

SECTION 7.0 ALTERNATIVES TO THE PROPOSED PROJECT

7.1 INTRODUCTION

Sections 15126.6(a) and (b) of the State CEQA Guidelines (14 *California Code of Regulations* [CCR]) provide guidance on the scope of alternatives to a proposed project that must be evaluated. The State CEQA Guidelines state:

- (a) Alternatives to the Proposed Project. 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, which 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.
- (b) Purpose. Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code §21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.

In selecting alternatives to the Newport Banning Ranch Project (proposed Project or Project), the City of Newport Beach (City), as lead agency, is to consider alternatives that could feasibly attain most of the basic objectives of the Project and avoid or substantially lessen one or more of the significant effects.

7.2 SUMMARY OF THE PROPOSED PROJECT

The proposed Project would allow for the development of the 401.1-acre operating oilfield with residential, commercial, resort inn, recreational, and open space uses. Because the Project site is an active oilfield, remediation is required in order to implement the proposed development Project. The Project proposes 1,375 residential dwelling units (du), 75,000 square feet (sf) of commercial uses, and a 75-room resort inn. Approximately 51.4 gross acres are proposed for active and passive park uses. Approximately 252 acres (approximately 63 percent) of the Project site are proposed for natural resources protection in the form of open space and habitat restoration. Of the 252 acres, approximately 16.5 acres would be used for the consolidation of oil facility operations in two locations. Once oil operations are completed in the future, the 16.5 acres would be remediated and restored for open space use.

The proposed Project includes a vehicular and a non-vehicular circulation system. Roadways would be extended through the Project site to provide a north-south connection from West Coast Highway to 19th Street; additional roadway connections would be provided at 15th Street,

16th Street, and 17th Street. These roadways are depicted on the City's Master Plan of Streets and Highways.

7.3 CRITERIA FOR SELECTING ALTERNATIVES

Several criteria were used to select alternatives to the proposed Project. These criteria are described below.

7.3.1 ABILITY TO ACHIEVE PROJECT OBJECTIVES

Section 15126.6(f) of the State CEQA Guidelines (14 CCR) states:

The range of alternatives required in an EIR is governed by a 'rule of reason' that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project.

For purposes of the alternative analysis, each alternative assessed in this EIR was evaluated to determine the extent to which it could attain the basic objectives set forth by the Applicant for the proposed Project, which are as follows:

1. Provide a Project that implements the goals and policies that the Newport Beach General Plan has established for the Banning Ranch area.
2. Preservation of a minimum of 50 percent of the Project site as open space without the use of public funds to be used for habitat conservation, interpretive trails, and development of public parks to meet the recreational needs of the community.
3. Development of a residential village of up to 1,375 residential units, offering a variety of housing types in a range of housing prices, including the provision of affordable housing to help meet the City's Regional Housing Needs Assessment (RHNA).
4. Development of up to 75 overnight accommodations in a small resort inn including ancillary facilities and services such as a spa, meeting rooms, shops, bars, and restaurants that would be open to the public.
5. Development of up to 75,000 square feet of retail commercial uses oriented to serve the needs of local residents and visitors utilizing the resort inn and the coastal recreational opportunities provided as part of the Project.
6. Development of a land use plan that (1) provides a comprehensive design for the community that creates cohesive neighborhoods promoting a sense of identity with a simple and understandable pattern of streets, a system of pedestrian walkways and bikeways that connect residential neighborhoods, commercial uses, parks, open space and resort uses; (2) reduces overall vehicle miles travelled; (3) integrates landscaping that is compatible with the surrounding open space/habitat areas and that enhances the pedestrian experience within residential areas; and (4) applies architectural design criteria to orient residential buildings to the streets and walkways in a manner that enhances the streetscape scene.

7. Provide for roadway improvements to improve and enhance regional circulation, minimize impacts of Project development on the existing circulation system, and enhance public access while not developing more roadways than are needed for adequate regional circulation and coastal access.
8. Provide enhanced public access in the Coastal Zone through a system of pedestrian walkways, multi-use trails, and on-street bikeways designed to encourage walking and biking as an alternative to the use of automobiles by providing connectivity among residential, commercial, park, open space, and resort uses within the Project site and to existing adjacent open space, hiking and biking trails, the beach, and the Pacific Ocean.
9. Provide for the consolidation of oil resource extraction and related recovery operations in locations that minimize impacts to sensitive habitat areas and promote compatibility with development of the remainder of the property for residential, resort, commercial, park, and open space uses.
10. Provide for the restoration and permanent preservation of habitat areas through implementation of a Habitat Restoration Plan (HRP) for the habitat conservation, restoration, and mitigation areas ("Habitat Areas") as depicted on the Master Development Plan.
11. Provide for long-term preservation and management of the Habitat Areas through the establishment of a conservation easement or deed restriction and the creation of an endowment or other funding program.
12. Expand public recreational opportunities within the Coastal Zone through development of a public community park and associated parking, and through development of publicly accessible bluff parks, interpretive parks, and trails as part of the Project.
13. Improve the existing arroyo drainage courses located within the Project site to provide for higher quality habitat conditions than exist prior to the time of Project implementation.
14. Implement a Water Quality Management Program within the Project site that will utilize existing natural treatment systems and that will improve the quality of urban runoff from off-site and on-site sources prior to discharging into the Santa Ana River and the Semeniuk Slough.
15. Implement fire protection management solutions designed to protect development areas from fire hazards, to preserve sensitive habitat areas, and to create fire-resistant habitat restoration areas within currently denuded, invasive-species laden, and/or otherwise degraded areas.
16. Provide compatibility between the Project and existing adjacent land uses.

The ability of each potential alternative to attain most of these objectives was one criterion for selection and evaluation in this EIR.

7.3.2 ELIMINATION/REDUCTION OF SIGNIFICANT IMPACTS

Section 15126.6(b) of the State CEQA Guidelines (14 CCR) states that "Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code Section 21002.1), the discussion of alternatives shall

focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly”.

Therefore, the alternatives evaluated in this EIR have been selected because they are anticipated to reduce and/or eliminate one or more significant impacts associated with the proposed Project. Potentially significant environmental impacts that would result from the Project are evaluated in Sections 4.1 through 4.15 and Section 6.0 of this EIR. With implementation of the respective Project Design Features (PDFs), standard conditions and requirements (SCs), and mitigation measures (MMs) identified for each topical issue, many of the potentially significant impacts resulting from the Project would be reduced to a level considered less than significant. The proposed Project impacts listed below would remain significant and unavoidable even after mitigation.

Land Use and Related Planning Programs

- There would be a land use incompatibility with respect to night illumination associated with the Community Park and long-term noise impacts on those Newport Crest residences immediately contiguous to the Project site. In addition, there would be a potential long-range noise impacts for residents on 17th Street west of Monrovia Avenue. For noise, although mitigation is proposed, noise impacts would remain significant if the affected residents of Newport Crest elect not to implement the mitigation measures to reduce the increased interior noise levels and if the City of Costa Mesa does not implement the recommended measure of resurfacing the street with rubberized asphalt (Threshold 4.1-1).

Aesthetic and Visual Resources

- The proposed Project would include a “dark sky” lighting regulations in the NBR-PC that would apply to businesses (e.g., resort inn and neighborhood commercial uses) and Homeowners Association-owned and operated land uses within 100 feet of the Open Space Preserve.. However, the Project would introduce nighttime lighting into a currently unlit area. The Community Park is anticipated to have night lighting of active sports fields, which could result in light spillover onto adjacent properties. The Project would result in night lighting impacts that are considered significant and unavoidable. The City of Newport Beach General Plan Final EIR found that the introduction of new sources of lighting associated with development of the site would be considered significant and unavoidable. In certifying the General Plan Final EIR and approving the General Plan project, the City Council approved a Statement of Overriding Considerations, which notes that there are specific economic, social, and other public benefits that outweigh the significant and unavoidable impacts associated with the General Plan project (Threshold 4.2-3).

Transportation and Traffic

The Project would have impacts on intersections in the City of Costa Mesa. Implementation of MM 4.9-2 would mitigate the Project’s impact to a level considered less than significant. However, the City of Newport Beach cannot impose mitigation on another jurisdiction. Therefore, if the Applicant is unable to reach an agreement with the City of Costa Mesa that would ensure that Project impacts occurring in Costa Mesa would be mitigated concurrent with or preceding the impact, for purposes of this EIR, the impacts to be mitigated by the improvements would remain significant and unavoidable.

Pursuant to Threshold 4.9-2, the following impacts were identified with the various traffic scenarios evaluated:

- *Existing Plus Project*. Intersections identified as deficient are: (1) Newport Boulevard at Harbor Boulevard; (2) Newport Boulevard at 18th Street/ Rochester Street; and (3) Superior Ave/17th Street. (This scenario assumes all development occurs at once, which is not an accurate reflection the timing for development of the proposed Project.)
- *Year 2016 With Project Transportation Phasing Ordinance (TPO)*. Intersections identified as deficient are: (1) Monrovia Avenue and 19th Street; (2) Newport Boulevard and 19th Street; (3) Newport Boulevard and Harbor Boulevard; (4) Newport Boulevard at 18th Street/Rochester Street; (5) Pomona Avenue and 17th Street; (6) Newport Boulevard at 17th Street; (7) Superior Avenue and 17th Street; and (8) Newport Boulevard and West Coast Highway.
- *Year 2016 With Phase 1 Project TPO*. Intersections identified as deficient are: (1) Newport Boulevard and Harbor Boulevard; (2) Newport Boulevard at 18th Street/Rochester Street; and (3) Newport Boulevard and West Coast Highway.
- *Year 2016 Cumulative With Project*. Intersections identified as deficient are: (1) Monrovia Avenue and 19th Street; (2) Newport Boulevard and 19th Street; (3) Newport Boulevard and Harbor Boulevard; (4) Newport Boulevard at 18th Street/Rochester Street; (5) Pomona Avenue and 17th Street; (6) Newport Boulevard at 17th Street¹; (7) Superior Avenue and 17th Street; and (8) Newport Boulevard and West Coast Highway.
- *Year 2016 Cumulative With Phase 1 Project*. Intersections identified as deficient are: (1) Newport Boulevard at Harbor Boulevard and (2) Newport Boulevard at 18th Street/Rochester Street.
- *General Plan Buildout with Project*. Intersections identified as deficient are: (1) Newport Boulevard at Harbor Boulevard and (2) Newport Boulevard at 19th Street.

Air Quality

- Without mitigation, regional (mass) emissions of nitrogen oxides (NO_x) are forecasted to exceed applicable thresholds in some construction years. Though MM 4.10-1 would reduce the emissions to less than significant, the availability of sufficient Tier 4 diesel engine construction equipment cannot be assured. Therefore, for purposes of this EIR, the impacts are found to be significant and unavoidable impact (Threshold 4.10-2).
- Long-term operational emissions of criteria pollutants would not exceed the SCAQMD mass emissions thresholds from initial occupancy through 2020. However, as Project development continues beyond 2020, emissions of volatile organic compounds (VOCs) and carbon monoxide (CO) would exceed the significance thresholds, principally due to vehicle operations. Therefore, the impacts remain significant and unavoidable (Threshold 4.10-2).
- The Project would have cumulatively considerable contributions to regional pollutant concentrations of ozone (O₃) (Threshold 4.10-3).

¹ The Newport Boulevard and 17th Street intersection has a Project-related impact using the Highway Capacity Manual (Caltrans methodology), as well as an impact using the Intersection Capacity Utilization methodology.

Greenhouse Gas Emissions

- The Project would emit quantities of greenhouse gases (GHGs) that would exceed the City's 6,000 metric tons of carbon dioxide equivalent per year (MTCO₂e/yr) significance threshold. The Project would make a cumulatively considerable contribution to the global GHG inventory affecting global climate change (Threshold 4.11-1).

Noise

- For the *Existing Plus Project, 2016 with Project*, and *General Plan Buildout* scenarios, the increased traffic volumes on 17th Street west of Monrovia Avenue would expose sensitive receptors to noise level increases in excess of the City of Newport Beach's standards for changes to the ambient noise levels. At buildout, noise levels would also exceed significance thresholds in the City of Costa Mesa. MM 4.12-5 requires the Applicant to provide funds to the City of Costa Mesa to resurface the street with rubberized asphalt; however, the City of Newport Beach has no ability to ensuring that the mitigation would be implemented. Therefore, the forecasted impact to residents of 17th Street west of Monrovia Avenue is considered significant and unavoidable (Threshold 4.12-2).
- For portions of the Newport Crest development, there would be a significant increase in the ambient noise level due to the projected traffic volumes in the buildout condition. MM 4.12-6 would reduce impacts to levels within the "Clearly Compatible" or "Normally Compatible" classifications, but would remain above the General Plan's 5 A-weighted decibels (dBA) significance criterion. MM 4.12-7 would provide interior noise attenuation, but because the City of Newport Beach does not have the authority to mandate the implementation of mitigation on private property that is not on the Project site, the impact would be significant and unavoidable (Threshold 4.12-4).
- Use of construction equipment would result in a substantial temporary increase in ambient noise levels to nearby noise-sensitive receptors in the vicinity of the Project. Due to the low existing ambient noise levels, the proximity of the noise-sensitive receptors, and duration of construction activities, the temporary noise increases would be significant and unavoidable (Threshold 4.12-2).

7.3.3 FEASIBILITY

Section 15126.6(f)(1) of the State CEQA Guidelines (14 CCR) states:

Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent). No one of these factors establishes a fixed limit on the scope of reasonable alternatives (*Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553; see *Save Our Residential Environment v. City of West Hollywood* (1992) 9 Cal.App.4th 1745, 1753, fn. 1).

Each alternative was evaluated for its feasibility, its ability to attain most of the proposed Project's objectives, and its ability to reduce and/or eliminate significant impacts associated with the Project.

7.4 DEVELOPMENT ALTERNATIVES CONSIDERED BUT NOT CARRIED FORWARD

The following alternatives have not been carried forward in this EIR because they do not provide any substantial avoidance or minimization of impacts that are not already accommodated in the other alternatives being evaluated. Various alternatives were evaluated as part of the City of Newport Beach General Plan Update process. Since the City of Newport Beach City Council already took action on the General Plan and provided direction on the development concept for the site, the alternatives previously considered as part of the General Plan Update were not carried forward. It should also be noted that the General Plan Update has also been approved by a vote of the residents of the City of Newport Beach. The City's General Plan identifies the Community Park as containing active playfields that may be lighted. The elimination of the night lighting at the Community Park would substantially lessen but not eliminate one of the impacts of the Newport Banning Ranch Project. The remainder of the proposed Project has incorporated a "dark skies" program, which would serve to minimize the night illumination impacts. In certifying the General Plan Update Final EIR and approving the General Plan project, the City Council approved a Statement of Overriding Considerations, which notes that there are specific economic, social, and other public benefits that outweigh the significant and unavoidable impacts associated with the General Plan project. Based on these findings, a policy decision was made on the appropriateness of having night lighting at the Community Park, and an alternative that eliminated the lighting was not carried forward.

The following provides a discussion of other alternatives considered and reasons for not selecting them for further evaluation.

7.4.1 DEVELOPMENT OF THE PROJECT SITE CONSISTENT WITH THE COUNTY OF ORANGE GENERAL PLAN AND ZONING DESIGNATIONS

Of the 401.1-acre Project site, 361 acres are located in unincorporated Orange County. The *County of Orange General Plan's* Land Use Element (adopted February 2000, as amended April 2004), "...contains official County policies on the location and character of land uses necessary for orderly growth and development". The Land Use Element identifies policies and programs in other General Plan elements that affect land use and that provide guidance for future land use planning studies for the unincorporated portion of the County.

The *County of Orange General Plan's* Land Use Element designates the Project site as "Open Space (5)". The County's Land Use Element states, "The Open Space (5) category indicates the current and near-term use of the land, most of which is zoned agricultural. It is not necessarily an indication of long-term commitment to open space uses, except where one of the three overlay categories applies". No overlay category applies to the Project site.

The zoning for the 361 acres of the Project site within County jurisdiction would allow for development of up to 2,510 multi-family du, 225 single-family du, 50,000 sf of general commercial use, 235,600 sf of general office use, and 164,400 sf of industrial uses. Overlay zones, including Oil Production, Sign Restriction, and Floodplain Zone 2, apply to portions of the property. Development of property pursuant to the County zoning would generate approximately 22,075 average daily trips on the circulation network (Newport Beach 2006a, 2006b).

The level of development provided by the County zoning has been assumed in the long-range planning documents, such as the Orange County Projections and the Master Plan of Arterial Highways (MPAH). However, to develop the Project consistent with the County zoning and approvals, a County of Orange General Plan Amendment would be required.

This Alternative was not retained for detailed evaluation in the EIR for many reasons. First, development under this Alternative would not reduce identified impacts of the project in any obvious way. Second, this Alternative use would not achieve these two important project objectives:

- **Objective No. 1:** Provide a Project that implements the goals and policies that the Newport Beach General Plan has established for the Banning Ranch area and
- **Objective No. 16:** Provide compatibility between the Project and existing adjacent land uses.

Finally, such development would not be consistent with the planning policies of the County or the City.

Although the Project site is within the County of Orange's jurisdiction, it has been the County's policy to encourage annexation of unincorporated areas where land has been designated within a local city's Sphere of Influence. The County General Plan's Land Use Element Land Use Map specifically states that "This map is for informational purposes depicting unincorporated areas within city spheres of influence for which these cities have adopted General Plans. Please refer to city plans for long-term land uses". Because the Project site is within the City of Newport Beach's Sphere of Influence, the "long-term land uses" referenced in the County General Plan would refer to the land uses designated in the City of Newport Beach's General Plan.

The appropriateness of the development levels allowed by the County of Orange was considered when the City of Newport Beach updated its General Plan in 2006. The City determined that the mix of uses and densities were not consistent with their long-range plan for the Project site. Because the Newport Banning Ranch EIR and development application are being processed through the City of Newport Beach, with the City as lead agency, the County's General Plan and zoning designations on the Project site are not the guiding land use designations for the property.

7.4.2 ALTERNATIVE SITE

Section 15126.6(f)(2) of the State CEQA Guidelines sets forth the following criteria for determining whether to identify an alternative site because "An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative" (14 CCR §15126.6[f][3]). Section 15126.6(f)(2) of the State CEQA Guidelines (14 CCR) states:

- (A) Key question. 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.
- (B) None feasible. If the lead agency concludes that no feasible alternative locations exist, it must disclose the reasons for this conclusion, and should include the reasons in the EIR. For example, in some cases there may be no feasible alternative locations for a geothermal plant or mining project which must be in close proximity to natural resources at a given location.
- (C) Limited new analysis required. Where a previous document has sufficiently analyzed a range of reasonable alternative locations and environmental

impacts for projects with the same basic purpose, the lead agency should review the previous document. The EIR may rely on the previous document to help it assess the feasibility of potential project alternatives to the extent the circumstances remain substantially the same as they relate to the alternative (*Citizens of Goleta Valley v. Board of Supervisors* [1990] 52 Cal.3d 553, 573).

Development of the Project on an alternative site has been considered and eliminated from detailed consideration due to the lack of available alternate sites and inability to meet any of the objectives established for the proposed Project.

As described throughout previous sections of this EIR, Newport Beach is almost fully developed, with no other unentitled property suitable for supporting a mixed-use project such as Newport Banning Ranch.

The City underwent a process of evaluating existing and potential future land uses within the City during the 2006 General Plan Update process. This evaluation process took into account overall City goals; focused on conserving the existing pattern of land uses; and established policies for the protection and long-term maintenance of future land uses. The General Plan notes that there are a number of areas of the City that are not achieving their full potential, and the General Plan establishes strategies for their enhancement and revitalization.

The General Plan Land Use Element identifies the following areas of the City for additional/new development and enhanced environments for residents:

- **West Newport Corridor:** consolidate retail and visitor-serving commercial uses, with remaining areas developed for residential units.
- **West Newport Mesa:** re-use underperforming commercial and industrial properties for offices and other uses that support Hoag Hospital's medical activities; improvement of remaining industrial properties that adjoin the City of Costa Mesa; accommodation of non-water marine-related industries; and development of residential areas near jobs and services.
- **Santa Ana Heights:** use properties consistent with the adopted Santa Ana Heights Specific Plan and Redevelopment Plan.
- **John Wayne Airport Area:** re-use underperforming industrial and office properties and development of cohesive residential neighborhoods near jobs and services.
- **Fashion Island/Newport Center:** expand retail uses, hotel rooms, and residential development near jobs and services, while limiting increases in office development.
- **Balboa Peninsula:** incorporate more efficient patterns of use that consolidate the Peninsula's visitor-serving and mixed uses within core commercial districts; encourage marine-related uses, especially along the bay front; integrate residential with retail and visitor-serving uses in Lido Village, McFadden Square, Balboa Village, and along portions of the Harbor frontage; re-use interior parcels in Cannery Village for residential and limited mixed-use and live/work buildings; and redevelop underperforming properties outside the core commercial districts along the Balboa Boulevard corridor for residential.
- **Mariners' Mile:** re-use of underperforming properties for retail, visitor-serving, and marine-related uses, which are integrated with residential uses.

- **Corona del Mar:** enhance public improvements and parking.

Although there are no comparably sized parcels (401 acres) of land located within the City or its Sphere of Influence that have not already been entitled for development. The General Plan does identify opportunity sites for residential development within the airport area, and this area could accommodate the additional housing units by intensifying the planned density for the area. However, for the airport area to absorb the 1,375 housing units identified in the General Plan (including the Housing Element) for the Newport Banning Ranch site, a General Plan amendment for the airport area would be required. The City Charter, Section 423 requires a vote for any General Plan amendment that increases the number of dwelling units in any statistical area by more than 100, and the airport area is in a different statistical area than Banning Ranch. Though the residential units may be able to be approved for the airport area, the airport area would not support the General Plan or Project objectives identified, including increased public access in the Coastal Zone and restoration of habitat. None of the other potential development areas within the City are large enough to support a viable mixed-use development or are located in areas that would allow for the fulfillment of project objectives.

