demand, both Alternative 4 and the proposed General Plan Update would result in less than significant impacts related to utilities. The impact of this alternative on utilities would be greater than the impact of the proposed General Plan Update. Impacts would also be less than significant with mitigation.

### ***GHG Emissions***

With more commercial and residential development capacity than the proposed General Plan, more GHG emissions would be generated at buildout of this alternative. However, future mixed use development would encourage pedestrian and transit uses, reducing GHG emissions from transportation sources. This alternative also assumes that the goals, policies and implementation actions for sustainability and energy and water conservation would be adopted by the City (as proposed in the General Plan Update), resulting in a lower contribution to global warming. The impact of this alternative on global warming would be less than the impact of the proposed General Plan Update. However, since future development would contribute GHG emissions that could lead to global warming, this impact would be significant and unavoidable.

## **Conclusion**

Implementation of Alternative 4 would lead to environmental changes associated with future development but the increase the development capacity on ten parcels would increase impacts related to traffic, public service demands, and utility demands when compared to the proposed General Plan Update. The reduction in existing industrial development would reduce potential hazardous material users, stationary emissions, stationary noise sources, and storm water pollutant sources in the City. Also, future mixed use development could reduce vehicle trip generation and associated vehicle and GHG emissions that would otherwise accompany industrial or commercial uses.

Alternative 4 would result in greater environmental impacts than the proposed General Plan Update on some environmental issues or less impacts on other issue areas due to the potential transition of land uses on ten parcels along St Joseph Avenue to mixed use developments. Since this alternative would include the adoption of the goals, policies, and implementation actions of the proposed General Plan Update and would comply with the standard conditions and mitigation measures called out in Section 4.0, Environmental Analysis, of this EIR, it would generally meet the objectives of the proposed General Plan Update. Although impacts on air quality, noise, traffic, and GHG emissions would be less than those of the proposed General Plan Update, they would still be significant and unavoidable, as expected with the proposed General Plan Update.

## **5.4 ENVIRONMENTALLY SUPERIOR ALTERNATIVE**

CEQA requires the identification of an environmentally superior alternative. Section 15126.6(e)(2) of the CEQA Guidelines states that if the No Project Alternative is the environmentally superior alternative, then the EIR shall also identify an environmentally superior alternative among the other alternatives.

The environmental analysis of alternatives above indicates that, through a comparison of potential impacts from each of the alternatives and the proposed Arcadia General Plan Update, the No Project/No Development Alternative or Alternative 1 would be considered environmentally superior because no new environmental changes would be introduced to the City and its SOI. However, this alternative would not meet any of the objectives for the comprehensive update of the General Plan and would not incorporate new goals and policies to address the needs of the existing resident population nor address current regional issues on GHG emission reductions and sustainability.

Aside from the No Project/No Development Alternative, Alternative 2 or the No Project/Existing General Plan Alternative would also be considered environmentally superior. This alternative would result in less development in the City at buildout, with the lower residential development density for High Density Residential Areas and Mixed Use areas (24 units per acre) and the lower allowable FAR for Industrial and Mixed Use areas. This alternative would reduce significant and unavoidable impacts related to pollutant emissions contribution to existing violations, AQMP inconsistency, traffic volume and noise increases on major streets, and GHG emissions. Alternative 2 represents the environmentally superior alternative because these significant and unavoidable impacts associated with the proposed General Plan Update would be reduced. However, Alternative 2 would not completely avoid or reduce these impacts to less than significant levels. Impacts on air quality, noise, transportation, and GHG emissions would still remain significant and unavoidable, similar to the proposed General Plan Update.

As discussed earlier, the No Project/Existing General Plan Alternative does not address the needs of the existing resident population and current regional issues. Also, this alternative does not include goals and policies for sustainability and energy conservation that would reduce greenhouse gas emissions from future development under the proposed Land Use Policy Map and from public and infrastructure projects. The current Land Use Map's lower development capacity would also not accommodate the total future housing needs of the City, as allocated by the RHNA. In addition, the current Public designation of open space resources in the City would not prevent future development on these areas and could lead to disturbance, destruction, and removal of sensitive biological resources. Thus, it does not respond to the objectives of the City to the same degree as the proposed General Plan Update.

Aside from the No Project Alternatives (Alternatives 1 and 2) and among the other alternatives that would involve an update of the City's current General Plan, the Reduced Commercial Alternative (Alternative 3) would have less impacts than the Expanded Downtown Focus Area (Alternative 4) or the proposed General Plan Update. This is because implementation of Alternative 3 would reduce environmental impacts related to aesthetics, cultural resources, geology and soils, hydrology, traffic, air pollutant emissions, noise, public service demands, utility demands, and GHG emissions, and hazards. The reduction in impacts is largely due to the decrease in commercial development capacity in the City.

Alternative 3 would result in fewer environmental impacts or impacts with less intensity than the proposed General Plan Update on most environmental issues and would reduce the significant and unavoidable adverse impacts from the proposed General Plan Update. It would also generally meet the objectives of the proposed General Plan Update. However, future development under the Reduced Commercial Alternative would still contribute existing air quality and noise violations, traffic congestion, and GHG emissions, which would remain significant and unavoidable. Thus, it would have the same significant unavoidable impacts as the proposed General Plan Update.