Within the remainder of Orange County, it was determined that no other location exhibited the basic site characteristics (e.g., size, coastal access, consistency with the applicable jurisdiction's General Plan land use designation) on which the proposed Project could be constructed. There are four comparably sized properties within the Coastal Zone of Orange County that provide a mix of land available for development and habitat protection/restoration: Hellman Ranch in the City of Seal Beach, Bolsa Chica in the City of Huntington Beach, Marblehead Coastal in the City of San Clemente, and Dana Point Headlands in the City of Dana Point. Development has been previously approved on all four properties and all local jurisdiction and California Coastal Commission (Coastal Commission) approvals have been obtained, thereby eliminating these properties from further consideration. All four are either completed or currently under development.

Although there may be sites within the inland areas of Orange County, one of the objectives of the proposed Project is to facilitate coastal access through the provision of visitor-serving coastal land uses including but not limited to trails and bikeways, overnight accommodations, and a pedestrian and bicycle bridge over West Coast Highway. A non-coastal site would not be able to achieve this objective and would not be able to provide visitor-serving coastal land uses, which the City established as a goal for buildout of its coastal area. Further, the proposed Project would allow for the restoration and enhancement of sensitive biological resources, including wetlands, within the Coastal Zone.

7.4.3 CONSTRUCTION OF GENERAL PLAN ROADS

Both the City of Newport Beach General Plan Master Plan of Streets and Highways and the Orange County MPAH depict two connections to West Coast Highway through the Project site. One connection would extend south from 19th Street to West Coast Highway, and is proposed as a part of the Project. The second roadway would extend from 15th Street beyond Bluff Road, and would connect with West Coast Highway on the western edge of the Project site. These connections are shown on Exhibit 3-19, Circulation Element Roadways, in Section 3.0, Project Description. The need for these two primary roads was based on the environmental baseline that the 2006 General Plan Update used, which assumes a maximum of 2,735 residential units, 235,600 sf of office, 50,000 sf of commercial, and 164,400 sf of industrial uses on the project site. However, development on the project site was reduced in intensity as part of the 2006 General Plan Update and currently assumes a maximum of 1,375 residential units, 75,000 sf of retail commercial, and 75 hotel rooms. Based on this reduced development intensity, the traffic

analysis for the proposed Project determines that two roads through the project site are not warranted. The alignment selected for the proposed Project would facilitate connection to West Coast Highway from both 19th Street and 15th Street. Refer to Section 4.9, Transportation and Circulation, for further discussion. Elimination of the second connection to West Coast Highway reduces impacts because construction of both roadways would require more extensive development in open space areas.

7.5 ALTERNATIVES FOR ANALYSIS

In accordance with Section 15126.6(a) of the State CEQA Guidelines, the discussion in this section of the EIR focuses on a reasonable range of alternatives. The analysis provides a comparison of the alternatives' varying environmental effects and their merits and/or disadvantages in relation to the proposed Project and to each other; their feasibility and ability to achieve project objectives are also discussed. The environmentally superior alternative is identified as required by CEQA.

The following alternatives are analyzed in this EIR:

- Alternative A: No Project
- Alternative B: General Plan Open Space Designation
- Alternative C: Proposed Project without North Bluff Road Extension to 19th Street
- Alternative D: Reduced Development and Reduced Development Area (No Resort Inn and 1,200 units)
- Alternative E: Reduced Development Area (No Resort Inn)
- Alternative F: Increased Open Space/Reduced Development Area

The evaluation of each alternative uses the same thresholds of significance identified in Sections 4.1 through 4.15. To facilitate the readers' understanding, three tables have been developed that provide an overview and summary comparison of the alternatives. Table 7-1 provides a comparison of the acres of development, acres of open space, and the level of development. Table 7-2 provides a summary comparison of each of the alternatives to the proposed Project. The level of comparison in the table is whether an alternative's level of impact is "less than", the "same", or "greater than" the proposed Project. The analysis is based on the level of impact after mitigation. Table 7-3 is a matrix that provides a comparison of each alternative's ability to meet the project objectives.

**TABLE 7-1
 CHARACTERISTIC COMPARISON OF THE ALTERNATIVES**

	Proposed Project	Alternative A: No Project	Alternative B: General Plan Open Space Designation	Alternative C: Proposed Project without North Bluff Road Extension to 19th Street	Alternative D: Reduced Development and Reduced Development Area	Alternative E: Reduced Development Area (No Resort Inn)	Alternative F: Increased Open Space/Reduced Development Area
Acres of Development ^a	97.4	Oil extraction only	0 ^b	97.2	92.9	92.9	84.0
Acres of Open Space/Resource Protection ^c	252.3	0	369.8	252.0	269.1	269.1	282.4
Acres of Parkland	51.4	0	31.3	51.9 ^d	39.1	39.1	34.7
Number of Residential Units	1,375	0	0	1,375	1,200	1,375	1,375
Square Footage of Commercial Use	75,000	0	0	75,000	75,000	75,000	60,000
Number of Overnight Accommodations	75 rooms	0	0	75 rooms	0	0	0
^a In this context, the development area includes urban development (residential, visitor-serving uses, and mixed use) areas. For those alternatives proposing urban uses, roads are included in the development footprint. The development area does not include parks, oil consolidation areas, or the right-of-way reserve for 19 th Street. This is not intended to represent the disturbed area, which would include trails and remediation area. ^b No development is proposed, but there would be public roads within the Open Space/Resource Protection Category. ^c For all the alternatives, except Alternative A, the interim oil facilities are included in the Open Space/Resource Protection classification because when oil extraction is complete the ultimate use is to restore the area as open space. ^d Without the extension of North Bluff Road, the Bluff Park is extended, increasing the acreage in the Bluff Park by 0.5 acre when compared to the proposed Project.							

**TABLE 7-2
 SUMMARY OF ALTERNATIVE IMPACTS COMPARED TO THE PROPOSED PROJECT**

Topic	Proposed Project	Alternative A: No Project	Alternative B: General Plan Open Space Designation	Alternative C: Proposed Project without North Bluff Road Extension to 19 th Street	Alternative D: Reduced Development and Reduced Development Area	Alternative E: Reduced Development Area (No Resort Inn)	Alternative F: Increased Open Space/Reduced Development Area
SECTION 4.1 – LAND USE AND RELATED PLANNING PROGRAMS							
Threshold 4.1-1: Would the project physically divide an established community?	No Impact – No established communities are on site. The Project would not divide an established community. Significant and Unavoidable – Noise and lighting would potentially result in an incompatibility with adjacent land uses.	Same as proposed Project – No development proposed under this Alternative. Less than proposed Project– Oilfield operations may result in some incompatibility with surrounding land uses; however, there would be no change from existing conditions.	Same as proposed Project – Alternative B would not divide an established community. Same as proposed Project– Vehicular noise and park lighting would potentially result in an incompatibility with adjacent land uses; however, the magnitude of the impact would be less because the park would be further from the existing homes and traffic volumes would be less.	Same as proposed Project – Alternative C would not divide an established community. Same as proposed Project– Vehicular noise and park lighting would potentially result in an incompatibility with adjacent land uses.	Same as proposed Project – Alternative D would not divide an established community. Same as proposed Project– Vehicular noise and park lighting would potentially result in an incompatibility with adjacent land uses.	Same as proposed Project – Alternative E would not divide an established community. Same as proposed Project– Vehicular noise and park lighting would potentially result in an incompatibility with adjacent land uses.	Same as proposed Project – Alternative F would not divide an established community. Same as proposed Project– Vehicular noise and park lighting would potentially result in an incompatibility with adjacent land uses.
Threshold 4.1-2: Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.	No Impact – The Project is consistent with applicable land use policies.	Greater than proposed Project – Alternative A would not meet all applicable goals and policies of the Coastal Act and General Plan, which both assume either residential development with visitor-serving use or preservation as open space.	Same as proposed Project – Alternative B is the primary land use identified in the General Plan. This alternative would be considered consistent with the Coastal Act and applicable local land use policies.	Same as proposed Project – This alternative would be consistent with applicable land use policies.	Greater than proposed Project – Alternative D would generally meet all applicable goals and policies. However, without the overnight accommodations component, this alternative would not provide the visitor services or job opportunities to the same extent as the proposed Project.	Greater than proposed Project – Alternative E would generally meet all applicable goals and policies. However, without the overnight accommodations component, this alternative would not provide the visitor services or job opportunities to the same extent as the proposed Project.	Greater than proposed Project – Alternative F would generally meet all applicable goals and policies. However, without the overnight accommodations component, this alternative would not provide the visitor services or job opportunities to the same extent as the proposed Project.
SECTION 4.2 – AESTHETICS AND VISUAL RESOURCES							
Threshold 4.2-1: Would the project have a substantial adverse effect on a scenic vista?	No Impact – The City does not have any designated scenic vistas on the General Plan and West Coast Hwy is not a State- or locally designated scenic highway.	Same as proposed Project – The City does not have any designated scenic vistas on the General Plan and West Coast Hwy is not a State- or locally designated scenic highway.	Same as proposed Project – The City does not have any designated scenic vistas on the General Plan and West Coast Hwy is not a State- or locally designated scenic highway	Same as proposed Project – The City does not have any designated scenic vistas on the General Plan and West Coast Hwy is not a State- or locally designated scenic highway	Same as proposed Project – The City does not have any designated scenic vistas on the General Plan and West Coast Hwy is not a State- or locally designated scenic highway.	Same as proposed Project – The City does not have any designated scenic vistas on the General Plan and West Coast Hwy is not a State- or locally designated scenic highway	Same as proposed Project – The City does not have any designated scenic vistas on the General Plan and West Coast Hwy is not a State- or locally designated scenic highway
Threshold 4.2-2: Would the project substantially degrade the existing visual character or quality of the site and its surroundings?	Less than Significant Impact – Development of the proposed Project would alter existing views of the Project site; however, the proposed project would not substantially degrade aesthetic character.	Less than proposed Project – No changes to visual character would occur. However, no enhancement or restoration would be provided and there would be no public access to the site.	Less than proposed Project – Because development would be limited to a Community Park and roads, fewer structures would be built and the open space character of the site would be retained.	Less than proposed Project – Alternative C includes development of the same land uses. However, there would be an incremental reduction in impacts by not having roadway through the open space area.	Less than proposed Project – Reduction of approximately 11% of development area and an incremental reduction in the amount of development. Grading is expected to be reduced by 8 to 10%. Change in site character would be the same. Eliminates the resort inn and the pedestrian bridge over West Coast Highway, which would reduce the change to the visual character from certain vantage points.	Less than proposed Project – Reduction of approximately 11% of development area and an incremental reduction in the amount of development. Grading is expected to be reduced by 8 to 10%. Change in site character would be the same. Eliminates the resort inn and the pedestrian bridge over West Coast Highway, which would reduce the change to the visual character from certain vantage points.	Less than proposed Project – Reduction of approximately 14% of development area and an incremental reduction in the amount of development. Grading is expected to be reduced by 25 to 35%. Change in site character would be the same. Eliminates the resort inn and the pedestrian bridge over West Coast Highway, which would reduce the change to the visual character from certain vantage points.

TABLE 7-2 (Continued)
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Threshold 4.2-3: Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	Significant and Unavoidable – The proposed Project would introduce new sources of light on the Project site.	Less than proposed Project – No new nighttime lighting would occur.	Less than the proposed Project but still Significant and Unavoidable – less development but the active sports park with night lighting would be further from the existing residential uses, though closer to the open space.	Same as proposed Project – Alternative C would include the same land uses as the proposed Project, including an active sports park with night lighting.	Same as proposed Project – Alternative D would include the same land uses as the proposed Project, including an active sports park with night lighting.	Same as proposed Project – Alternative E would include the same land uses as the proposed Project, including an active sports park with night lighting.	Same as proposed Project – Alternative F would include the same land uses as the proposed Project, including an active sports park with night lighting.
Threshold 4.2-4: Would the project conflict with any applicable plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	No Impact – The proposed Project is considered consistent with policies of the Newport Beach General Plan and the California Coastal Act with respect to aesthetic resources.	Greater than proposed Project – Alternative A would not meet the long-term goals of oilfield consolidation or enhancement the public viewsheds. Additionally, this alternative would not provide any coastal public access.	Same as proposed Project – Alternative B provides open space and minimizes structures. Consistent with goals and policies of the City's General Plan and the California Coastal Act.	Same as proposed Project – Alternative C would be consistent with the intent of the aesthetic resources goals and policies of the City's General Plan and the California Coastal Act.	Same as proposed Project – Alternative D would be consistent with the intent of the aesthetic resources goals and policies of the City's General Plan and the California Coastal Act.	Same as proposed Project – Alternative E would be consistent with the intent of the aesthetic resources goals and policies of the City's General Plan and the California Coastal Act.	Same as proposed Project – Alternative F would be consistent with the intent of the aesthetic resources goals and policies of the City's General Plan and the California Coastal Act.
SECTION 4.3 – GEOLOGY AND SOILS							
Threshold 4.3-1: Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death from rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Threshold 4.3-2: Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?	Less than significant with mitigation – Although the Project site is not located within an Alquist-Priolo Earthquake Fault Zone, faults within the proposed development site could not be proven to be inactive.	Less than proposed Project – No new structures are proposed under this Alternative.	Less than proposed Project – limited structures are proposed under this Alternative and fewer people would be exposed to impacts associated with these thresholds.	Same as proposed Project – Although the Project site is not located within an Alquist-Priolo Earthquake Fault Zone, faults within the proposed development site could not be proven to be inactive.	Less than proposed Project – Although the Project site is not located within an Alquist-Priolo Earthquake Fault Zone, faults within the proposed development site could not be proven to be inactive. Though the nature of the impacts would be the same, a reduced footprint, elimination of resort inn, and reduction in dwelling units would expose fewer people and structures to impacts associated with these thresholds.	Less than proposed Project – Although the Project site is not located within an Alquist-Priolo Earthquake Fault Zone, faults within the proposed development site could not be proven to be inactive. Though the nature of the impacts would be the same, a reduced footprint and elimination of resort inn would expose fewer people and structures to impacts associated with these thresholds.	Less than proposed Project – Although the Project site is not located within an Alquist-Priolo Earthquake Fault Zone, faults within the proposed development site could not be proven to be inactive. Though the nature of the impacts would be the same, a reduced footprint and elimination of resort inn and visitor-serving commercial would expose fewer people and structures to impacts associated with these thresholds.
Threshold 4.3-3: Would the project expose people or structures to potential substantial adverse effects including the risk of loss, injury, or death from seismic-related ground failure, including liquefaction? Threshold 4.3-4: Would the project expose people or structures to potential substantial adverse effects including the risk of loss, injury, or	Less than significant with mitigation – The Project is required to be consistent with the applicable codes to protect against potential seismic-related ground failure, liquefaction, lateral spreading, soil collapse, and landslide impacts.	Less than proposed Project – No structures are proposed under this Alternative.	Less than proposed Project – Limited facilities are proposed under this Alternative.	Same as proposed Project – Development would be required to be consistent with the applicable codes to protect against potential seismic-related ground failure, liquefaction, lateral spreading, soil collapse, and landslide impacts.	Less than proposed Project – Development would be required to be consistent with the applicable codes to protect against potential seismic-related ground failure, liquefaction, lateral spreading, soil collapse, and landslide impacts. Reduced development would expose fewer people and structures to impacts associated with these thresholds.	Less than proposed Project – Development would be required to be consistent with the applicable codes to protect against potential seismic-related ground failure, liquefaction, lateral spreading, soil collapse, and landslide impacts. Reduced development would expose fewer people and structures to impacts associated with these thresholds.	Less than proposed Project – Development would be required to be consistent with the applicable codes to protect against potential seismic-related ground failure, liquefaction, lateral spreading, soil collapse, and landslide impacts. Reduced development would expose fewer people and structures to impacts associated with these thresholds.

TABLE 7-2 (Continued)
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death from landslides? Threshold 4.3-6: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?							
Threshold 4.3-5: Would the project result in substantial soil erosion or the loss of topsoil?	Less than significant impact – Project incorporates construction BMPs.	Less than proposed Project – This Alternative would not involve any construction and associated potential erosion or loss of topsoil.	Less than proposed Project – Total grading would be reduced. This Alternative would incorporate construction BMPs.	Same as proposed Project – Incremental reduction in grading; but same magnitude of development. This Alternative would incorporate construction BMPs.	Less than proposed Project – Although the nature of the impacts would be the same, there would be an incremental reduction in grading and magnitude of development. This Alternative would incorporate construction BMPs.	Less than proposed Project – Although the nature of the impacts would be the same, there would be an incremental reduction in grading, but the same magnitude of development. This Alternative would incorporate construction BMPs.	Less than proposed Project – Although the nature of the impacts would be the same, there would be an incremental reduction in grading, but the same magnitude of development. This Alternative would incorporate construction BMPs.
Threshold 4.3-7: Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	Less than significant with mitigation – On-site soils have a low to medium expansion potential.	Less than proposed project – No structures are proposed under this Alternative.	Less than proposed Project – Proposes less development.	Same as proposed Project – On-site soils have a low to medium expansion potential. There would be incrementally less grading, but the same magnitude of development under this Alternative.	Less than proposed Project – The nature of the impacts would be the same, but there would be incrementally less grading and magnitude of development under this Alternative.	Less than proposed Project – Although the nature of the impacts would be the same, there would be incrementally less grading, but the same magnitude of development under this Alternative.	Less than proposed Project – Although the nature of the impacts would be the same, there would be incrementally less grading, but the same magnitude of development under this Alternative.
Threshold 4.3-8: Would the project conflict with any applicable plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	No Impact – The Project is consistent with applicable plans and policies.	Same as proposed Project – No development is proposed that would conflict with applicable geotechnical plans and policies.	Same as proposed Project – This Alternative is consistent with applicable geotechnical plans and policies.	Same as proposed Project – This Alternative is consistent with applicable geotechnical plans and policies.	Same as proposed Project – This Alternative is consistent with applicable geotechnical plans and policies.	Same as proposed Project – This Alternative is consistent with applicable geotechnical plans and policies.	Same as proposed Project – This Alternative is consistent with applicable geotechnical plans and policies.
SECTION 4.4 – HYDROLOGY AND WATER QUALITY							
Threshold 4.4-1: Would the project violate any water quality standards or waste discharge requirements? Threshold 4.4-6: Would the project otherwise substantially degrade water quality? Threshold 4.4-11: Would the project result in significant alteration of receiving water quality during or following construction? Threshold 4.4-12: Would the project result in a potential for	Less than significant impact – The Project would comply with the WQMP prepared for the Project and NPDES permit. In addition, the Project would provide for treatment of off-site runoff.	Greater than proposed Project – No development is proposed under this Alternative; however, there would also be no decrease of off-site runoff and no natural treatment of off-site runoff.	Greater than proposed Project – Less grading and less development would minimize the amount of impervious soils and urban pollutants generated by Alternative B; however, there would also be no decrease of off-site runoff and no natural treatment of off-site runoff.	Less than proposed Project – Incrementally less grading would be required and incrementally fewer impervious surfaces would be created. Remediation and construction would be compliant with the WQMP and the NPDES permit. Alternative C would provide for treatment of off-site runoff.	Less than proposed Project – Incrementally less grading would be required and incrementally fewer impervious surfaces would be created. Remediation and construction would be compliant with the WQMP and the NPDES permit. Alternative D would provide for treatment of off-site runoff.	Less than proposed Project – Incrementally less grading would be required and incrementally fewer impervious surfaces would be created. Remediation and construction would be compliant with the WQMP and the NPDES permit. Alternative E would provide for treatment of off-site runoff.	Less than proposed Project – Incrementally less grading would be required and incrementally fewer impervious surfaces would be created. Remediation and construction would be compliant with the WQMP and the NPDES permit. Alternative F would provide for treatment of off-site runoff.

TABLE 7-2 (Continued)
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discharge of storm water pollutants from areas of material storage, vehicle or equipment fueling, vehicle or equipment maintenance (including washing), waste handling, or storage, delivery areas, loading docks or other outdoor work areas? Threshold 4.4-13: Would the project result in the potential for discharge of storm water to affect the beneficial uses of the receiving waters?							
Threshold 4.4-2: Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g. the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	Less than significant impact – The Project incorporates proper design of structural BMPs and LID features.	Less than proposed Project – This Alternative would not change the amount of impervious surface compared to existing conditions.	Less than proposed Project – This Alternative would result in less impervious surface than the proposed Project.	Less than proposed Project – There would be an incremental decrease in the amount of impervious surface; however, overall magnitude is comparable. The Alternative would incorporate proper design of structural BMPs and LID features.	Less than proposed Project – There would be an incremental decrease in the amount of impervious surface. The alternative would incorporate proper design of structural BMPs and LID features.	Less than proposed Project – There would be an incremental decrease in the amount of impervious surface. The alternative would incorporate proper design of structural BMPs and LID features.	Less than proposed Project – There would be an incremental decrease in the amount of impervious surface. The alternative would incorporate proper design of structural BMPs and LID features.
Threshold 4.4-3: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off- site? Threshold 4.4-15: Would the project create significant increases in erosion of the Project site or surrounding areas?	Less than significant impact – The Project would comply with the General Construction Permit and associated NPDES regulations.	Less than proposed Project – No change to existing drainage would occur under Alternative A.	Less than proposed Project – There would be a reduced scale of land development under Alternative B.	Same as proposed Project – This Alternative would comply with the General Construction Permit and associated NPDES regulations.	Less than proposed Project – There would be a reduced scale of land development under Alternative D. This Alternative would comply with the General Construction Permit and associated NPDES regulations.	Less than proposed Project – There would be a reduced scale of land development under Alternative E. This Alternative would comply with the General Construction Permit and associated NPDES regulations.	Less than proposed Project – There would be a reduced scale of land development under Alternative F. This Alternative would comply with the General Construction Permit and associated NPDES regulations.
Threshold 4.4-4: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner in which would result in flooding on- or off-site? Threshold 4.4-14: Would the project create the potential for significant changes in the flow	Less than significant impact – The Project incorporates provisions of the Runoff Management Plan.	Less than proposed Project – No change to existing drainage would occur under this Alternative.	Less than proposed Project – This Alternative would reduce the magnitude of site alteration compared to the proposed Project.	Less than proposed Project – This Alternative would incorporate a Runoff Management Plan and would result in an incremental reduction in the area disturbed.	Less than proposed Project – Less grading and development would occur under this Alternative. This Alternative would incorporate a Runoff Management Plan.	Less than proposed Project – Less grading and development would occur under this Alternative. This Alternative would incorporate a Runoff Management Plan.	Less than proposed Project – Less grading and development would occur under this Alternative. This Alternative would incorporate a Runoff Management Plan.

TABLE 7-2 (Continued)
SUMMARY OF ALTERNATIVE IMPACTS COMPARED TO THE PROPOSED PROJECT

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velocity or volume of storm water runoff to cause environmental harm?							
Threshold 4.4-5: Would the project create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?	Less than significant impact – The Project design would reduce flow rates exiting the site through sections of the Caltrans RCB.	Greater than proposed Project – This Alternative would not provide improvements that would reduce the peak flood flows.	Less than proposed Project – Less grading and development would occur under this Alternative; this Alternative would not result in substantial water runoff off site.	Less than proposed Project – Less grading and elimination of a segment of roadway would reduce the amount of impervious soil associated with Alternative C.	Less than proposed Project – Less grading and development would occur under this Alternative, which would reduce the amount of impervious soil associated with Alternative D.	Less than proposed Project – Less grading and development would occur under this Alternative; which would reduce the amount of impervious soil associated with Alternative E.	Less than proposed Project – Less grading and development would occur under this Alternative; which would reduce the amount of impervious soil associated with Alternative F.
Threshold 4.4-7: Would the project place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map? Threshold 4.4-8: Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?	No impact – Project development would be located outside the 100-year flood hazard area.	Same as proposed Project – With this Alternative, no new structures are proposed.	Same as proposed Project – With this Alternative, no housing is proposed.	Same as proposed Project – Development would be located outside the 100-year flood hazard area.	Same as proposed Project – Development would be located outside the 100-year flood hazard area.	Same as proposed Project – Development would be located outside the 100-year flood hazard area.	Same as proposed Project – Development would be located outside the 100-year flood hazard area.
Threshold 4.4-9: Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	Less than significant impact – Development would be located above the 100-year flood elevation.	Less than proposed Project – No structures are proposed under this Alternative.	Less than proposed Project – Fewer structures are proposed under this Alternative.	Same as proposed Project – Development would be located above the 100-year flood elevation.	Same as proposed Project – Development would be located above the 100-year flood elevation.	Same as proposed Project – Development would be located above the 100-year flood elevation.	Same as proposed Project – Development would be located above the 100-year flood elevation.
Threshold 4.4-10: Would the project be subject to inundation by seiche, tsunami, or mudflow?	Less than significant impact – No standing water bodies or high slopes exist. The Project site is located at a high elevation, and the Project is consistent with City's Emergency Management Plan.	Less than proposed Project – No standing water bodies or high slopes exist, and no structures are proposed under this Alternative.	Less than proposed Project – No standing water bodies or high slopes exist, and no structures are proposed under this Alternative.	Same as proposed Project – No standing water bodies or high slopes exist. The Project site is located at a high elevation, and this Alternative is consistent with City's Emergency Management Plan.	Same as proposed Project – No standing water bodies or high slopes exist. The Project site is located at a high elevation, and this Alternative is consistent with City's Emergency Management Plan.	Same as proposed Project – No standing water bodies or high slopes exist. The Project site is located at a high elevation, and this Alternative is consistent with City's Emergency Management Plan.	Same as proposed Project – No standing water bodies or high slopes exist. The Project site is located at a high elevation, and this Alternative is consistent with City's Emergency Management Plan.
Threshold 4.4-16: Would the project conflict with any applicable plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	No impact – The Project is consistent with applicable plans and policies.	Greater than proposed Project – This Alternative is inconsistent with the provisions of the General Plan regarding clean up of the oilfield site.	Same as proposed Project – This Alternative is consistent with applicable plans and policies.	Same as proposed Project – This Alternative is consistent with applicable plans and policies.	Same as proposed Project – This Alternative is consistent with applicable plans and policies.	Same as proposed Project – This Alternative is consistent with applicable plans and policies.	Same as proposed Project – This Alternative is consistent with applicable plans and policies.

TABLE 7-2 (Continued)
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SECTION 4.5 – HAZARDS AND HAZARDOUS MATERIALS							
<p>Threshold 4.5-1: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?</p> <p>Threshold 4.5-2: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?</p>	Less than significant with mitigation – The oilfield would be consolidated, a final RAP would be implemented and ACMs and LBP would be managed in accordance with applicable State regulations.	Less than proposed Project – No routine transport, use or disposal of hazardous materials associated with construction. However, this alternative would not involve oilfield consolidation or site remediation.	Less than proposed Project – The oilfield would be consolidated, a final RAP would be implemented, and ACMs and LBP would be managed in accordance with applicable State regulations in order to develop public open space uses. There would be less soil disturbance and potentially less soil that would have to be hauled off site because the site remediation would not have to comply with residential standards.	Same as proposed Project – The oilfield would be consolidated, a final RAP would be implemented, and ACMs and LBP would be managed in accordance with applicable State regulations. The absence of a portion of North Bluff Rd would not affect the need for, or implementation of, the RAP.	Same as proposed Project – The oilfield would be consolidated, a final RAP would be implemented, and ACMs and LBP would be managed in accordance with applicable State regulations. The absence of the resort inn would not affect the need for, or implementation of, the RAP.	Same as proposed Project – The oilfield would be consolidated, a final RAP would be implemented, and ACMs and LBP would be managed in accordance with applicable State regulations. The reduction in site development would not affect the need for, or implementation of, the RAP.	Same as proposed Project – The oilfield would be consolidated, a final RAP would be implemented, and ACMs and LBP would be managed in accordance with applicable State regulations. The reduction in site development would not affect the need for, or implementation of, the RAP.
<p>Threshold 4.5-3: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?</p>	Less than significant impact – The oilfield would be consolidated, a final RAP would be implemented, and ACMs and LBP would be managed in accordance with applicable State regulations. The Project would not result in impacts on adjacent schools.	Less than proposed Project – No change in emissions because of the continuation of oil extraction. However, this alternative would not involve oilfield consolidation and site remediation.	Same as proposed Project – It would involve less disturbance of soils that require remediation. However, there would also be less opportunity to deep bury contaminated soils or mix the soil to uncontaminated soil, thereby reducing the concentration of contaminants. As a result, there is the potential that greater amounts of soil would be hauled off site. Haul routes may pass by schools. Alternative B would not result in impacts on adjacent schools.	Same as proposed Project – The oilfield would be consolidated, a final RAP would be implemented in accordance with applicable State regulations. Alternative C would not result in impacts on adjacent schools.	Less than proposed Project – The oilfield would be consolidated, a final RAP would be implemented, and ACMs and LBP would be managed in accordance with applicable State regulations. The reduction in the amount of grading would potentially reduce the amount of soil that would be hauled off site. Haul routes may pass by schools. Alternative D would not result in impacts on adjacent schools.	Less than proposed Project – The oilfield would be consolidated, a final RAP would be implemented, and ACMs and LBP would be managed in accordance with applicable State regulations. The reduction in the amount of grading would potentially reduce the amount of soil that would be hauled off site. Haul routes may pass by schools. Alternative E would not result in impacts on adjacent schools.	Less than proposed Project – The oilfield would be consolidated, a final RAP would be implemented, and ACMs and LBP would be managed in accordance with applicable State regulations. The reduction in the amount of grading would potentially reduce the amount of soil that would be hauled off site. Haul routes may pass by schools. Alternative F would not result in impacts on adjacent schools.
<p>Threshold 4.5-4: Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?</p>	No Impact – The Project site is not identified on the Cortese List, which is compiled pursuant to <i>California Government Code</i> , Section 65962.5.	Same as proposed Project – The Project site is not identified on the Cortese List, which is compiled pursuant to <i>California Government Code</i> , Section 65962.5.	Same as proposed Project – The Project site is not identified on the Cortese List, which is compiled pursuant to <i>California Government Code</i> , Section 65962.5.	Same as proposed Project – The Project site is not identified on the Cortese List, which is compiled pursuant to <i>California Government Code</i> , Section 65962.5.	Same as proposed Project – The Project site is not identified on the Cortese List, which is compiled pursuant to <i>California Government Code</i> , Section 65962.5.	Same as proposed Project – The Project site is not identified on the Cortese List which is compiled pursuant to <i>California Government Code</i> , Section 65962.5.	Same as proposed Project – The Project site is not identified on the Cortese List which is compiled pursuant to <i>California Government Code</i> , Section 65962.5.
<p>Threshold 4.5-5: Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?</p>	No impact – The Project is consistent with applicable plans and policies.	Greater than proposed Project – This Alternative would not provide for the consolidation of oilfield activities or the remediation of the site; however, the majority of the project site would remain as unincorporated Orange County.	Same as proposed Project – This Alternative would be consistent with applicable plans and policies.	Same as proposed Project – Alternative would be consistent with applicable plans and policies.	Same as proposed Project – Alternative would be consistent with applicable plans and policies.	Same as proposed Project – Alternative would be consistent with applicable plans and policies.	Same as proposed Project – Alternative would be consistent with applicable plans and policies.

TABLE 7-2 (Continued)
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SECTION 4.6 – BIOLOGICAL RESOURCES							
<p>Threshold 4.6-1: Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?</p> <p>Threshold 4.6-2: Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or US Fish and Wildlife Service?</p>	Less than significant with mitigation – The Project would have direct and indirect impacts on habitat that supports special status species. The restoration and Mitigation Program would reduce these impacts to a level considered less than significant.	<p><u>Short-Term Impacts</u> Less than proposed Project – On a short-term basis, there would be fewer impacts because there would be less disturbance of the site.</p> <p><u>Long-Term Impacts</u> Greater than proposed Project— On a long-term basis, there would be greater impacts than proposed Project because of continued degradation of the habitat and because no Mitigation Program would be provided.</p>	Less than proposed Project – Decreased development would result in less area being developed and greater opportunity for habitat restoration.	Less than proposed Project – Elimination of the roadway extension would result in more open space and a greater opportunity for habitat restoration.	Less than proposed Project – Decreased development would result in less area being developed and a greater opportunity for habitat restoration.	Less than proposed Project – Decreased development would result in less area being developed and a greater opportunity for habitat restoration.	Less than proposed Project – Decreased development would result in less area being developed and a greater opportunity for habitat restoration.
<p>Threshold 4.6-3: Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?</p>	Less than significant with mitigation – The Project would have direct and indirect impacts on protected wetlands. The Mitigation Program and permit requirements would reduce these impacts.	Less than proposed Project – No impact due to lack of development proposed with this Alternative.	Less than proposed Project – Decreased development would reduce impacts.	Less than proposed Project – Decreased development area would incrementally reduce impacts.	Less than proposed Project – Decreased development area would incrementally reduce impacts.	Less than proposed Project – Decreased development area would incrementally reduce impacts.	Less than proposed Project – Decreased development area would incrementally reduce impacts.
<p>Threshold 4.6-4: Would the project interfere substantially with the movement of any native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?</p>	Less than significant with mitigation – New development would reduce the habitat available in the wildlife movement corridor. The restoration and Mitigation Program would reduce this impact.	Less than proposed Project – No impacts.	Less than proposed Project – The limited development area under this Alternative would result in a reduction of impacts.	Less than proposed Project – The decreased development area would reduce the amount of lost open space due to development.	Less than proposed Project – The decreased development area would reduce the amount of lost open space due to development.	Less than proposed Project – The decreased development area would reduce the amount of lost open space due to development.	Less than proposed Project – The decreased development area would reduce the amount of lost open space due to development.
<p>Threshold 4.6-5: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?</p> <p>Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?</p>	No impact – The Proposed Project is consistent with the provisions of the applicable conservation plan and would not conflict with applicable goals or policies.	Same as proposed Project – Alternative A would be consistent with policies. No habitat disturbance.	Same as proposed Project – Alternative B would be consistent with policies and would have incrementally less habitat disturbance.	Same as proposed Project – Alternative C would be consistent with policies and would have incrementally less habitat disturbance.	Same as proposed Project – Alternative D would be consistent with policies and would have incrementally less habitat disturbance.	Same as proposed Project – Alternative E would be consistent with policies and would have incrementally less habitat disturbance.	Same as proposed Project – Alternative F would be consistent with policies and would have incrementally less habitat disturbance.

TABLE 7-2 (Continued)
SUMMARY OF ALTERNATIVE IMPACTS COMPARED TO THE PROPOSED PROJECT

Topic	Proposed Project	Alternative A: No Project	Alternative B: General Plan Open Space Designation	Alternative C: Proposed Project without North Bluff Road Extension to 19 th Street	Alternative D: Reduced Development and Reduced Development Area	Alternative E: Reduced Development Area (No Resort Inn)	Alternative F: Increased Open Space/Reduced Development Area
SECTION 4.7 – POPULATION, HOUSING, AND EMPLOYMENT							
Threshold 4.7-1: Would the project induce substantial population growth in an area, either directly (for example, by proposed new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	Less than significant impact – Population and housing growth under the proposed Project is consistent with the General Plan.	Less than proposed Project – No growth.	Less than proposed Project – No growth.	Same as proposed Project – Population and housing growth under Alternative C would be consistent with the General Plan.	Same as proposed Project – Population would not exceed population projections.	Same as proposed Project – Population would not exceed population projections.	Same as proposed Project – Population would not exceed population projections. .
Threshold 4.7-2: Would the project conflict with any applicable plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	No impact – The Project is consistent with applicable plans and policies.	Greater than proposed Project – Alternative A would not satisfy any of the City's RHNA goals and would not provide new visitor accommodations in the Coastal Zone. However, it should be noted that the General Plan does provide an option that assumes no development on the Project site.	Greater than proposed Project – This Alternative is the preferred General Plan option. However, it would not help satisfy any of the City's RHNA requirements and would not provide new visitor accommodations in the Coastal Zone.	Same as proposed Project – Alternative C would be consistent with applicable plans and policies.	Greater impact than proposed Project – Alternative D would be generally consistent with applicable plans and policies; however, since it would provide fewer housing units, it would contribute less to meeting RHNA requirements. It would also not provide new visitor accommodations in the Coastal Zone as called for in the General Plan.	Greater than proposed Project – Alternative E would be generally consistent with applicable plans and policies, but it would not provide new visitor accommodations in the Coastal Zone as called for in the General Plan.	Greater than proposed Project – Alternative F would be generally consistent with applicable plans and policies, but would not provide new visitor accommodations or other visitor commercial uses in the Coastal Zone as called for in the General Plan.
SECTION 4.8 – RECREATION AND TRAILS							
Threshold 4.8-1: Would the project include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment? Threshold 4.8-2: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for parks?	Less than significant impact – Project acreage exceeds local Quimby Act and City's General Plan parkland requirements. Impacts of new park development are addressed as component of Project.	Less than proposed Project – Since there would be no project, there would be no impacts associated with construction. However, no recreational facilities would be provided.	Less than proposed Project – This Alternative would provide needed parkland in the West Newport Beach area. With no housing development, the demand for facilities would not increase.	Same as proposed Project – Alternative C would provide new parkland. The impacts associated with providing the park are addressed as part of the impacts of this Alternative. The parkland acreage exceeds local Quimby Act and City's General Plan parkland requirements.	Same as proposed Project – Alternative D would provide new parkland. The impacts associated with providing the park are addressed as part of the impacts of this Alternative. While this Alternative would meet local Quimby Act and City's General Plan parkland requirements, it would provide less parkland and recreational amenities than the proposed Project.	Same as proposed Project – Alternative E would provide new parkland. The impacts associated with providing the park are addressed as part of the impacts of this Alternative. While this Alternative would meet local Quimby Act and City's General Plan parkland requirements, it would provide less parkland and recreational amenities than the proposed Project.	Same as proposed Project – Alternative F would provide new parkland. The impacts associated with providing the park are addressed as part of the impacts of this alternative. While this alternative would meet local Quimby Act and City's General Plan parkland requirements, it would provide less parkland and recreational amenities than the proposed Project.
Threshold 4.8-3: Would the project increase the use of the existing neighborhood and regional parks or other recreational facilities such that a substantial physical deterioration of the facilities would occur or be accelerated?	Less than significant impact – The proposed Project provides parkland in excess of the City's requirements. The proposed Project site would provide parkland that would serve a broader community than just the Project residents.	Less than proposed Project – No development would occur and no increase to existing parks and recreational facilities would occur.	Less than proposed Project – This Alternative would result in a decrease in use of existing parks through provision of a new Community Park and no increase in population.	Same as proposed Project – Alternative C's parkland acreage would exceed local Quimby Act and City's General Plan parkland requirements.	Same as proposed Project – Dedicated parkland acreage under Alternative D would exceed local Quimby Act requirements and City's General Plan parkland requirements.	Same as proposed Project – Dedicated parkland acreage under Alternative E would exceed local Quimby Act requirements and City's General Plan parkland requirements.	Same as proposed Project – Dedicated parkland acreage under Alternative F would exceed local Quimby Act requirements and City's General Plan parkland requirements.

TABLE 7-2 (Continued)
SUMMARY OF ALTERNATIVE IMPACTS COMPARED TO THE PROPOSED PROJECT

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<p>Threshold 4.8-4: Would the project conflict with any applicable plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?</p>	<p>No impact – The Project is consistent with applicable plans and policies.</p>	<p>Greater than proposed Project – Alternative A would not meet City’s General Plan requirement for a Community Park.</p>	<p>Same as proposed Project – Alternative B would be consistent with applicable plans and policies.</p>	<p>Same as proposed Project – Alternative C would be consistent with applicable plans and policies.</p>	<p>Same as proposed Project – Alternative D would be consistent with applicable plans and policies.</p>	<p>Same as proposed Project – Alternative E would be consistent with applicable plans and policies.</p>	<p>Same as proposed Project – Alternative F would be consistent with applicable plans and policies.</p>
<p>SECTION 4.9 – TRANSPORTATION AND CIRCULATION</p>							
<p>Threshold 4.9-1: Would the project cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume-to-capacity ratio on roads, or congestion at intersections)?</p>	<p>Significant and unavoidable impact – The Project would significantly impact intersections in the Cities of Newport Beach and Costa Mesa. The intersection in Newport Beach can be mitigated to a less than significant level. However, the City of Newport Beach cannot impose mitigation on another jurisdiction. Although mitigation is proposed for the impacted intersections in Costa Mesa, it is unknown as to whether these measures would be imposed by the City of Costa Mesa. Therefore, for purposes of CEQA, these impacts are considered significant and unavoidable.</p>	<p>Less than proposed Project – No new traffic would be generated by this Alternative.</p>	<p>Less than proposed Project – Alternative B would not result in significant levels of traffic associated with a Community Park. The construction of roads through the Project site would allow for the redistribution of traffic in the area.</p>	<p>Greater than proposed Project (Existing Plus Alternative C and General Plan Buildout with Alternative C) – Alternative C would significantly impact one more intersection in Costa Mesa in the Existing Plus Alternative C scenario and two more intersections in the General Plan Buildout with Alternative C scenario than the proposed Project in these time frames.</p> <p>Less than proposed Project (Year 2016 With Alternative C Transportation Phasing Ordinance and Year 2016 Cumulative With Alternative C) – Alternative C would significantly impact two fewer intersections in Costa Mesa in the Year 2016 With Alternative C Transportation Phasing Ordinance (TPO) scenario and one fewer intersection with the Year 2016 Cumulative With Alternative C scenario than the proposed Project in these time frames.</p>	<p>Greater than proposed Project – Although this Alternative would generate slightly less average daily traffic and peak hour traffic, the same intersections as the proposed Project would be significantly impacted. The intersection in Newport Beach can be mitigated to a less than significant level. As with the proposed Project, mitigation for intersections in Costa Mesa is proposed but the City cannot impose mitigation on another jurisdiction.</p>	<p>Greater than proposed Project – Although this Alternative would generate slightly greater average daily traffic and peak hour traffic due to the visitor commercial uses, the same intersections as the proposed Project would be significantly impacted. The intersection in Newport Beach can be mitigated to a less than significant level. As with the proposed Project, mitigation for intersections in Costa Mesa is proposed but the City cannot impose mitigation on another jurisdiction.</p>	<p>Less than proposed Project – This Alternative would have incrementally less development (no resort inn) and would not propose the visitor commercial uses, which have a higher traffic generation rate. Although there would be fewer trips, the reduction is not expected to be sufficient to eliminate the significant impacts on local intersections.</p>
<p>Threshold 4.9-2: Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the County congestion management agency for designated roads or highways?</p>	<p>Less than significant impact – Project would not significantly impact any CMP intersections in the traffic study area.</p>	<p>Less than proposed Project – Alternative A would not generate any new traffic. Therefore, no CMP intersections in the traffic study area would be impacted.</p>	<p>Same as proposed Project – Alternative B would not significantly impact any CMP intersections in the traffic study area.</p>	<p>Same as proposed Project – Alternative C would not significantly impact any CMP intersections in the traffic study area.</p>	<p>Same as proposed Project – Alternative D would not significantly impact any CMP intersections in the traffic study area.</p>	<p>Same as proposed Project – Alternative E would not significantly impact any CMP intersections in the traffic study area.</p>	<p>Same as proposed Project – Alternative F would not significantly impact any CMP intersections in the traffic study area.</p>

TABLE 7-2 (Continued)
SUMMARY OF ALTERNATIVE IMPACTS COMPARED TO THE PROPOSED PROJECT

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Threshold 4.9-3: Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment), or result in inadequate emergency access?	Less than significant impact – The proposed roadway system would not create any significant safety hazards.	Less than proposed Project – No roads would be constructed as a part of Alternative A.	Same as proposed Project – The proposed roadway system would not create any significant safety hazards.	Same as proposed Project – The Alternative C roadway system would not create any significant safety hazards.	Same as proposed Project – The Alternative D roadway system would not create any significant safety hazards.	Same as proposed Project – The Alternative E roadway system would not create any significant safety hazards.	Same as proposed Project – The Alternative F roadway system would not create any significant safety hazards.
Threshold 4.9-4: Result in inadequate parking capacity?	Less than significant impact with mitigation – The extension of 15 th St consistent with the General Plan would displace parking at an existing office building. Replacement parking would be provided. The proposed land uses would be required to provide adequate on-site parking in compliance with City requirements and the NBR-PC.	Less than proposed Project – No development would occur as a part of this Alternative. No parking would be required.	Same as proposed Project – Replacement parking would be provided with the extension of 15 th St. The proposed Community Park would be required to provide adequate on-site parking in compliance with City requirements.	Same as proposed Project – As with the proposed Project, Alternative C would be required to provide adequate on-site parking in compliance with City requirements and the NBR-PC; replacement parking would be provided with the extension of 15 th St.	Same as proposed Project – As with the proposed Project, Alternative D would be required to provide adequate on-site parking in compliance with City requirements and the NBR-PC; replacement parking would be provided with the extension of 15 th St.	Same as proposed Project – As with the proposed Project, Alternative E would be required to provide adequate on-site parking in compliance with City requirements and the NBR-PC; replacement parking would be provided with the extension of 15 th St.	Same as proposed Project – As with the proposed Project, Alternative F would be required to provide adequate on-site parking in compliance with City requirements and the NBR-PC; replacement parking would be provided with the extension of 15 th St.
Threshold 4.9-5: Conflict with any applicable plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities or otherwise decrease the performance or safety of such facilities (e.g., bus turnouts, bicycle racks)? Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	No impact – The proposed Project would be consistent with the intent of the transportation-related goals and policies of SCAG, the City of Newport Beach General Plan, and the California Coastal Act. The Project is requesting modifications to the General Plan Circulation Element Master Plan of Streets and Highways and the Orange County MPAH. As amended, the Project would still provide a north-south road connection through the Project site, but would delete a second connection to West Coast Hwy. The Traffic Study demonstrates that the second connection is not needed for the Project or regional forecasted traffic.	Greater than proposed Project – This Alternative would not preclude the future implementation of the roadway system through the Project site; however, it would have greater impacts with policy consistency than the Project, because it would result in substantial delays in the implementation of the improvements proposed in circulation planning documents.	Same as proposed Project – Alternative B assumes the same road system as proposed for the Project. This Alternative would be consistent with the intent of the transportation-related goals and policies of SCAG, the City of Newport Beach General Plan, and the California Coastal Act.	Same as proposed Project – Alternative C would be consistent with the intent of the transportation-related goals and policies of SCAG, the City of Newport Beach General Plan, and the California Coastal Act. This Alternative would construct North Bluff Rd only to just north of 17 th St. The Traffic Study demonstrates that the extension of Bluff Rd is not needed for Project traffic. This Alternative does not propose to delete the segment between 17 th St and 19 th St from either the Newport Beach General Plan Circulation Element or the Orange County MPAH. As with the proposed Project, Alternative C would require amendments to the General Plan Circulation Element Master Plan of Streets and Highways and the Orange County MPAH to delete a second connection to West Coast Hwy. The Traffic Study demonstrates that the second connection is not needed for Alternative C or regional forecasted traffic.	Same as proposed Project – Alternative D would be consistent with the intent of the transportation-related goals and policies of SCAG, the City of Newport Beach General Plan, and the California Coastal Act. As with the proposed Project, Alternative D would modify roads as set forth in the General Plan Circulation Element Master Plan of Streets and Highways and the Orange County MPAH. Alternative D and the proposed Project would still provide a north-south road connection through the Project site but would delete a second connection to West Coast Hwy. The Traffic Study demonstrates that the second connection is not needed for Alternative D or regional forecasted traffic.	Same as proposed Project – Alternative E would be consistent with the intent of the transportation-related goals and policies of SCAG, the City of Newport Beach General Plan, and the California Coastal Act. As with the proposed Project, Alternative E would modify roads as set forth in the General Plan Circulation Element Master Plan of Streets and Highways and the Orange County MPAH. Alternative E and the proposed Project would still provide a north-south road connection through the Project site but would delete a second connection to West Coast Hwy. The traffic study demonstrates that the second connection is not needed for Alternative E or regional forecasted traffic.	Same as proposed Project – Alternative F would be consistent with the intent of the transportation-related goals and policies of SCAG, the City of Newport Beach General Plan, and the California Coastal Act. As with the proposed Project, Alternative F would modify roads as set forth in the General Plan Circulation Element Master Plan of Streets and Highways and the Orange County MPAH. Alternative F and the proposed Project would still provide a north-south road connection through the Project site but would delete a second connection to West Coast Hwy. The Traffic Study demonstrates that the second connection is not needed for Alternative F or regional forecasted traffic.

**TABLE 7-2 (Continued)
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SECTION 4.10 – AIR QUALITY							
Threshold 4.10-1: Conflict with or obstruct implementation of the applicable air quality plan?	No impact – The Project does not exceed the assumptions in the SCAQMD AQMP.	Same as proposed Project – This alternative would not exceed the assumptions in the SCAQMD AQMP.	Same as proposed Project – This alternative would not exceed the assumptions in the SCAQMD AQMP.	Same as proposed Project – This alternative would not exceed the assumptions in the SCAQMD AQMP.	Same as proposed Project – This alternative would not exceed the assumptions in the SCAQMD AQMP.	Same as proposed Project – This alternative would not exceed the assumptions in the SCAQMD AQMP.	Same as proposed Project – This alternative would not exceed the assumptions in the SCAQMD AQMP.
Threshold 4.10-2: Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<u>Construction</u> Significant and unavoidable impact –Without mitigation, regional (mass) emissions of NOx are forecasted to exceed applicable thresholds in some construction years. Though MM 4.10-1 would reduce the emissions to less than significant, the availability of sufficient Tier 4 diesel engine construction equipment cannot be assured. Therefore, for purposes of this EIR, the impacts are found to be a significant and unavoidable impact. <u>Operations</u> Long-term operational emissions of criteria pollutants would not exceed the SCAQMD mass emissions thresholds from initial occupancy through 2020. However, as Project development continues beyond 2020, emissions of VOC and CO would exceed the significance thresholds, principally due to vehicle operations.	Less than proposed Project – Emissions from any possible expansion of oilfield activities would be less than significant.	<u>Construction</u> Less than proposed Project – Short-term air quality emissions associated with this alternative would be less than with the proposed Project but would be significant prior to mitigation. <u>Operations</u> Less than proposed Project – Long-term emissions from park use would be less than significant.	<u>Construction</u> Same as proposed Project. <u>Operations</u> Greater than proposed Project. An increase in VMT would incrementally increase pollutant emissions.	<u>Construction</u> Less than proposed Project— Construction maximum daily emissions would be essentially the same as for the proposed Project, although the construction duration may be slightly less. <u>Operations</u> Less than proposed Project. Although there would be an approximate 1.6% reduction in VMT, impacts would still be significant and unavoidable.	<u>Construction</u> Less than proposed Project— Construction maximum daily emissions would be essentially the same as for the proposed Project, although the construction duration may be slightly less. <u>Operations</u> Greater than proposed Project. There would be an approximate 5.2% increase in VMT with similar increase in long range vehicle emissions.	<u>Construction</u> Less than proposed Project— Construction maximum daily emissions would be essentially the same as for the proposed Project, although the construction duration may be slightly less. <u>Operations</u> Less than proposed Project. Though still Significant and Unavoidable, Alternative F would have an approximately 9% reduction in VMT.
Threshold 4.10-3: Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable NAAQS or CAAQS (including releasing emissions that exceed quantitative thresholds for ozone precursors)?	Significant and unavoidable impact –The Project would have cumulatively considerable contributions to regional pollutant concentrations of O ₃ .	Less than proposed Project (Less than significant). Emissions from possible expansion of oilfield activities would not be cumulatively considerable.	Less than proposed Project (Less than significant). Long-term emissions from park use would not be cumulatively considerable.	Greater than proposed Project (significant and unavoidable). Impacts would be incrementally greater due to an increase in VMT would increase pollutant emissions.	Same as proposed Project (significant and unavoidable). Impacts would be incrementally less due to a decrease in VMT that would result a negligible decrease pollutant emissions compared to the proposed Project.	Greater than proposed Project (Significant and Unavoidable). Impacts would be incrementally greater due to an increase in VMT that would increase pollutant emissions	Less than proposed Project (significant and unavoidable). Impacts would be incrementally less due to a decrease in VMT that would decrease pollutant emissions.
Threshold 4.10-4: Expose sensitive receptors to substantial pollutant concentrations?	Less than significant impact – TAC emissions would be less than thresholds for both off-site and on-site receptors.	Less than proposed Project – There would be no TAC emissions from on-site residential or commercial uses or exposure of on-site residents to oilfield emissions.	Less than proposed Project – There would be no TAC emissions from on-site residential or commercial uses or from exposure of on-site residents to oilfield emissions.	Same as proposed Project – TAC emissions would be less than thresholds for both off-site and on-site receptors.	Same as proposed Project – TAC emissions would be less than thresholds for both off-site and on-site receptors.	Same as proposed Project – TAC emissions would be less than thresholds for both off-site and on-site receptors.	Same as proposed Project – TAC emissions would be less than thresholds for both off-site and on-site receptors.

TABLE 7-2 (Continued)
SUMMARY OF ALTERNATIVE IMPACTS COMPARED TO THE PROPOSED PROJECT

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Threshold 4.10-5: Create objectionable odors affecting a substantial number of people?	Less than significant impact – The proposed Project would not create odors affecting a substantial number of people.	Same as proposed Project – This Alternative would not create odors affecting a substantial number of people.	Same as proposed Project – This Alternative would not create odors affecting a substantial number of people.	Same as proposed Project – The proposed Project would not create odors affecting a substantial number of people.	Same as proposed Project – The proposed Project would not create odors affecting a substantial number of people.	Same as proposed Project – The proposed Project would not create odors affecting a substantial number of people.	Same as proposed Project – The proposed Project would not create odors affecting a substantial number of people.
Threshold 4.10-6: Conflict with any applicable plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	No Impact –The Proposed Project is consistent with applicable plans and policies.	Same as proposed Project – Alternative A would be consistent with applicable plans and policies.	Same as proposed Project – Alternative B would be consistent with applicable plans and policies.	Same as proposed Project – Alternative C would be consistent with applicable plans and policies.	Same as proposed Project – Alternative D would be consistent with applicable plans and policies.	Same as proposed Project – Alternative E would be consistent with applicable plans and policies.	Same as proposed Project – Alternative F would be consistent with applicable plans and policies.
SECTION 4.11 – GREENHOUSE GAS EMISSIONS							
Threshold 4.11-1: Generate greenhouse gas (GHG) emissions, either directly or indirectly, that may have a significant impact on the environment, i.e. emit more than 6,000 MTCO ₂ e/yr of GHG?	Cumulatively Significant and Unavoidable – Long-term Project GHG emissions are estimated at 19,392 MTCO ₂ e/yr, substantially exceeding the 6,000 MTCO ₂ e/yr significance threshold.	Less than proposed Project – This Alternative would allow for the expansion of oil production facilities, which would result in temporary and long-term GHG emissions. However, emissions would be substantially less than 6,000 MTCO ₂ e/yr.	Less than proposed Project – This Alternative would result in temporary construction GHG emissions and long-term GHG emissions associated with operation and maintenance of the park. However, emissions would be substantially less than 6,000 MTCO ₂ e/yr.	Greater than proposed Project – This impact would be significant and unavoidable and slightly greater than the proposed Project under this Alternative. Long-term Project GHG emissions are estimated to exceed 6,000 MTCO ₂ e/yr.	Less than proposed Project – This impact would be significant and unavoidable, but slightly less than the proposed Project because of the reduced development. GHG emissions would substantially exceed 6,000 MTCO ₂ e/yr.	Greater than proposed Project – This impact would be significant and unavoidable and greater than the proposed Project because of the increased VMT.	Less than proposed Project – This impact would be significant and unavoidable, but less than the proposed Project because of the reduced development and reduced VMT. GHG emissions would substantially exceed 6,000 MTCO ₂ e/yr.
Threshold 4.11-2: Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	No impact – The Project is consistent with applicable plans and policies.	Same as proposed Project – Alternative A would not conflict with applicable plans and policies.	Same as proposed Project. – Alternative B would be consistent with applicable plans and policies.	Same as proposed Project. – Alternative C would be consistent with applicable plans and policies.	Same as proposed Project. – Alternative D would be consistent with applicable plans and policies.	Same as proposed Project. – Alternative E would be consistent with applicable plans and policies.	Same as proposed Project. – Alternative F would be consistent with applicable plans and policies.
SECTION 4.12 – NOISE							
Threshold 4.12-1: Would the project expose persons to or generate noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? Threshold 4.12-4: Would the project result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<u>Significant and Unavoidable Impacts</u> 1. Cumulative increase in traffic noise on 17 th St 2. Cumulative noise increase at Newport Crest. <u>Less than Significant with Mitigation</u> 3. Cumulative increase in traffic noise on 15 th St 4. Internal compatibility of proposed land uses. 5. Noise impacts from stationary sources. <u>Less than Significant</u> 6. Cumulative and Project traffic noise to California Seabreeze/ Parkview Circle and Carden Hall School.	Less than proposed Project – Since there would be no development, there would be no increase in noise levels associated with Alternative A.	Less than proposed Project – <u>Significant and Unavoidable</u> 1. Cumulative traffic noise increase on 17 th St. 2. Cumulative Noise level approx. 1 dBA less than with proposed Project at Newport Crest. <u>Less than Significant with Mitigation</u> 3. Cumulative increase in traffic noise on 15 th St 4. Internal compatibility of proposed land uses. 5. Noise impacts from stationary sources. <u>Less than Significant</u> 6. Cumulative and Project traffic noise to California Seabreeze/ Parkview Circle	Same as proposed Project – <u>Significant and Unavoidable</u> 1. Cumulative traffic noise increase on 17 th St. Greater than proposed Project – <u>Significant and Unavoidable</u> 2. Significant and Unavoidable t at Newport Crest— noise level approx. 0.4 dBA greater. Same as proposed Project – <u>Less than Significant with Mitigation</u> 3. Cumulative increase in traffic noise on 15 th St 4. Internal compatibility of proposed land uses. 5. Noise impacts from stationary sources.	Same as proposed Project – <u>Significant and Unavoidable</u> 1. Cumulative traffic noise increase on 17 th St. Greater than proposed Project – <u>Significant and Unavoidable</u> 2. Significant and Unavoidable at Newport Crest—noise level less than 1 dBA greater. <u>Less than Significant with Mitigation</u> 3. Cumulative increase in traffic noise on 15 th St slightly greater. Same as proposed Project – <u>Less than Significant with Mitigation</u> 4. Internal compatibility of proposed land uses.	Greater than proposed Project – <u>Significant and Unavoidable</u> 1. Slight increase in cumulative traffic noise increase on 17 th St. 2. Significant and Unavoidable at Newport Crest—noise level less than 1 dBA greater. <u>Less than Significant with Mitigation</u> 3. Cumulative increase in traffic noise on 15 th St slightly greater. Same as proposed Project – <u>Less than Significant with Mitigation</u> 4. Internal compatibility of proposed land uses. 5. Noise impacts from	Less than proposed Project – <u>Significant and Unavoidable</u> 1. Slight reduction in cumulative traffic noise increase on 17 th St. 2. Slight reduction in traffic noise at Newport Crest. <u>Less than Significant with Mitigation</u> 3. Slight reduction in cumulative increase in traffic noise on 15 th St 4. Slight reduction in internal noise levels. Same as proposed Project – <u>Less than Significant with Mitigation</u> 5. Noise impacts from stationary sources. <u>Less than Significant</u>

TABLE 7-2 (Continued)
SUMMARY OF ALTERNATIVE IMPACTS COMPARED TO THE PROPOSED PROJECT

Topic	Proposed Project	Alternative A: No Project	Alternative B: General Plan Open Space Designation	Alternative C: Proposed Project without North Bluff Road Extension to 19 th Street	Alternative D: Reduced Development and Reduced Development Area	Alternative E: Reduced Development Area (No Resort Inn)	Alternative F: Increased Open Space/Reduced Development Area
			and Carden Hall School.	<u>Less than Significant</u> 6. Cumulative and Project traffic noise to California Seabreeze/Parkview Circle and Carden Hall School.	5. Noise impacts from stationary sources. <u>Less than Significant</u> 6. Cumulative and Project traffic noise to California Seabreeze/ Parkview Circle and Carden Hall School.	stationary sources. <u>Less than Significant</u> 6. Cumulative and Project traffic noise to California Seabreeze/ Parkview Circle and Carden Hall School.	6. Cumulative and Project traffic noise to California Seabreeze/ Parkview Circle and Carden Hall School.
Threshold 4.12-2: Would the project result in a temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	Significant and Unavoidable Impact – Construction noise would cause substantial temporary noise increases at nearby residential and school receptors.	Less than proposed Project – This alternative would allow for expansion of oil production facilities, which would result in periodic noise from drilling and construction. However, noise levels would be substantially less than the proposed Project.	Less than proposed Project – The impact under this Alternative would be significant and unavoidable, but less than proposed Project because the duration of impacts would be less due to less construction.	Less than proposed Project – The impact under this Alternative would be significant and unavoidable but less than proposed Project. Construction noise would cause substantial temporary noise increases at nearby residential and school receptors, but there would be fewer impacts to receptors near and north of 17 th St.	Same as proposed Project – Construction noise would cause substantial temporary noise increases at nearby residential and school receptors.	Same as proposed Project – Construction noise would cause substantial temporary noise increases in nearby residential and school receptors.	Same as proposed Project – Construction noise would cause substantial temporary noise increases in nearby residential and school receptors.
Threshold 4.12-3: Would the project expose people to or generate excessive groundborne vibration or groundborne noise levels?	Less than significant with mitigation – Vibration may be noticeable for short periods during construction, but it would be temporary and periodic and would not be excessive.	Less than proposed Project – No exposure of persons to or generation of noise vibration levels in excess of standards.	Less than proposed Project – Nature of vibration impacts would be the same as the proposed Project but duration of construction activity would be reduced.	Same as proposed Project – Short-term vibration impacts would occur during construction activities.	Same as proposed Project – Short-term vibration impacts would occur during construction activities.	Same as proposed Project – Short-term vibration impacts would occur during construction activities.	Same as proposed Project – Short-term vibration impacts would occur during construction activities.
Threshold 4.12-5: Would the project be located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, expose people residing or working in the project area to excessive noise levels. Threshold 4.12-6: Would the project be within the vicinity of a private airstrip and expose people residing or working in the project area to excessive noise levels?	No Impact – The Project site is located outside the 60 dBA CNEL from John Wayne Airport and no significant noise impacts from aircraft activities would occur.	Same as proposed Project – The Project site is located outside the 60 dBA CNEL from John Wayne Airport and no significant noise impacts from aircraft activities would occur	Same as proposed Project – The Project site is located outside the 60 dBA CNEL from John Wayne Airport and no significant noise impacts from aircraft activities would occur	Same as proposed Project – The Project site is located outside the 60 dBA CNEL from John Wayne Airport and no significant noise impacts from aircraft activities would occur	Same as proposed Project – The Project site is located outside the 60 dBA CNEL from John Wayne Airport and no significant noise impacts from aircraft activities would occur	Same as proposed Project – The Project site is located outside the 60 dBA CNEL from John Wayne Airport and no significant noise impacts from aircraft activities would occur	Same as proposed Project – The Project site is located outside the 60 dBA CNEL from John Wayne Airport and no significant noise impacts from aircraft activities would occur
Threshold 4.12-7: Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	No impact – The Project is consistent with the applicable plans and policies related to noise.	Same as proposed Project – Alternative A would be consistent with applicable plans and policies.	Same as proposed Project – Alternative B would be consistent with applicable plans and policies.	Same as proposed Project – Alternative C would be consistent with applicable plans and policies.	Same as proposed Project – Alternative D would be consistent with applicable plans and policies.	Same as proposed Project – Alternative E would be consistent with applicable plans and policies.	Same as proposed Project – Alternative F would be consistent with applicable plans and policies.

TABLE 7-2 (Continued)
SUMMARY OF ALTERNATIVE IMPACTS COMPARED TO THE PROPOSED PROJECT

Topic	Proposed Project	Alternative A: No Project	Alternative B: General Plan Open Space Designation	Alternative C: Proposed Project without North Bluff Road Extension to 19 th Street	Alternative D: Reduced Development and Reduced Development Area	Alternative E: Reduced Development Area (No Resort Inn)	Alternative F: Increased Open Space/Reduced Development Area
SECTION 4.13 – CULTURAL AND PALEONTOLOGICAL RESOURCES							
Threshold 4.13-1: Would the project cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	Less than significant with mitigation – The Project would not impact any known historical resources. If any unknown resources are identified, the standard conditions would require compliance with rules and regulations.	Less than proposed Project – Under this Alternative, the Project site would not be disturbed.	Less than proposed Project – The decreased land disturbance under Alternative B would reduce potential for discovery of unknown resources.	Same as proposed Project – The magnitude of development under Alternative C would be similar to the Project with the potential for discovery of unknown resources.	Same as proposed Project – The general magnitude of development under Alternative D would be similar with the potential for discovery of unknown resources.	Same as proposed Project – The general magnitude of development under Alternative E would be similar with the potential for discovery of unknown resources.	Same as proposed Project – The general magnitude of development under Alternative F would be similar with the potential for discovery of unknown resources.
Threshold 4.13-2: Would the project cause a substantial adverse change in the significance of an archaeological resource as defined in §15064.5?	Less than significant with mitigation – The Project would impact known archaeological resources; however, compliance with rules and regulations would reduce impacts.	Less than proposed Project – Under Alternative A, the project site would not be disturbed.	Less than proposed Project – Decreased land use development under Alternative B would help avoid some resources. Impacts to sites CA-ORA-839 and CA-ORA-844B would be reduced.	Less than proposed Project – There would be impacts to known archaeological resources under this Alternative, but CA-ORA-906 would be preserved.	Same as proposed Project – Alternative D would impact known archaeological resources. Compliance with rules and regulations would reduce impacts.	Same as proposed Project – Alternative E would impact known archaeological resources. Compliance with rules and regulations would reduce impacts.	Same as proposed Project – Alternative F would impact known archaeological resources. Compliance with rules and regulations would reduce impacts.
Threshold 4.13-3: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	Less than significant with mitigation – Although there are potential resources on Project site, compliance with rules and regulations would reduce impacts.	Less than proposed Project – Limited site disturbance under Alternative A would reduce the potential for impacts to paleontological resources.	Less than proposed Project – There are potential resources on Project site, but decreased land disturbance would reduce impacts.	Same as proposed Project – There are potential resources on Project site, but compliance with rules and regulations would reduce impacts.	Same as proposed Project – There are potential resources on Project site, but compliance with rules and regulations would reduce impacts.	Same as proposed Project – There are potential resources on Project site, but compliance with rules and regulations would reduce impacts.	Same as proposed Project – There are potential resources on Project site, but compliance with rules and regulations would reduce impacts.
Threshold 4.13-4: Would the project disturb any human remains, including those interred outside of formal cemeteries?	Less than significant with mitigation – No indication of burials on site. If discovered during grading, rules and regulations would be implemented.	Less than proposed Project – Site would not be disturbed.	Less than proposed Project – Decreased land disturbance would minimize likelihood of discovery of interment.	Same as proposed Project – Magnitude of development is similar.	Same as proposed Project – Magnitude of development is similar.	Same as proposed Project – Magnitude of development is similar.	Same as proposed Project – Magnitude of development is similar.
Threshold 4.13-5: Would the project conflict with any applicable plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	No impact – The Project is consistent with applicable plans and policies.	Same as proposed Project – Alternative A would be consistent with applicable plans and policies.	Same as proposed Project – Alternative B would be consistent with applicable plans and policies.	Same as proposed Project – Alternative would be consistent with applicable plans and policies.	Same as proposed Project – Alternative would be consistent with applicable plans and policies.	Same as proposed Project – Alternative would be consistent with applicable plans and policies.	Same as proposed Project – Alternative would be consistent with applicable plans and policies.

TABLE 7-2 (Continued)
SUMMARY OF ALTERNATIVE IMPACTS COMPARED TO THE PROPOSED PROJECT

Topic	Proposed Project	Alternative A: No Project	Alternative B: General Plan Open Space Designation	Alternative C: Proposed Project without North Bluff Road Extension to 19 th Street	Alternative D: Reduced Development and Reduced Development Area	Alternative E: Reduced Development Area (No Resort Inn)	Alternative F: Increased Open Space/Reduced Development Area
SECTION 4.14 – PUBLIC SERVICES AND FACILITIES							
Fire Protection Threshold 4.14-1: Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection.	Less than significant with mitigation – Site Planning Area 12b, the northerly block of Site Planning Area 10a, and the northerly block of Site Planning Area 10b cannot be served by Station Number 2 within the established response time. Implementation of the Mitigation Program would adequately reduce response times.	Less than proposed Project – Since there would be no development on site, the need for fire protection service would remain the same as it is currently.	Less than proposed Project – The less intense uses (park and recreational uses) under Alternative B would require less demand for fire protection services. No physical improvements would be required to maintain an acceptable level of service.	Same as proposed Project – The same land use areas would not be able to be served by Station Number 2 within the established response time. Implementation of the Mitigation Program would adequately reduce response times.	Same as proposed Project – Incrementally less development under Alternative D would reduce the level of demand. However, the same land use areas would not be able to be served by Station Number 2 within the established response time. Implementation of the Mitigation Program would adequately reduce response times.	Same as proposed Project – Incrementally less development under Alternative E would reduce the level of demand. However, the same land use areas would not be able to be served by Station Number 2 within the established response time. Implementation of the Mitigation Program would adequately reduce response times.	Less than proposed Project – Incrementally less development under Alternative F would reduce the level of demand. The development area that could not be served by Station Number 2 within the established response time would be reduced compared to the proposed Project. Implementation of the Mitigation Program would adequately reduce response times.
Police Protection Threshold 4.14-3: Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection.	Less than significant impact – Police protection services can be provided without the need for new or physically altered facilities.	Less than proposed Project – Since there would be no development on site, the need for police protection service would remain the same as it is currently.	Less than proposed Project – The less intense uses (park uses) under Alternative B would require less demand for police protection services. No physical improvements required to maintain an acceptable level of service.	Same as proposed Project – Alternative C proposes the same land uses as proposed Project. No physical improvements would be required to maintain an acceptable level of service.	Less than proposed Project – Alternative D would include fewer dwelling units and no overnight accommodations, which would reduce the level of demand for police protection services. No physical improvements would be required to maintain an acceptable level of service.	Less than proposed Project – The fact that there are no overnight accommodations under Alternative E would reduce the level of demand for police protection services. No physical improvements would be required to maintain an acceptable level of service.	Less than proposed Project – The fact that there are no overnight accommodations or visitor-serving commercial under Alternative F would reduce the level of demand for police protection services. No physical improvements would be required to maintain an acceptable level of service.
Schools Threshold 4.14-5: Result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities, need for new or physically altered school facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable levels of service ratios or other performance objectives for public school facilities.	Less than significant impact – Project-generated students would attend Newport Mesa Unified School District which has capacity for all class levels (K–12).	Less than proposed Project – Since there would be no development on site, the need for schools would remain the same as it is currently.	Less than proposed Project – Park uses would not generate students.	Same as proposed Project – Alternative C would have the same student generation as the proposed Project.	Less than proposed Project – Fewer dwelling units under Alternative D would generate fewer students.	Same as proposed Project – Alternative E would have the same student generation as the proposed Project.	Same or similar to as proposed Project – Alternative F would have the same student generation as the proposed Project. Fewer students could be generated based on the School District’s distinction between single-family attached and single-family detached units.

TABLE 7-2 (Continued)
SUMMARY OF ALTERNATIVE IMPACTS COMPARED TO THE PROPOSED PROJECT

Topic	Proposed Project	Alternative A: No Project	Alternative B: General Plan Open Space Designation	Alternative C: Proposed Project without North Bluff Road Extension to 19 th Street	Alternative D: Reduced Development and Reduced Development Area	Alternative E: Reduced Development Area (No Resort Inn)	Alternative F: Increased Open Space/Reduced Development Area
Library Services Threshold 4.14-7: Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for library services.	No impact – Project would not significantly impact library services or create the need for new or expanded library facilities.	Less than proposed Project – Since there would be no development on site, the need for library services would remain the same as it is currently.	Less than proposed Project – Park uses would not impact library services.	Same as proposed Project – Alternative C would have the same land uses as proposed Project would have same demand for library services.	Less than proposed Project – Fewer dwelling units under Alternative D would reduce the demand on library services.	Same as proposed Project – Alternative E would have the same number of residential units as the proposed Project; therefore, Alternative E would have same demand for library services.	Same as proposed Project – Alternative F would have the same number of residential units as proposed Project; therefore, Alternative F would have same demand for library services.
Solid Waste Threshold 4.14-9: Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for solid waste services.	Less than significant impact – The Project would not significantly impact solid waste services or create the need for new or expanded solid waste facilities.	Less than proposed Project – Since there would be no development on site, the need for solid waste services would remain the same as it is currently.	Less than proposed Project – The less intense uses (park uses) under Alternative B would generate less demand for solid waste services.	Same as proposed Project – Alternative C would have the same land uses as the proposed Project and would generate the same amount of solid waste.	Less than proposed Project – Fewer dwelling units and no overnight accommodations under Alternative D would create less demand for solid waste services.	Less than proposed Project – No overnight accommodations under Alternative E would create less demand for solid waste services.	Less than proposed Project – No overnight accommodations and visitor-serving commercial uses under Alternative F would create less demand for solid waste services.
Thresholds 4.14-2, 4.14-4, 4.14-6, 4.14-8, and 4.14-10: Conflict with any applicable plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	No impact – The Project is consistent with applicable plans and policies.	Same as proposed Project – The City General Plan policies would not be applicable because with this Alternative the site would not be annexed into the City.	Same as proposed Project – Alternative B would be consistent with applicable plans and policies.	Same as proposed Project – Alternative C would be consistent with applicable plans and policies.	Same as proposed Project – Alternative D would be consistent with applicable plans and policies.	Same as proposed Project – Alternative E would be consistent with applicable plans and policies.	Same as proposed Project – Alternative F would be consistent with applicable plans and policies.
SECTION 4.15 – UTILITIES							
Water Supply Threshold 4.15-1: Require or result in the construction of new water treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	Less than significant impact – The Project would provide new water lines and connections, the impacts of which are addressed as part of the development project. No new or expanded water treatment facilities would be required.	Less than proposed Project – Since there would be no development on site, no new infrastructure would be required.	Less than proposed Project – Alternative B would have less intense uses (park and recreational uses) and would require less water-related infrastructure; however, backbone infrastructure would still be required.	Same as proposed Project – Alternative C would have the same land uses as the proposed Project and would require the same infrastructure. Impacts associated with the provision of infrastructure have been included as part of the analysis for the development.	Same as proposed Project – Alternative D would have fewer dwelling units and no overnight accommodations, which would reduce the demand for water; however, impacts related infrastructure to distribute water would be similar to the proposed Project.	Same as proposed Project – Since Alternative E would have no overnight accommodations, the demand for water would be reduced; however, impacts related infrastructure to distribute water would be similar to the proposed Project.	Same as proposed Project – Since Alternative F would have no overnight accommodations or visitor-serving commercial, the demand for water would be reduced; however, impacts related infrastructure to distribute water would be similar to the proposed Project.

TABLE 7-2 (Continued)
SUMMARY OF ALTERNATIVE IMPACTS COMPARED TO THE PROPOSED PROJECT

Topic	Proposed Project	Alternative A: No Project	Alternative B: General Plan Open Space Designation	Alternative C: Proposed Project without North Bluff Road Extension to 19 th Street	Alternative D: Reduced Development and Reduced Development Area	Alternative E: Reduced Development Area (No Resort Inn)	Alternative F: Increased Open Space/Reduced Development Area
Threshold 4.15-2: Have insufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	Less than significant impact – The Project would increase demand for water supply, but the Water Supply Assessment demonstrates that water supplies are sufficient for Project and other projected growth.	Less than proposed Project – Since there would be no development on site, the site's current water needs would remain the same.	Less than proposed Project – The less intense uses (park and recreational uses) under Alternative B would result in less water demand than the proposed Project.	Same as proposed Project – Since Alternative C would have same land uses as proposed Project, the water demand would be the same as for the proposed Project.	Less than proposed Project – Alternative D would have fewer dwelling units and no overnight accommodations, which would reduce the demand for water compared to the proposed Project.	Less than proposed Project – Since Alternative E would have no overnight accommodations, the demand for water would be reduced compared to the proposed Project.	Less than proposed Project – Since Alternative F would have no overnight accommodations or visitor-serving commercial, the demand for water would be reduced compared to the proposed Project.
Wastewater Facilities Threshold 4.15-4: Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board? Threshold 4.15-5: Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	Less than significant impact – The Project would be subject to RWQCB treatment requirements, and Project flows would not exceed the established wastewater treatment capacity.	Less than proposed Project – Since there would be no development on site, the wastewater needs would remain the same as current conditions.	Less than proposed Project – Since there would be less intense uses (park and recreational uses) there would be less wastewater generated for treatment. However, Alternative B would be subject to the same requirements as the proposed Project.	Same as proposed Project – Wastewater generation under Alternative C would be the same as the proposed Project, and Alternative C would be subject to the same requirements as the proposed Project.	Less than proposed Project – Since Alternative D would have fewer dwelling units and no overnight accommodations, the demand for wastewater treatment would be reduced compared to the proposed Project. However, Alternative D would be subject to the same requirements as the proposed Project.	Less than proposed Project – Since Alternative E would have no overnight accommodations, the demand for wastewater treatment would be reduced compared to the proposed Project. However, Alternative E would be subject to the same requirements as the proposed Project.	Less than proposed Project – Since Alternative F would have no overnight accommodations or visitor-serving commercial, the demand for wastewater treatment would be reduced compared to the proposed Project. However, Alternative F would be subject to the same requirements as the proposed Project.
Energy Threshold 4.15-7: Result in substantial adverse physical impacts associated with the provision of new or physically altered energy transmission facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable levels of service?	Less than significant impact – The electrical and natural gas utility providers have indicated their ability to serve the proposed Project without adversely affecting their ability to continue serving the Project area. Physical impacts related to installation and/or relocation of necessary infrastructure includes air quality and noise impacts addressed as part of the Project.	Less than proposed Project – Since there would be no development on site, the utility service needs would remain the same as current conditions.	Less than proposed Project – Less intense uses (park and recreational uses) under Alternative B would generate less demand for electrical and natural gas service compared to the proposed Project.	Same as proposed Project – Since Alternative C would have the same land uses as proposed Project, the same demand would result.	Same as proposed Project – Since Alternative D would have fewer dwelling units and no overnight accommodations, the demand for electrical and natural gas service would be reduced compared to the proposed Project. However, the impacts associated with provision of energy transmission facilities would be the same as the proposed Project.	Same as proposed Project – Since Alternative E would have no resort inn, the demand for electrical and natural gas service would be reduced compared to the proposed Project. However, the impacts associated with provision of energy transmission facilities would be the same as the proposed Project.	Same as proposed Project – Since Alternative F would have no resort inn or visitor-serving commercial, the demand for electrical and natural gas service would be reduced compared to the proposed Project. However, the impacts associated with provision of energy transmission facilities would be the same as the proposed Project.
Thresholds 4.15-3, 4.15-6, and 4.15-8: Conflict with any applicable plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	No impact – The Project is consistent with applicable plans and policies.	Same as proposed Project – Though Alternative A would not implement improvements identified in the General Plan policies associated with utilities, there would be no impact since this alternative would not involve annexation.	Same as proposed Project – Alternative B would implement the Open Space concept in the General Plan and would be consistent with the applicable policies.	Same as Proposed Project – Alternative C would be consistent with applicable plans and policies.	Same as proposed Project – Alternative D would be consistent with applicable plans and policies.	Same as proposed Project – Alternative E would be consistent with applicable plans and policies.	Same as proposed Project – Alternative F would be consistent with applicable plans and policies.

BMP: Best Management Practice; WQMP: Water Quality Management Plan; NPDES: National Pollutant Discharge Elimination Systems; LID: Low Impact Development; Caltrans: California Department of Transportation; RCB: reinforced concrete box; RAP: Remedial Action Plan; ACM: asbestos-containing materials; LBP: lead-based paint; RHNA: Regional Housing Needs Assessment; NBR-PC: Newport Banning Ranch Planned Community Development Plan; SCAG: Southern California Association of Governments; MPAH: Orange County Master Plan of Arterial Highways; SCAQMD: South Coast Air Quality Management District; AQMP: Air Quality Management Plan; NOx: nitrogen oxide; MM: mitigation measure; VOC: volatile organic compound; CO: carbon monoxide; VMT: vehicle miles traveled; O₃ ozone; TAC: toxic air contaminants; GHG: greenhouse gas; MTCO₂e/yr: metric tons of carbon dioxide equivalent per year; dBA: A-weighted decibels; CNEL: Community Noise Equivalent Level; RWQCB: Regional Water Quality Control Board.

**TABLE 7-3
 COMPATIBILITY COMPARISON OF ALTERNATIVES WITH PROJECT OBJECTIVES**

Project Objective	Project	Alternatives					
		A	B	C	D	E	F
		No Build	Open Space & Community Park	No North Bluff Road Extension	Reduced Footprint & 1,200 DU	Reduced Footprint & 1,375 DU	Increased Open Space/ Reduced Footprint
1. Provide a Project that implements the goals and policies that the Newport Beach General Plan has established for the Banning Ranch area.	●	○	●	●	●	●	●
2. Preservation of a minimum of 50 percent of the Project site as open space to be used for habitat conservation, interpretive trails, and development of public parks to meet the recreational needs of the community without the use of public funds.	●	○	●	●	●	●	●
3. Development of a residential village of 1,375 residential units, offering a variety of housing types in a range of housing prices, including provision of affordable housing to help meet the City's Regional Housing Needs Assessment (RHNA).	●	○	○	●	◐	●	●
4. Development of 75 overnight accommodations in a small resort inn including ancillary facilities and services such as a spa, meeting rooms, shops, bars, and restaurants that would be open to the public.	●	○	○	●	○	○	○
5. Development of 75,000 square feet of retail commercial uses oriented to serve the needs of local residents and visitors utilizing the resort inn and the coastal recreational opportunities provided as part of the Project.	●	○	○	●	●	●	◐
6. Development of a land use plan that (1) provides a comprehensive design for the community that creates cohesive neighborhoods promoting a sense of identity with a simple and understandable pattern of streets, a system of pedestrian walkways and bikeways that connect residential neighborhoods, commercial uses, parks, open space and resort uses; (2) reduces overall vehicle miles travelled; (3) integrates landscaping that is compatible with the surrounding open space/habitat areas and that enhances the pedestrian experience within residential areas; and (4) applies architectural design criteria to orient residential buildings to the streets and walkways in a manner that enhances the streetscape scene.	●	○	○	●	●	●	●
7. Provide for roadway improvements to improve and enhance regional circulation, minimize impacts of Project development on the existing circulation system, and enhance public access while not developing more roadways than are needed for adequate regional circulation and coastal access.	●	○	●	●	●	●	●
8. Provide enhanced public access in the Coastal Zone through a system of pedestrian walkways, multi-use trails, and on-street bikeways designed to encourage walking and biking as an alternative to the use of automobiles by providing connectivity among residential, commercial, park, open space, and resort uses within the Project site and to existing adjacent open space, hiking and biking trails, the beach, and the Pacific Ocean.	●	○	◐	●	◐	◐	◐
9. Provide for the consolidation of oil resource extraction and related recovery operations in locations that minimize impacts to sensitive habitat areas and promote compatibility with development of the remainder of the property for residential, resort, commercial, park, and open space uses.	●	○	●	●	●	●	●
10. Provide for the restoration and permanent preservation of habitat areas through implementation of a Habitat Restoration Plan (HRP) for the habitat conservation, restoration, and mitigation areas ("Habitat Areas") as depicted on the Master Development Plan.	●	○	◐	●	●	●	●
11. Provide for long-term preservation and management of the Habitat Areas through the establishment of a conservation easement or deed restriction and the creation of an endowment or other funding program.	●	○	◐	●	●	●	●
12. Expand public recreational opportunities within the Coastal Zone, by providing sites suitable for development by the City of a public Community Park and associated parking, and through development of publicly accessible parks and trails as part of the Project.	●	○	●	●	●	●	●
13. Improve the existing arroyo drainage courses located within the Project site to provide for higher quality habitat conditions than exist prior to the time of Project implementation.	●	○	◐	●	●	●	●
14. Implement a Water Quality Management Program within the Project site that will utilize existing natural treatment systems and that will improve the quality of urban runoff from off-site and on-site sources prior to discharging into the Santa Ana River and the Semeniuk Slough.	●	○	○	●	●	●	●
15. Implement fire protection management solutions designed to protect development areas from fire hazards, to preserve sensitive habitat areas, and to create fire-resistant habitat restoration areas within currently denuded, invasive-species laden, and/or otherwise degraded areas.	●	○	◐	●	●	●	●
16. Provide compatibility between the Project and existing adjacent land uses.	●	○	●	●	●	●	●
Legend: ● = Fully Implements ◐ = Partially Implements ○ = Does Not Implement							

7.5.1 ALTERNATIVE A: NO PROJECT

Description of the Alternative

Section 15126.6(e)(2) of the State CEQA Guidelines (14 CCR) specifies the following:

The “no project” analysis shall discuss the existing conditions at the time the Notice of Preparation [NOP] is published, at the time environmental analysis is commenced, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.

Section 15126.6(e)(3)(B) of the State CEQA Guidelines indicates that when the project is not a land use or regulatory plan, the “no project” alternative

is the circumstance under which the project does not proceed. Here the discussion would compare the environmental effects of the property remaining in its existing state against environmental effects which would occur if the project is approved. If disapproval of the project under consideration would result in predictable actions by others ... this “no project” consequence should be discussed.

Alternative A assumes existing conditions on the Project site and the continuation and possible expansion of oil exploration and oil production operations within the constraints of the existing California Coastal Act regulatory exemption for petroleum production.² No uses other than oil operations would occur on the Project site. Further oil consolidation, clean up, and remediation would not occur for the foreseeable future, and public access would not be provided. At the eventual cessation of oil production operations, well abandonment and removal of certain surface equipment and pipelines would occur in accordance with applicable State and local requirements. This Alternative would not require any of the following: (1) an amendment to the City of Newport Beach General Plan or Orange County MPAH; (2) a zone change; (3) a Coastal Development Permit; or (4) any of the other actions associated with the proposed Newport Banning Ranch Project. Approximately 361 acres of the 401.1-acre site within the City’s Sphere of Influence would not be annexed into the City of Newport Beach.

The Project site is an active oilfield operation that has been in active operation since the mid-1940s. Existing oil operations include 489 oil well sites and related oil facility infrastructure, including pipelines, storage tanks, power poles, machinery, improved and unimproved roadways, buildings, and oil processing facilities. Of the approximately 489 oil well sites, the City operates 16 wells and an oil processing facility near the southwestern boundary of the Project site, as accessed from West Coast Highway near the southwest corner of the Project site. The remainder of the oil wells are operated by West Newport Oil Company.

Oil operations are subject to existing Coastal Commission Exemption E-7-27-73-144. It is anticipated that oil production would continue on the Project site for an additional 30 to 40 years.

² The majority of the Project site is within the County of Orange jurisdiction, which does not have any restrictions on expanded oil exploration. With the No Project/No Development Alternative the site would not be annexed into the City of Newport Beach; therefore, the City restrictions on new oil exploration would not be applicable. New and replacement wells are drilled, as necessary, as part of ongoing oil operations. Though the precise number and location of new and replacement wells is not known, it is reasonable to assume that continued drilling would occur as part of the No Project Alternative within the parameters of the Coastal Development Permit Exemption.

It is also assumed that no permits or approvals would be required for this Alternative since it reflects a continuation of the existing uses.

Comparative Analysis of Environmental Impacts

Land Use and Related Planning Programs

The No Project Alternative (Alternative A) would not create any new development or cause increases in the resident population of the City. Therefore, there would be no impact associated with Threshold 4.1-1, which pertains to physically dividing an established community. As with the proposed Project, this impact is considered less than significant for Alternative A. However, this Alternative does avoid the significant and unavoidable land use compatibility impacts associated noise and night lighting associated with the proposed Project.

Alternative A assumes the 361 acres within County jurisdiction would not be annexed to the City of Newport Beach. Therefore, the City General Plan policies would not be applicable to the majority of the Project site. However, since the Project site is within the City's Sphere of Influence, the City General Plan has been developed with the vision that the Newport Banning Ranch property would be developed consistent with City land use designations and zoning. Not annexing the Project site would conflict with applicable land use policies that have assumed that Newport Banning Ranch would become part of the City. In addition, it would conflict with the Local Agency Formation Commission (LAFCO) policy that encourages the elimination of unincorporated islands through annexation. The Project site would not provide for visitor-serving or recreational land uses that have been assumed in the General Plan. This Alternative would be inconsistent with the land use policies of the General Plan. For Threshold 4.1-2, Alternative A would have greater impacts than the proposed Project.

Aesthetics and Visual Resources

Under the Alternative A scenario, the existing land uses would continue, with possible expansion of oil exploration and oil production operations within the constraints of the Project site's existing California Coastal Act regulatory exemption for petroleum production. The City does not have any designated scenic vistas, and West Coast Highway is not a State- or locally designated scenic highway. Therefore, Alternative A would not result in an adverse effect on a scenic vista (Threshold 4.2-1). As determined in Section 4.2, Aesthetics, the proposed Project would have no impact on a scenic vista.

Under this Alternative, the aesthetic character of the Project site would not change substantially. Alternative A would not result in topographical changes or modifications to the Project site. There would be fewer visual changes to the Project site than those anticipated to occur under the proposed Project. While there could be areas that may convert from natural vegetation to oil exploration/production as a result of ongoing oilfield operations, the overall character of the area would remain the same. While Alternative A would reduce the change to visual character of the Project site compared to the proposed Project, the impact for both the proposed Project and Alternative A would remain less than significant (Threshold 4.2-2). Additionally, it should be noted that Alternative A does not provide for enhancement or restoration of the Project site.

Because Alternative A would not involve development of the Project site, no impacts related to light and glare would occur, and no impacts associated with Threshold 4.2-3 would occur. The proposed Project would result in increased lighting on the Project site; this is considered a significant and unavoidable impact. Since there would be no light or glare introduced as part of

Alternative A, this Alternative would eliminate the significant, unavoidable night lighting impact associated with the proposed Project.

This Alternative would not meet the goals and policies as well as the proposed Project would. Though Alternative A would not alter the existing conditions on site, it would not meet the long-term goals of enhancing the public viewsheds. The site would remain relatively undeveloped; it would continue to operate as an oilfield, and would not be publically accessible. Though City General Plan policies would not be applicable to this Alternative because the majority of the Project site would remain within County jurisdiction, overall it could marginally be found to be consistent with the intent of the aesthetic resources goals and policies of the *City of Newport Beach General Plan* and the California Coastal Act (Threshold 4.2-4).

Geology and Soils

With Alternative A, some on-site grading would occur associated with ongoing oilfield operations and potential new drilling. However, substantially less grading would occur under Alternative A than would be associated with the proposed Project. This Alternative would not expose people or structures to substantial adverse effects from rupture of a known earthquake fault (Threshold 4.3-1); seismic ground shaking (Threshold 4.3-2); seismic-related ground failure, including liquefaction (Threshold 4.3-3); landslides (Threshold 4.3-4). Additionally, it would not be located on a geologic unit or soil that is unstable (Threshold 4.3-6). Because there would be limited on-site grading and no new development on the Project site, minimal soil erosion or the loss of topsoil (Threshold 4.3-5), except to the extent occasioned by permitted oil operations and exploration, would be expected. Though the proposed Project would utilize Best Management Practices (BMPs) to minimize soil erosion and loss of topsoil, Alternative A would result in less impacts of this nature than the proposed Project.

On-site soils have a low to medium expansion potential; however, because there would be such limited on-site grading, this Alternative would not create substantial risks to life or property from expansive soils (Threshold 4.3-7). Impacts with Alternative A would be less than those associated with the proposed Project, which would minimize impacts through compliance with the proposed Mitigation Program.

Though with this alternative scenario, the majority of the Project site would not be within the jurisdictional boundaries of the City of Newport Beach, to ensure the analysis is comparable to that done for the other alternatives, a consistency evaluation with applicable General Plan policies from the Natural Resources Element and Safety Element and the California Coastal Act was conducted (Threshold 4.3-8). The applicable policies pertain to requirements associated with siting new development on the Project site and preserving the site's natural topography and features as a visual resource. This Alternative would only result in on-site grading associated with ongoing oilfield operations, and it would not create new development on the Project site. Both Alternative A and the proposed Project would be consistent with applicable policies.

The geotechnical impacts associated with the proposed Project would be reduced to less than significant levels; the impacts with Alternative A would be less than with the proposed Project because no construction activities are proposed.

Hydrology and Water Quality

Alternative A assumes that limited on-site grading would occur associated with ongoing oilfield operations and potential new drilling. However, substantially less grading would occur under Alternative A than would be associated with the proposed Project. Although not to the same

extent as the proposed Project, there may be an increase in impervious surface or runoff and the concentration of pollutants in storm water runoff may occur with Alternative A; however, it is reasonable to assume that source-control and treatment-control BMPs would be required to reduce impacts. Though Alternative A would result in fewer impacts from disturbance on site, it would not provide the beneficial effects associated with natural treatment of runoff from off site. The proposed Project incorporates two water quality basins (one in the Community Park and one in the Open Space Preserve) to treat off-site urban runoff from Costa Mesa and Newport Beach, as well as from the Project site (PDF 4.4-1). As a result, Alternative A would have greater potential water quality impacts than the proposed Project (Thresholds 4.4-1, 4.4-6, 4.4-11, 4.4-12, and 4.4-13).

Although this Alternative would not involve changes to any existing drainage patterns, the potential for an incremental increase in erosion on the Project site exists due to the additional on-site grading that would likely be associated with ongoing oilfield operations and potential new drilling. However, compared to the proposed Project, potential impacts would be less with Alternative A (Thresholds 4.4-3 and 4.4-15).

This Alternative would not create any new development on the Project site; therefore, it would not deplete groundwater supplies or interfere with groundwater recharge. Though the proposed Project would not draw on local groundwater, groundwater recharge would decrease under Project conditions due to a reduction in pervious surface area. Therefore, Alternative A would have fewer potential impacts than the proposed Project on groundwater levels. Impervious surfaces may increase as a result of ongoing oilfield operations, which would result in an increase in peak flow runoff or runoff volumes from the site; however, they would not increase to the same extent as the proposed Project (Thresholds 4.4-2, 4.4-4 and 4.4-14). This Alternative would generally maintain the current storm flow conditions and would not create or contribute runoff water that would affect the capacity of existing or planned storm water drainage systems. The proposed Project would implement improvements to the storm drain system. With the Project, peak flow rates would be less than those in the existing condition and the storm drain would experience reduced flood loading compared with the existing condition. Therefore, though the impacts would be less than significant, Alternative A would have greater impacts on the storm drain system than the proposed Project because it would not provide any improvements (Threshold 4.4-5).

The proposed Project housing would be located outside the 100-year floodplain. Since this Alternative would not include any new structures, no development or new land uses would be placed within a 100-year floodplain. Both the proposed Project and Alternative A would have no impacts pursuant to Thresholds 4.4-7 and 4.4-8.

The Project site is located at the lower end of the watershed and is not located within any dam inundation areas. As with the proposed Project, this Alternative would not result in development and/or structures, people, and/or structures would not be exposed to significant risk associated with the failure of a levee or dam (Threshold 4.4-9).

There are no permanent standing water bodies in the Upland area, and inundation by tsunami is not likely because of Project site elevations and the City's existing Emergency Management Plan. Therefore, this Alternative would not be subject to inundation by seiche, tsunami, or mudflow. In addition, Alternative A does not propose any structures that would be affected by inundation or mudflows; therefore, the impacts would be less than the proposed Project (Threshold 4.4-10).

Alternative A would not implement City policies established to protect water quality of natural water bodies or promote pollution prevention. However, it should also be noted that, with this Alternative, the majority of the Project site would continue to be outside the jurisdictional limits of the City since annexation would not occur. This Alternative would not implement the other General Plan policies associated with water quality enhancement as outlined in Table 4.4-25, City of Newport Beach General Plan Consistency Evaluation, and Table 4.4-26, California Coastal Act Consistency Analysis (Threshold 4.4-16). This Alternative would also continue the current condition of allowing untreated runoff to enter the Semeniuk Slough and Lowland area. For this threshold, Alternative A would have greater impacts than the proposed Project.

Hazards and Hazardous Materials

Alternative A would allow for minor ground disturbance activities associated with ongoing oilfield operations; however, potential impacts related to Thresholds 4.5-1 and 4.5-2—which pertain to the creation of hazards associated with the transport, use, disposal and/or emissions of hazardous materials and location on an identified hazardous materials site—would be less than the proposed Project because any increase in operations would be minimal. Alternative A would not modify ongoing operations, nor would it provide for the consolidation and remediation of a majority of the site in the near term. However, remediation would be required consistent with State and local requirements upon the future cessation of oilfield activities. The degree of cleanup is determined by the future use of a property.

There would be no substantial change in emissions or generation of wastes in proximity to existing schools; however, the proposed Project's grading and site remediation processes could potentially result in the release of contaminants, predominantly hydrocarbons, into the air during soil disturbance due to aeration during handling (i.e., earth moving) of the contaminated soils. Therefore, this Alternative would have fewer impacts than the proposed Project (Threshold 4.5-3). However, Alternative A would not provide for the consolidation of oil operations, which would move oil extraction activities further from the existing schools or site remediation. The Project site is not identified on the Cortese List, which is compiled pursuant to Section 65962.5 of the *California Government Code* (Threshold 4.5-4).

Threshold 4.5-5 pertains to consistency with any applicable plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. The majority of the Project site would not be within the City's jurisdictional limits because this Alternative does not propose annexation. The evaluation of consistency with applicable City policies has been prepared to provide a comparison with the proposed Project. The No Project Alternative would not implement applicable policies because it would not provide for the consolidation of oilfield activities for the remediation of the site. The policies, which were outlined in Table 4.5-5, City of Newport Beach General Plan Consistency Evaluation, call for (1) the prohibiting new oil and gas extraction activities; (2) the consolidating and/or relocating existing oil operations; (3) limiting hazards associated with oil operations; and (4) assessing and, if necessary, remediating soil and groundwater contamination. This Alternative would be inconsistent with provisions of the General Plan. For this threshold, Alternative A would have greater impacts than the proposed Project.

Biological Resources

Alternative A would not result in on-site grading associated with new development and would not create any new development on the Project site; however, it could include the continuation and possible expansion of oil exploration and oil production operations consistent with existing permits and approvals. By not developing the Project site, impacts on special status species

would be less than the proposed Project due to the limited nature of site disturbance that would occur. With Alternative A, there would be no substantial adverse effect on special status species (Threshold 4.6-1). However, it cannot be stated that there would be no impacts because the continuation and possible expansion of oil exploration/production is anticipated to continue to degrade the existing habitat that supports special status species. These impacts could be considered significant depending on the extent of unforeseen exploration and production activities. In addition, the proposed Project includes revegetation of native habitat areas, including, but not limited to, coastal sage scrub and vernal pools. These habitat types, along with several others on site, have been impacted on site and throughout their range by invasive non-native plant species. The proposed Project revegetation has the potential to result in a higher long-term habitat quality (i.e., invasive species removed, human activity and disturbance related to oilfield operations removed, and larger blocks of contiguous native habitat). However, because Alternative A does not provide for any mechanism to require revegetation of native habitats on site or to remove invasive non-native species, implementation of Alternative A would allow for the continued decline of the native plant and wildlife species on site due to the lack of required active resource management. Therefore, in the long-term, this Alternative would have potentially greater impacts to these resources than would the proposed Project.

Due to the lack of development proposed, Alternative A would not involve a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game (CDFG), the U.S. Fish and Wildlife Service (USFWS), or the U.S. Army Corps of Engineers (USACE) (Thresholds 4.6-2 and 4.6-3). However, as discussed above, the continuation and possible expansion of oil exploration/production would continue to degrade the existing riparian and sensitive habitat areas. These impacts could be considered significant depending on the extent of unforeseen exploration and production activities. However, since impacts to riparian habitat would require mitigation, it is assumed these impacts would be reduced to less than significant levels. Presumably, there would be the ability to minimize impacts to riparian habitat with Alternative A because the oil drilling operations would not require as much site disturbance as the proposed Project. Therefore, the impacts would be less than those of the proposed Project.

This Alternative would not create any new development on the Project site; therefore, it would not interfere with the movement of any native resident or migratory wildlife corridors, nor would it impede the use of native wildlife nursery sites (Threshold 4.6-4). Therefore, Alternative A would have fewer impacts than the proposed Project for Thresholds 4.6-4.

As with the proposed Project, this Alternative would also not conflict with any local policies or ordinances protecting biological resources or provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan (Threshold 4.6-5).

Population, Housing, and Employment

Alternative A would not (1) create any new jobs; (2) involve the development of additional housing; or (3) cause increases in the resident population of the City. Therefore, there would be no impact associated with Threshold 4.7-1, which pertains to inducing substantial population growth. This impact is considered less than significant with the proposed Project.

Threshold 4.7-2 pertains to consistency with any applicable plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. The General Plan identifies the Newport Banning Ranch site as a location within the City that can provide opportunities for residential development. This Alternative would not provide any housing opportunities to assist

the City in meeting their Regional Housing Needs Assessment (RHNA) goals, whereas the proposed Project, if approved, would provide housing and has provisions to help to meet the City's affordable housing requirements.

The General Plan Housing Element identifies several areas where land use changes may be anticipated over the next 20 years, including new residential opportunities. In addition to the Newport Banning Ranch site, new residential development is expected to occur as infill housing and replacement of previously permitted retail and office development capacity. The key opportunity areas identified in the Housing Element are Newport Banning Ranch, Corona del Mar, West Newport Mesa, Mariner's Mile, Balboa Peninsula, Dover Drive/Westcliff Drive, Newport Center, the Balboa Peninsula, and Airport Area. With Alternative A, the City would need to ensure that these remaining areas (i.e., the above-listed except for Newport Banning Ranch) provide housing opportunities, including affordable housing. Given the near-built-out nature of the City, elimination of housing on the Newport Banning Ranch site would require a greater concentration of housing, including affordable housing, in these locations.

As discussed in Section 4.7 of this EIR, the proposed Project's 1,375 units represent approximately 36 percent of the City's total new housing between 2010 and 2035 as projected by California Demographic Research. The Project represents approximately 48 percent of the City's total new units as projected by the City's General Plan by 2025 (between 2010 and 2025). This could be accommodated only by increasing the density elsewhere in the City. Increasing density elsewhere may require a General Plan Amendment(s). The City Charter Section 423 requires a vote if the number of dwelling units in any statistical area is increased by more than 100. Therefore, Alternative A is not as effective as the proposed Project at meeting the City RHNA goals if Newport Banning Ranch is not developed with housing.

Alternative A would not provide the open space and recreational opportunities envisioned by the Open Space designation on the General Plan and it would not provide the housing and employment uses envisioned by the Residential Village designation. This Alternative would not conflict with California Coastal Act provision pertaining to population and housing; however, it would not provide for any visitor-serving uses. Therefore, Alternative A would have greater impacts than the proposed Project for Threshold 4.7-2.

Recreation and Trails

Because Alternative A would not involve the generation of a new residential population, no impacts to existing recreational facilities would occur. Since this Alternative would not provide for the development of any recreational facilities, there would be no impacts associated with Thresholds 4.8-1, 4.8-2, and 4.8-3, which all pertain to physical impacts associated with construction of recreational facilities or accelerated physical deterioration associated with increased use of existing facilities. There would be fewer impacts under this Alternative on the Project site than with the proposed Project, which would result in impacts associated with the provision of new parkland. However, if this Alternative were selected for implementation, the housing and population envisioned under the General Plan for the Project site would have to be located elsewhere in the City. Based upon the Alternative locations discussed above in which these housing units would be developed (see Population, Housing and Employment discussion above), the City would be less able to accommodate recreational facilities as compared to the proposed Project.

With Alternative A, the Project site would not be annexed into the City. Therefore, the City policies would not be applicable to the majority of the Project site. The evaluation of policy consistency (Threshold 4.8-4) has been provided because the City General Plan has assumed

that the property would become part of the City of Newport Beach and function to meet long-term recreational needs in the City. The General Plan's Land Use Policy 6.5.2 identifies the need for a Community Park to be located on the Project site, which would not occur under Alternative A. In addition, by not providing any development, this Alternative would not implement the other General Plan policies associated with recreational enhancement. The policies, which were outlined in Table 4.8-3, City of Newport Beach General Plan Consistency Evaluation, call for enhancing visitor-serving uses; providing a network of trails to connect neighborhoods with Community Parklands and natural habitats; and providing improved recreational facilities within the City. This Alternative would be inconsistent with provisions of the General Plan. For this threshold, Alternative A would have greater impacts than the proposed Project.

Transportation and Circulation

Under this scenario, no new traffic would be generated by development of the Project site and no roads would be constructed through or onto the Project site.³ With the exception of limited vehicular trips onto the Project site associated with existing oilfield operations, no vehicular trips would be generated. There is no public access on the site.

Existing Conditions

Within the traffic study area, all intersections are currently operating at an acceptable level of service (i.e., level of service [LOS] D or better) except for the three Costa Mesa intersections listed below (intersections numbered as identified in Section 4.9, Transportation and Circulation).

- 26. Newport Boulevard at Victoria Street/22nd Street (AM: LOS E)
- 36. Newport Boulevard at Harbor Boulevard (PM: LOS E)
- 37. Newport Boulevard at 18th Street/Rochester Street (PM: LOS E)

The Congestion Management Plan (CMP) intersection of Newport Boulevard at West Coast Highway is operating at LOS D in the AM peak hour and LOS B in the PM peak hour. As such, this intersection is currently operating at an acceptable level of service based on CMP criteria.

With respect to State Highway intersections in the traffic study area, all intersections are currently operating at an acceptable level of service (LOS C or better) except for the following intersection in the City of Costa Mesa:

- 26. Newport Boulevard at Victoria Street/22nd Street, (AM: LOS D)

Existing Plus Project

With Alternative A, the findings for the *Existing Plus Project* scenario would be the same as the Existing Conditions because there no additional traffic would be generated by Alternative A. With the proposed Project there would be greater impacts because in addition to the existing deficiencies (Intersections 26, 36, and 37), the Superior Avenue at 17th Street intersection (Intersection No. 43) declines from an acceptable to an unacceptable LOS.

³ This assumption is consistent with the definition of a No Project Alternative. Although no roads would be constructed through or onto the Project site, this Alternative would not preclude future implementation of the roadways.

2016 Cumulative

The intersections listed below are forecasted to operate at deficient levels of service in 2016 without development on the Project site.

City of Newport Beach

9. Newport Boulevard at West Coast Highway (AM: LOS E)

City of Costa Mesa

26. Newport Boulevard at Victoria Street/22nd Street (AM: LOS F)
36. Newport Boulevard at Harbor Boulevard (PM: LOS F)
37. Newport Boulevard at 18th Street/Rochester Street (PM: LOS F)

Because Alternative A would not generate any additional traffic, these deficiencies would not be associated with implementation of this Alternative. By comparison, with the addition of proposed Project-related traffic, the following eight intersections would be impacted:

City of Newport Beach

9. Newport Boulevard at West Coast Highway (AM: LOS E)

City of Costa Mesa

28. Monrovia Avenue at 19th Street (AM: LOS E)
34. Newport Boulevard at 19th Street (PM: LOS E)
36. Newport Boulevard at Harbor Boulevard (PM: LOS F)
37. Newport Boulevard at 18th Street/Rochester Street (PM: LOS F)
42. Pomona Avenue at 17th Street (PM: LOS F)
43. Superior Avenue at 17th Street (PM: LOS E)
44. Newport Boulevard at 17th Street (PM: LOS E)

In addition, Newport Boulevard at Victoria Street/22nd Street (intersection 26) would operate at a deficient LOS; however, this would not be as a result of Project related traffic.

General Plan Buildout

Under the *General Plan Buildout* scenario for Alternative A, the intersections listed below are forecasted to operate at a deficient LOS without any new development.

City of Huntington Beach

19. Magnolia Street at Pacific Coast Highway (PM: LOS F, no Project impact)

City of Costa Mesa

34. Newport Boulevard at 19th Street (AM: LOS F, Project Impact: 0.011)
36. Newport Boulevard at Harbor Boulevard (PM: LOS F, Project impact: 0.011)
37. Newport Boulevard at 18th Street/Rochester Street (PM: LOS F, no Project impact)

- 44. Newport Boulevard at 17th Street (PM: LOS E, no Project impact)
- 48. Irvine Avenue at 17th Street (PM: LOS E, no Project impact)

Since Alternative A would not generate any additional traffic, these impacts would not be associated with Alternative A. With the addition of Project-related traffic, two of the six intersections would have Project related impacts: Newport Boulevard at 19th Street and Newport Boulevard at Harbor Boulevard.

Significant and unavoidable impacts to intersections in the Cities of Newport Beach and Costa Mesa would not occur under Alternative A because no additional traffic would be generated from the property. Therefore with respect to Threshold 4.9-1, no impact would occur associated with Alternative A.

This Alternative would also not conflict with the CMP (Threshold 4.9-2). As with the proposed Project, Alternative A would not substantially increase hazards due to a design feature, incompatible land uses, or inadequate emergency access (Threshold 4.9-3). No parking impacts would occur (Threshold 4.9-4).

With respect to Threshold 4.9-5, which addresses consistency with transportation-related plans, policies, and regulations, Alternative A would not implement the City of Newport Beach General Plan Circulation Element's Master Plan of Streets and Highways or the Orange County MPAH. The Master Plan of Streets and Highways and the Orange County MPAH depict a north-south roadway through the Project site. This road would not be constructed under this Alternative.

15th Street currently terminates at Monrovia Avenue and is designated on the City's General Plan and the Orange County MPAH as a Primary (four-lane divided) west of Bluff Road. Between Bluff Road and Monrovia Avenue, the City classifies it as a Primary and the Orange County MPAH as a Secondary. The City depicts the westerly extension of 15th Street to West Coast Highway through the Project site. As a part of the proposed Project, the deletion of the extension of 15th Street from the Master Plan of Streets and Highways is proposed. Under this Alternative, however, the 15th Street extension would not be constructed. The Project's traffic analysis (see Section 4.9) has determined that a second road connection through the Project site to West Coast Highway is not required.

Extending 16th Street from its existing western terminus onto the Project site would not occur as a part of this Alternative. The proposed Project assumes an amendment to the Orange County MPAH to delete a second road through the Project site to West Coast Highway. The Orange County MPAH identifies this second roadway connection from 17th Street westerly to West Coast Highway. This would not occur under Alternative A.

Because Alternative A does not propose to implement any of the planned facilities, an amendment to these planning documents is not proposed. This Alternative would not preclude the future implementation of the roadways. However, it would have greater impacts with policy consistency than the Project because it would result in substantial delays in the implementation of the improvements proposed in circulation planning documents.

Air Quality

With Alternative A, because there would be no development, there would be no exceedance of the assumptions used to develop the SCAQMD Air Quality Management Plans (AQMPs); Alternative A would not conflict with or obstruct implementation of either the SCAQMD AQMPs

(Threshold 4.10-1) or other applicable policies of agencies with jurisdiction over the Project (Threshold 4.10-6).

Under Alternative A, there would be minimal activities associated with construction equipment operations or fugitive dust generation; also, there would not be long-term use of natural gas, consumer products, landscape equipment, or vehicles associated with development of residential and commercial land uses. The possible expansion of oil exploration and production could produce both temporary and long-term emissions of pollutants. It would be speculative to estimate the magnitude of emissions from increased oilfield activities, but it may be assumed that (1) temporary exploration and installation emissions would be substantially less than the emissions estimated for constructing the proposed Project, which are provided in Table 4.10-7, Estimated Maximum Daily Construction Emissions: Unmitigated; (2) long-term stationary source emissions would be limited by South Coast Air Quality Management District (SCAQMD) permit requirements; and (3) increased long-term mobile source emissions for oilfield operations would be substantially less than the emissions estimated for vehicles that would operate after completion of the first phase of the proposed Project, which were found to be less than significant (Table 4.10-9).

The impacts for Alternative A pursuant to Thresholds 4.10-2 and 4.10-3 would be less than for the proposed Project. There would be no emissions that would violate any air quality standard or contribute substantially to an existing or projected air quality violation (Threshold 4.10-2); or result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is in nonattainment under applicable National or California Ambient Air Quality Standards (NAAQS or CAAQS, respectively) (Threshold 4.10-3); There would be no significant air quality impacts under this Alternative, whereas the proposed Project would have significant and unavoidable impacts during construction (Threshold 4.10-2) and long-term operation (Threshold 4.10-3).

With the proposed Project there would be no toxic air contaminant (TAC) emissions from on-site commercial activities or exposure of on-site residents to TACs (Threshold 4.10-4). Since Alternative A does not propose any development there would be no impacts associated with TAC. Additionally, neither the proposed Project nor Alternative A would create objectionable odors affecting a substantial number of people (Threshold 4.10-5).

Greenhouse Gas Emissions

Under Alternative A, there would be no construction activities or associated construction equipment operations or development of residential, park, and commercial land uses. Thus, there would be no short-term greenhouse gas (GHG) emissions from construction activities or long-term GHG emissions from vehicles or the consumption of electricity, natural gas, and water associated with operations of residential, recreational, and commercial land uses. The possible expansion of oil exploration and production would result in temporary and long-term emissions of GHGs; these emissions would be substantially less than the threshold of 6,000 metric tons of carbon dioxide equivalent per year (MTCO₂e/yr) and substantially less than the amount forecasted for the proposed Project (Threshold 4.11-1). However, it should be noted that the proposed Project would be providing housing in a jobs-rich area, which would help offset an incremental portion of the regional emissions. Neither the proposed Project nor Alternative A would conflict with applicable plans, policies, or regulations adopted for the purpose of reducing GHG emissions (Threshold 4.11-2).

Noise

With Alternative A, there would be no construction activities or associated construction equipment operations or development of residential, park, and commercial land uses. Thus, there would be no construction noise impacts or long-term impacts from vehicles or stationary sources associated with operation of residential, recreational, and commercial land uses. The possible expansion of oil exploration and production could cause temporary noise impacts depending on the location and hours of drilling. Because of the distance from the oilfields to existing residences and the temporary nature of the drilling, the impacts would be less than significant. There would be no substantial temporary or permanent increase in noise levels (Thresholds 4.12-2 and 4.12-4) or exposure of persons to or generation of noise or vibration levels in excess of standards (Thresholds 4.12-1 and 4.12-3). Therefore, Alternative A would have fewer impacts compared to the proposed Project, which would have potential significant and unavoidable impacts associated with construction and operations.

The Project site is not within an airport land use plan or near a private airstrip; there would be no impacts from excessive aircraft noise levels (Thresholds 4.12-5 and 4.12-6). Alternative A noise levels would not conflict with policies applicable to the Project (Threshold 4.12-7). Overall, impacts of Alternative A related to noise would be less than the proposed Project.

Cultural and Paleontological Resources

Under Alternative A, the Project site would remain in its current condition and no direct or indirect impacts to surrounding historic resources would occur (Threshold 4.13-1). Because Alternative A would not involve excavation or grading activities beyond possible expansion of oil exploration and oil production operations, the potential to discover previously unidentified archaeological (Threshold 4.13-2) or paleontological resources (Threshold 4.13-3) would be reduced compared to the proposed Project. For this same reason, Alternative A would have a reduced potential for disturbance of human remains, including those interred outside formal cemeteries (Threshold 4.13-4). The impacts to cultural resources with Alternative A would be less than that of the proposed Project.

Threshold 4.13-5 pertains to consistency with any applicable plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. Since this Alternative assumes the Project site would not be annexed, the City's policies would not be applicable. However, Alternative A would not conflict with applicable land use, historic resource, or natural resource policies because it would not disturb known cultural resource sites. As a result, similar to the proposed Project, this Alternative would be consistent with provisions of the General Plan.

Public Services and Facilities

The public services and facilities evaluated in the EIR include the following: Fire Protection, Police Protection, Schools, Library Services, and Solid Waste. Because Alternative A would not involve new development, no impacts to these public services and facilities would occur. Since this Alternative would not provide for the development of any fire protection, police protection, schools, library services, or solid waste facilities, there would be no impacts associated with Thresholds 4.14-1 (fire services), 4.14-3 (police services), 4.14-5 (schools), 4.14-7 (library services), or 4.14-9 (solid waste), which all pertain to physical impacts associated with construction of new public service facilities or accelerated physical deterioration associated with increased usage of existing facilities. For all services, Alternative A would have less impact than the proposed Project.

Thresholds 4.14-2 (fire services), 4.14-4 (police services), 4.14-6 (schools), 4.14-8 (library services), and 4.14-10 (solid waste) pertain to consistency with any applicable plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Alternative A would not provide the infrastructure, nor would it implement the vision for the site provided for in the General Plan. However, it would be a continuation of the existing use and would not generate demand for the additional infrastructure. Continuation of the existing use does not preclude implementation of service improvements off site (i.e., the site would not be a missing link to services needed elsewhere in the City). However, the proposed Project would provide fuel modification on the eastern boundary of the Project site, which would provide further protection to existing homes in the City of Costa Mesa. However, it is assumed that adequate protection was incorporated into the design when the existing housing was approved by the City of Costa Mesa. Though the City General Plan policies would not be applicable to the majority of the Project site because it would not be annexed into the City, neither the proposed Project nor Alternative A would not conflict the City's policies with regard to public services and facilities.

Utilities

The utilities evaluated in the EIR include the following: water, wastewater facilities, and energy (electricity and natural gas). Because Alternative A would not involve the generation of a new residential population, no impacts to water, wastewater facilities, or energy would occur. Since this Alternative would not provide for the development of any water, wastewater facilities, or energy facilities, there would be no impacts associated with Thresholds 4.15-1 and 4.15-7, which both pertain to physical impacts associated with construction of water and energy facilities or accelerated physical deterioration associated with increased usage of existing facilities. In addition, since there would be no generation of a new residential population, demand for water, wastewater facilities, and energy service would not be required and there would be no impacts associated with Thresholds 4.15-2, 4.15-4, and 4.15-5 which pertain to water supplies, wastewater treatment requirements, and infrastructure capacity. The impact would be less than with the proposed Project, which would generate a need for these resources.

Thresholds 4.15-3, 4.15-6, and 4.15-8 pertain to consistency with any applicable plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. This Alternative assumes the site would not be annexed into the City; therefore, the City's policies would not be applicable to the majority of the Project site. However, since the General Plan does assume the Newport Banning Ranch would ultimately be part of the City, a policy evaluation has been provided for consistency. Alternative A would not implement the policies identified for the Newport Banning Ranch site; however, the policies pertain to when development occurs on the site (i.e., implement adequate infrastructure, sustainable development practices, implement the Sewer System Management Plan and the Sewer Master Plan). The continuation of the existing uses on the Newport Banning Ranch site would not adversely affect these goals from being met elsewhere in the City. Therefore, as with the proposed Project, there would not be an impact associated with policy consistency for Alternative A or the proposed Project (Thresholds 4.15-3, 4.15-6, and 4.15-8).

Conclusion

Alternative A would have fewer impacts than the proposed Project pertaining to potential aesthetic impacts, geotechnical constraints, hydrology and water quality, biological impacts, potential exposure of the public to hazardous materials (construction only), traffic, air quality, greenhouse gasses, noise, cultural resources, and impacts associated with the construction of public services, utilities, and recreational facilities. It should be noted that saying Alternative A

would have fewer impacts in these areas than the proposed Project does not imply that these impacts would be significant and unavoidable for the proposed Project. The City's General Plan establishes a goal and policies for the Project site to be remediated and recreational opportunities to be provided, which would not be met with Alternative A. However, as Alternative A assumes no annexation to the City, the City's General Plan policies would not apply to the majority of the Project site. Additionally, both local and regional planning programs have assumed circulation system improvements would be provided on site. This Alternative also does not provide for fulfillment of housing goals established by RHNA.

Significant and Unavoidable Impacts

The City of Newport Beach has assumed the Project site would ultimately be annexed to the City and has adopted land uses and policies accordingly. Alternative A would have greater impacts than the proposed Project when evaluating consistency with City plans and policies. However, since with this Alternative the site would not be annexed into the City of Newport Beach the City planning programs would not be applicable to the majority of the site. This Alternative would not have any impacts that are significant and unavoidable, whereas the proposed Project would have significant and unavoidable impacts associated with land use compatibility (due to noise and lighting impacts), aesthetics, transportation, air quality, cumulative greenhouse gas emissions, and noise. The significant and unavoidable impacts of the proposed Project are summarized in Section 7.3.2, Elimination/Reduction of Significant Impacts.

Feasibility and Ability to Meet Project Objectives

In the short-term, Alternative A is potentially feasible, at least from a technological and legal perspective, as it contemplates the continuation of the existing oil operations. Because the property is privately owned and the extent of petroleum production activities will eventually cease when resources are depleted or when it becomes uneconomical to continue extraction activities with diminishing returns, some form of reuse of the Project site is expected to ultimately occur. Therefore, long-term economic feasibility of this Alternative is questionable.

When evaluating the desirability and feasibility of an Alternative, it is also important to evaluate the ability of the Alternative to meet the project objectives. An Alternative does not need to meet *all* the project objectives to be considered potentially feasible. As outlined in Table 7-3, Comparison of Alternatives with Project Objectives, Alternative A does not meet any of the project objectives.

7.5.2 ALTERNATIVE B: GENERAL PLAN OPEN SPACE DESIGNATION

Description of the Alternative

The Newport Beach General Plan Update was adopted by the City Council on July 25, 2006, and the land use plan was approved by the voters on November 6, 2006. The *City of Newport Beach General Plan* establishes criteria and standards for land use development in the City as well as its Sphere of Influence. The Project site is designated as Open Space/Residential Village, OS(RV) (see Exhibit 3-6, Newport Beach Land Use Designations). The OS(RV) land use designation allows for both a Primary Use (open space) and an Alternative Use (residential village) of the site as described below:

Primary Use:

Open Space, including significant active community parklands that serve adjoining residential neighborhoods if the site is acquired through public funding.

Alternative Use:

If not acquired for open space within a time period and pursuant to terms agreed to by the City and property owner, the site may be developed as a residential village containing a mix of housing types, limited supporting retail, visitor accommodations, school, and active community parklands, with a majority of the property preserved as open space. The property owner may pursue entitlement and permits for a residential village during the time allowed for acquisition as open space.

The *City of Newport Beach General Plan Land Use Element* prioritizes the acquisition of the Project site for open space. As described in the General Plan, the open space acquisition option would include consolidation of oil operations; restoration of wetlands; the provision of nature education and interpretative facilities and an active park containing playfields and other facilities to serve residents of adjoining neighborhoods; and the construction of the north-south Primary Road⁴ (Bluff Road/North Bluff Road) that extends from West Coast Highway to of 19th Street, with connections to two east/west arterial roadways (15th Street and 17th Street). With this Alternative, the City would be responsible for implementing the Community Park, including the acquisition of the 31.3 acres of land designated for this use. However, the acquisition of the remaining portion of the site, as well as funding of all remaining improvements and maintenance, would be the responsibility of a yet unknown third party. In addition to costs associated with site acquisition, funds would also be required to initiate consolidation of oil operations and to address oilfield abandonment and clean-up needs as well as acceptance and mitigation of any long-term liability exposure. Additional funding would be required to implement restoration and long-term management of sensitive habitats and to construct park(s), roadways, and other needed infrastructure (including sewer, water, electrical, gas and storm drain facilities) to support the park(s) and roadways.

For purposes of the CEQA analysis in this EIR, the City has prepared a conceptual plan for Alternative B to depict how permitted uses could be sited; the conceptual plan is depicted on Exhibit 7-1, Alternative B: Open Space Alternative. Table 7-4 identifies the land uses and acreage associated with the allowable land uses. The Community Park would have both active

⁴ **Primary Road:** A primary road/primary arterial highway is usually a four-lane, divided roadway. A primary arterial is designed to accommodate 30,000 to 45,000 Average Daily Trips (ADT) with a typical daily capacity of 34,000 vehicles per day (VPD) (Newport Beach 2006).

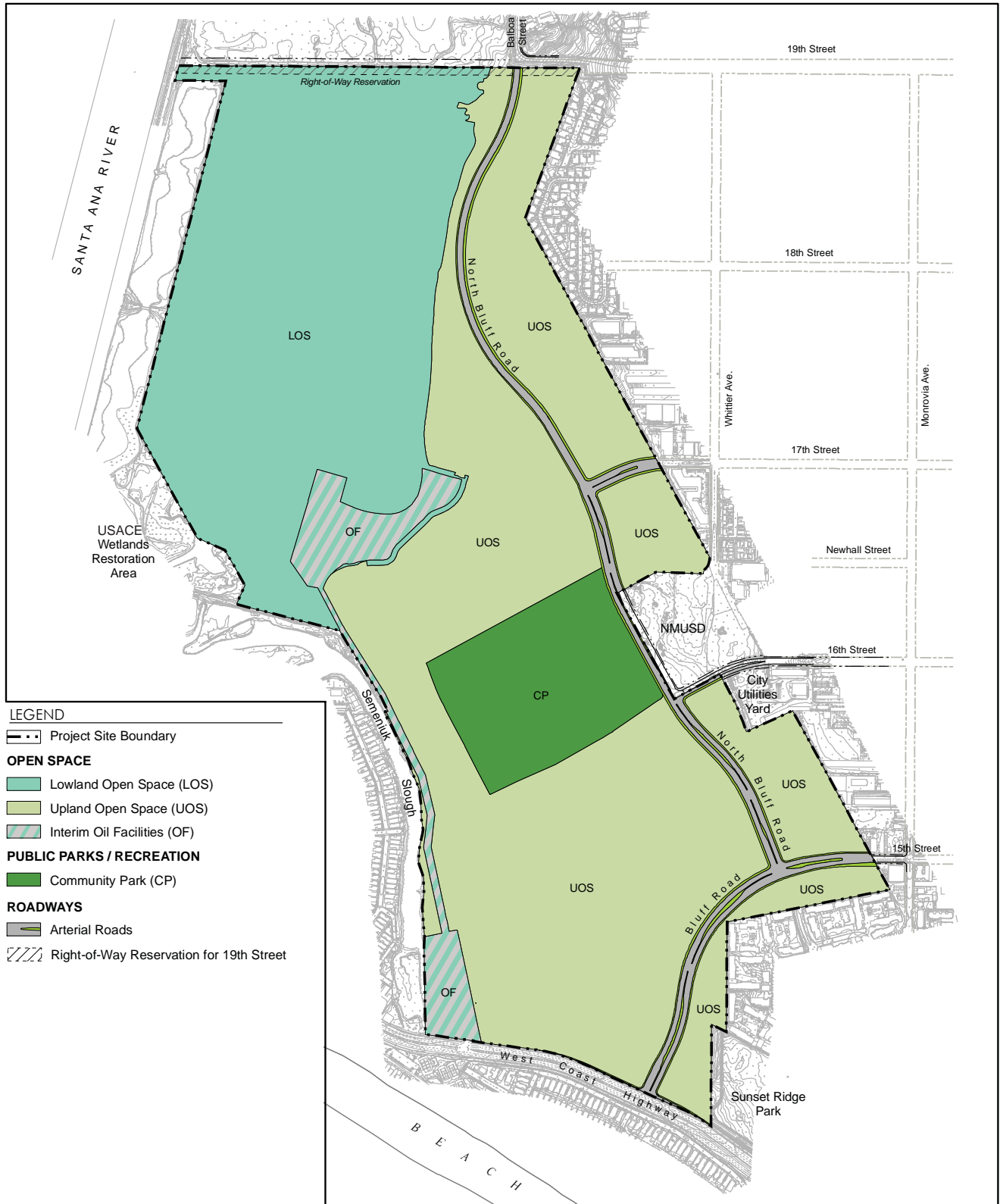
and passive park uses, consistent with the policies of the General Plan. Facilities in the park could include picnicking; sports fields (soccer, baseball, and softball) and hard courts (basketball and/or tennis) that are proposed to be lighted; tot lot(s); open play turf areas; a skate park; picnic facilities; trails, restrooms; and other facilities. Parking would be provided within the park.

**TABLE 7-4
ALTERNATIVE B: GENERAL PLAN – OPEN SPACE DESIGNATION
STATISTICAL SUMMARY**

Land Use District		Gross Acres ^a	Planned Dwelling Units	Maximum Permitted Commercial sf	Maximum Resort Inn Rooms
Open Space					
LOS	Lowland Open Space ^b	130.6	–	–	–
UOS	Upland Open Space ^{b,c}	222.7	–	–	–
OF	Interim Oil Facilities ^d	16.5	–	–	–
<i>Subtotal Open Space</i>		<i>369.8</i>	–	–	–
Public Parks/Recreation					
CP	Community Park	31.3	–	–	–
<i>Subtotal Public Parks/Recreation</i>		<i>31.3</i>	–	–	–
Total Project		401.1	0	0	0
sf: square footage Note: totals are rounded. ^a Gross acres are measured to centerlines of all public roads where such roads are shown on the plan. Gross acres are computed using geographic information system (GIS) technology with accuracy to 10 decimal places. Acres are shown in this table to one decimal place. ^b The Right-of-Way Reservation for the 19 th St Extension contains approximately 3.1 acres. ^c Gross acres for the Upland Open Space District may include fuel management zones. ^d The Interim Oil Facilities (Open Space Land Use) District includes: (1) the existing oil operations site near West Coast Highway; (2) the oil consolidation site near the middle of the Lowland; and (3) an oil access road (non-exclusive easement) connecting the two working sites.					

As noted, this Alternative includes the construction of roadway segments through the Project site consistent with the City of Newport Beach Circulation Element. These roadways are: (1) a north-south road with a southern terminus at West Coast Highway and extending to a northern terminus at 19th Street (Bluff Road and North Bluff Road); (2) the extension of 15th Street from its existing terminus to Bluff Road within the Project site; and (3) the extension of 17th Street from its existing terminus to North Bluff Road within the Project site. Consistent with the roadway assumptions for the proposed Project, North Bluff Road (extending from 17th Street to 19th Street) would transition from a four-lane divided to a two-lane undivided road to 19th Street. A right-of-way reserve for the extension of 19th Street is assumed as part of the Project; however, similar to the proposed Project, this segment of 19th Street is assumed to be constructed at some point in the future.

In light of the traffic analysis prepared for the proposed Project and the limited land uses associated with this Alternative, Alternative B assumes the deletion of the future extension of a second road through the Project site and its connection to West Coast Highway. The circulation network proposed for the Project would also be proposed for Alternative B. This would require an amendment to the Circulation Element to revise Figure CE1, Master Plan of Streets and Highways, and an amendment to the Orange County MPAH.



Source: FORMA 2011

Alternative B: Existing General Plan – Open Space Alternative

Exhibit 7-1

Newport Banning Ranch EIR



Bonterra
CONSULTING

As with the proposed Project, implementation of Alternative B would require a pre-annexation amendment to the *City of Newport Beach General Plan*. The following modifications to the General Plan would also be required in order to conform figures and text to Alternative B, as described below.

1. Amend the *General Plan's* Sphere of Influence (SOI) map to modify the City boundary to include the Newport Banning Ranch site (refer to Figure I2, Sphere of Influence [SOI]).
2. Amend the *General Plan* to reflect the circulation system. Specifically, amend the Master Plan of Streets and Highways to delete the segment of 15th Street west of Bluff Road, which would provide a second arterial through the Project site connecting to West Coast Highway as shown on General Plan Circulation Element Figure CE1, Master Plan of Streets and Highways.

Though this Alternative only proposes the development of the Community Park, the area of impact would also include area for the construction of roadways and oil remediation. As indicated in Table 7-4, Alternative B: General Plan – Open Space Designation Statistical Summary, public roads would be provided for in the Open Space designation. The remediation of the site would require disturbance throughout the Project site, though these impacts would be temporary.

Anticipated approvals for implementation of Alternative B would include the actions described below.

City of Newport Beach

- Approve the General Plan Sphere of Influence (SOI) map and Circulation Element Amendment.
- Approve infrastructure and utility plans, landscaping and park plans, as well as grading and building permits for the park uses.
- Review and approve remediation and habitat restoration plans developed by a third party, and issue grading permits for these activities and for roadway development.

Federal

- Dependent on the precise oil remediation plans and park design, a Section 404 permit for impacts to “Waters of the U.S.” from the USACE and a Section 7 Consultation with the USFWS for listed species would likely be required with Alternative B.

State

- A Water Quality Certification under Section 401 of the Federal Clean Water Act and approval for the oil well/facility abandonment and site remediation program would likely be required.
- A Section 1602 Streambed Alteration Agreement is anticipated for impacts to CDFG jurisdiction.
- A Coastal Development Permit from the Coastal Commission would be required for Alternative B to initiate restoration activities, construct roadways and infrastructure, and develop the Community Park.

- An Encroachment Permit would be required for activities within the California Department of Transportation's (Caltrans') right-of-way, including the development the Bluff Road/West Coast Highway intersection.
- The California Department of Conservation, Division of Oil, Gas and Geothermal Resources would need to approve site remediation activities.

Regional and Special Districts

- The Local Agency Formation Commission would need to approve annexation of the site into the City of Newport Beach.

County

- The Orange County Transportation Authority (OCTA) would need to approve the amendment to the Orange County MPAH.
- The Orange County Health Care Agency (OCHCA) would need to approve activities related to oil well/facility abandonment and site remediation.

Comparative Analysis of Environmental Impacts

Land Use and Related Planning Programs

The General Plan Open Space Designation Alternative would result in new land uses on the Project site, including nature education and interpretative facilities and an active park containing playfields and other facilities to serve residents of adjoining neighborhoods. Although the Project site is surrounded by established communities of residential development, the Project site itself is an active oilfield and there are no public uses or access to the site. Therefore, there would be no impact associated with Threshold 4.1-1, which pertains to physically dividing an established community; this is the same as the proposed Project.

Threshold 4.1-1 also evaluates the compatibility of the development with surrounding land uses. As with the proposed Project, some homes in the Newport Crest development contiguous to the Project site would be affected by vehicular noise from Bluff Road and night lighting from the Community Park. Mitigation for the vehicular noise impact is proposed for the Project and would be applicable to Alternative B. However, as with the proposed Project there would be potential land use compatibility impacts that would remain significant if the residents of Newport Crest elect not to have the mitigation measures for vehicular noise impacts implemented. Similar to the proposed Project, the impact from night lighting at the Community Park would be considered a significant, unavoidable impact.

Threshold 4.1-2 pertains to consistency with any applicable plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. The General Plan contains land use policies that call for the provision of visitor-serving uses. Although visitor accommodations in the resort inn would not be provided by this Alternative, this Alternative would still be considered consistent with the General Plan because the Open Space Alternative was identified in the General Plan as the preferred land use option. Both the proposed Project and Alternative B would be considered consistent with General Plan policies and other applicable planning documents pertaining to land use.

Aesthetics and Visual Resources

Under both the proposed Project and Alternative B, no impacts would occur related to degrading the views from a scenic highway corridor since no scenic highways exist in the Project area. As with the proposed Project, Alternative B would not result in an adverse effect on a scenic vista because there are no designated scenic vistas in the General Plan (Threshold 4.2-1).

Visual changes to the Project site associated with the implementation of Alternative B would be reduced compared to those anticipated to occur under the proposed Project, due to the absence of residential and visitor-serving land uses. With the proposed Project, the oil consolidation area and the resort inn would be prominent visual elements from West Coast Highway, a public location with views of the Project site. With Alternative B, the oil consolidation area would be visible, and the resort inn would be eliminated. This would result in an open space visual character with Alternative B. This would be a reduction in the visual impact associated with Alternative B compared to the proposed Project.

A majority of the Project site would be preserved as open space. In addition, a 31.3-acre Community Park would be located in the center of the site (compared to the proposed Project where it would be located south of Bluff Road and north and east of North Bluff Road). The Community Park would offer both active and passive park uses and would provide nighttime lighting. Under Alternative B, oilfields could be consolidated, potentially resulting in natural vegetation being converted to oil exploration/production. Because the majority of the Project site would not be developed, the overall undeveloped character of the site would be similar to existing conditions. However, the remediation/restoration component of Alternative B would result in a visually enhanced site. Alternative B would not result in significant topographic or aesthetic impacts (Threshold 4.2-2). No significant aesthetic impacts were identified for the proposed Project, and no significant aesthetic impacts would occur under this Alternative.

The proposed Project would result in increased lighting on the Project site; this is considered a significant and unavoidable impact. Alternative B would result in less of an impact than the proposed Project since a majority of the proposed Project would be preserved as open space. However, similar to the proposed Project, the Community Park is anticipated to have night lighting of active sports fields which could result in light spillover onto adjacent properties (Threshold 4.2-3). While the Community Park is not immediately adjacent to residential uses as in the proposed Project, Alternative B would result in increased light effects on upland open space as compared to the proposed Project. Both the proposed Project and Alternative B, the night lighting impact would remain significant and unavoidable impact. Similar to the proposed Project, at the time the General Plan was prepared, the City had considered its needs and determined there was a need for active park and states that ball fields at the Community Park would be lighted. The City of Newport Beach General Plan Final EIR found that the introduction of new sources of lighting associated with development of the site would be considered significant and unavoidable. In certifying the General Plan Final EIR and approving the General Plan project, the City Council approved a Statement of Overriding Consideration which notes that there are specific economic, social, and other public benefits that outweigh the significant and unavoidable impacts associated with the General Plan project. Therefore, as with the proposed Project, the conclusions for Alternative B with respect to night lighting are consistent with the General Plan Findings of Fact and Statement of Overriding Considerations.

Like the proposed Project, Alternative B would be consistent with the intent of the aesthetic resources goals and policies of the *City of Newport Beach General Plan* and the California Coastal Act (Threshold 4.2-4).

Geology and Soils

The Project footprint for Alternative B, the General Plan-Open Space Designation Alternative, (allowing for daylight cut and fill slopes along the roads and park area) is approximately 40 percent of the proposed Project footprint. Another consideration is that the Community Park would not require the same amount of corrective grading (except where structures are expected) as the proposed Project. A 60 percent reduction in the mass excavation and a 75 percent reduction in the corrective grading quantity would be expected for this Alternative.

As indicated in Section 4.3, Geology and Soils, the Project site is located in a seismically active area with faults within the proposed development site that could not be proven to be inactive. Though any development would potentially be exposed to the effects of seismic activity, development associated with this Alternative would not be located on these fault areas and would be subject to fault setback zones (Thresholds 4.3-1 and 4.3-2). Compared to the proposed Project, there would be fewer impacts associated with these thresholds because there would be fewer structures and people on site.

This Alternative would be located on the Upland, avoiding soils with liquefaction or lateral spreading potential (Thresholds 4.3-3 and 4.3-6). As with the proposed Project, corrective grading in the Upland area would provide uniform bearing conditions for the proposed park facilities and would offset the effects of collapsible and compressible soils. Compared to the proposed Project, there would be fewer impacts associated with these thresholds because there would be fewer structures and people on site.

As with the proposed Project, Alternative B would be subject to some existing on-site potential for landslides under dynamic seismic conditions. Consistency with the California Building Code (CBC), City building code requirements, and General Plan policies along with the incorporation of bluff setback zones would ensure that impacts associated with on- and off-site landslides would be less than significant (Threshold 4.3-4). Because of the smaller development footprint, there would be fewer impacts under Alternative B associated with this threshold than the proposed Project.

As with the proposed Project, grading activities associated with Alternative B would increase the potential for soil erosion and loss of topsoil (Threshold 4.3-5). With the incorporation of construction BMPs as described in Section 4.4, Hydrology and Water Quality, impacts on soil erosion and loss of topsoil would be less than significant. Post-construction, soil erosion and the loss of topsoil would be minimized through the use of engineered grading, surface drainage improvements, and landscaping. Impacts associated with the proposed Project and Alternative B would be less than significant. Because of the smaller development footprint and less overall grading, Alternative B impacts associated with this threshold would be less than the proposed Project.

On-site soils have a low to medium expansion potential. As with the proposed Project, incorporation of standard conditions of approval (SCs) would reduce this Alternative's impacts from expansive soils to a less than significant level (Threshold 4.3-7). Because of the smaller development footprint, Alternative B impacts associated with this threshold would be less than the proposed Project.

Alternative B, as well as the proposed Project would be consistent with the intent of the soils and geology-related goals and policies of the *City of Newport Beach General Plan* and the California Coastal Act (Threshold 4.3-8).

Hydrology and Water Quality

Alternative B would result in some on-site grading and development on the Project site. There would be a less impervious surface with this Alternative than the proposed Project. Therefore, potential impacts associated with the runoff and the concentration of pollutants in storm water runoff would be less than significant and less than the proposed Project (Thresholds 4.4-1, 4.4-6, 4.4-11, 4.4-12, and 4.4-13). However, the proposed Project proposes to implement a Water Quality Management Program, which will use existing natural treatment systems, in order to improve the quality of urban runoff from off-site and on-site sources prior to discharging into the Santa Ana River and the Semeniuk Slough compared to the existing condition. Therefore, although Alternative B would not generate the same level of pollutants as the proposed Project, it would not provide for the cleanup of existing urban runoff from off-site areas, and the untreated runoff from off-site areas would continue to flow into Semeniuk Slough. Therefore, Alternative B would not provide the same net benefit to water quality as the proposed Project.

This Alternative would involve changes to the existing drainage patterns; however, with implementation of BMPs consistent with permit requirements, impacts associated with increased erosion would be less than significant (Thresholds 4.4.3 and 4.4-15). Compared to the proposed Project, Alternative B would result in fewer impacts due to the reduced scale of land development. As with the proposed Project, these impacts would be less than significant.

This Alternative would result in less impervious surface than the proposed Project. As with the proposed Project, it is not anticipated that Alternative B would result in significant impacts to groundwater supplies or interfere with groundwater recharge (Threshold 4.4.2). When compared to the proposed Project, the level of impact associated with Alternative B would be less because it includes fewer structures and paved areas. As with the proposed Project, this impact would be less than significant.

While this Alternative would increase impervious surfaces, impacts to increases in peak flow runoff and runoff volumes from the site would be less than significant and less than the proposed Project (Thresholds 4.4-4 and 4.4-14). Runoff from this Alternative would not affect the capacity of existing or planned storm water drainage systems (Threshold 4.4-5). When these impacts are compared to the proposed Project, Alternative B would result in fewer impacts because less development is proposed. These impacts would be less than significant.

This Alternative would not include housing development, so no housing would be placed within a 100-year floodplain (Thresholds 4.4-7 and 4.4-8) and there would be no significant risk associated with the failure of a levee or dam because it is not within an inundation area for such facilities (Threshold 4.4-9).

As with the proposed Project, this Alternative would not be subject to inundation by seiche, tsunami, or mudflow (Threshold 4.4-10).

Alternative B would not conflict with applicable land use policies (Threshold 4.4-16). As with the proposed Project, this Alternative would be consistent with the Harbor and Bay Element, Natural Resources Element, and Safety Element goals and policies, which were outlined in Table 4.4-25, City of Newport Beach General Plan Consistency Evaluation, and the relevant California Coastal Act policies which were outlined in Table 4.4-26, California Coastal Act Consistency Analysis.

Hazards and Hazardous Materials

As discussed in Section 4.5, Hazards and Hazardous Materials, with implementation of the identified Mitigation Program, potentially significant impacts related to the historical and continuing oil operations on the Project site and the potential presence of asbestos-containing materials (ACMs) and lead-based paint (LBP) in some structures would be reduced to a level considered less than significant.

Alternative B would result in some on-site grading and development on the Project site and it would require implementation of a Remedial Action Plan (RAP), which would include remediation associated with consolidation of oilfield activities. Therefore, like the proposed Project, with implementation of the Mitigation Program, this Alternative would result in less than significant impacts related to Thresholds 4.5-1 and 4.5-2, which pertain to the creation of hazards associated with the transport, use, disposal, and/or emissions of hazardous materials and location on an identified hazardous materials site. However, because the proposed Project would result in greater development, it would require use of more materials that have been identified as potentially hazardous. Even though both Alternative B and the proposed Project would both have less than significant impacts for Thresholds 4.5-1 and 4.5-2, the impacts associated with Alternative B would be incrementally less.

Long-term operations of Alternative B would not emit hazardous emissions within ¼ mile of a school; however, the Alternative may result in the need to establish off-site haul routes during on-site remedial activities. Alternative B would involve less disturbance of soils that require remediation than the proposed Project. However, there would also be less opportunity to deep bury contaminated soils or mix the soil with uncontaminated soil, thereby reducing the concentration of contaminants. As a result, there is the potential that greater amounts of soil would be hauled off site. However, this cannot be known at this time. Implementation of SCs would provide for impacts to be considered less than significant. This is consistent with the finding for the proposed Project (Threshold 4.5-3).

The Project site is not identified on the Cortese List, which is compiled pursuant to Section 65962.5 of the *California Government Code*. Therefore, there would be no impact associated with Threshold 4.5-4 for either the proposed Project or Alternative B.

Threshold 4.5-5 pertains to consistency with any applicable plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. The General Plan-Open Space Designation Alternative would not conflict with applicable land use, harbor and bay, natural resource, and safety policies because it would provide for the consolidation of oilfield activities and remediation of the site, the same as the proposed Project. The policies, which were outlined in Table 4.5-5, City of Newport Beach General Plan Consistency Evaluation, call for (1) prohibiting new oil and gas extraction activities; (2) consolidating and/or relocating existing oil operations; (3) limiting hazards associated with oil operations; and (4) assessing and, if necessary, remediating soil and groundwater contamination. This Alternative would be consistent with provisions of the General Plan. For this threshold, this Alternative and the proposed Project would have no impacts.

Biological Resources

Although there would be more Open Space associated with this Alternative compared to the proposed Project, the Open Space Alternative would still result in a substantial amount of permanent and temporary impacts to biological resources through implementation of parks, roads, and remediation activities. The Open Space Alternative would result in a substantial

adverse effect on special status plant and wildlife species (Threshold 4.6-1). Although these impacts are expected to be less than the proposed Project, they are still considered significant. As discussed in Section 4.6, Biological Resources, with implementation of the identified mitigation measures, potentially significant impacts to special status species from the Open Space Alternative would be reduced to a level considered less than significant.

This Alternative would involve a substantial adverse effect on riparian habitat (especially within Drainages A, B, and C) and other sensitive natural communities (e.g., coastal sage scrub) (Thresholds 4.6-2 and 4.6-3). Although these impacts are expected to be less than the proposed Project, they are still considered significant. As discussed in Section 4.6, Biological Resources, with implementation of the identified Mitigation Measures, potentially significant impacts to special status habitats from the Open Space Alternative would be reduced to a level considered less than significant.

The General Plan Open Space Designation Alternative would create a limited amount of permanent new development in the form of on-site roads and active park facilities. This limited development is not expected to interfere with the movement of any native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites (Threshold 4.6-4). The impact would be less for Alternative B than for the proposed Project. Similar to the proposed Project, this Alternative would also not conflict with any local policies or ordinances protecting biological resources or provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan (Threshold 4.6-5).

Population, Housing, and Employment

The General Plan Open Space Designation Alternative would not create any new jobs; involve the development of additional housing; or cause an increase in the resident population of the City. As a result, there would be no impact associated with Threshold 4.7-1 related to inducing substantial population growth. There would be fewer impacts with this Alternative than with the proposed Project.

Because Alternative B does not propose any housing on site, it would not assist the City of Newport Beach in meeting their RHNA goals. Whereas Alternative B does not propose any housing units, the proposed Project, if approved, would provide housing, including affordable housing, that would allow the City to help meet its RHNA requirements. If Alternative B is selected, this housing would need to be provided elsewhere in the City. The General Plan identifies other locations within the City that can provide additional opportunities for residential development. However, the City may need to amend its General Plan to increase the density of development allowed in these locations, or ensure that these areas provide sufficient housing, including affordable housing, on a City-wide basis. As a result, this impact is considered greater with Alternative B than with the proposed Project. This Alternative would be generally consistent with the California Coastal Act provision pertaining to population, housing, and employment.

Recreation and Trails

This Alternative would not involve the generation of a substantial number of new jobs; it would not involve the development of additional housing; nor would it cause increases in the resident population. Therefore, impacts associated with physical impacts to recreational resources (Thresholds 4.8-1, 4.8-2, and 4.8-3) would be less than the proposed Project.

Because Alternative B provides for a Community Park and other recreational facilities, like the proposed Project, it would be consistent with the intent of the applicable land use goals and policies of the *City of Newport Beach General Plan*, which states that additional parkland is needed within the West Newport Service Area (Threshold 4.8-4). Specifically, the Newport Beach General Plan's Land Use Policy 6.5.2, Active Community Park states, "Accommodate a Community Park of 20 to 30 acres that contains active playfields that may be lighted and is of sufficient acreage to serve adjoining neighborhoods and residents of Banning Ranch, if developed" and the Recreation Element's Goal R 1, Provision of Facilities, states, "Provision of adequate park and recreation facilities that meet the recreational needs of existing and new residents of the community".

Transportation and Circulation

Under this Alternative, the only developed land use would be a 31.3-gross-acre Community Park. Vehicular access to the park would be provided by roads constructed through the Project site as previously described for this Alternative. Although this Alternative would not generate a substantial number of trips, it would modify current traffic patterns in the area. A portion of the existing traffic in the area, which is currently dependent on Superior Avenue and Newport Boulevard to get to West Coast Highway, is expected to use roadways through southwest Costa Mesa to take advantage of the new Bluff Road connection to West Coast Highway.

Intersection Levels of Service: Table 7-5 identifies the peak hour Intersection Capacity Utilization (ICU)/delay values and the corresponding levels of service for the traffic study area intersections at General Plan buildout assuming development of the Project site consistent with the Open Space (OS) land use designation. The General Plan Buildout peak hour traffic forecasts were developed by Urban Crossroads using the City's Newport Beach Traffic Model (NBTM). The model assumes buildout of the area and the region according to the General Plans of the City of Newport Beach and surrounding jurisdictions. The table shows that, while there would be no project-related traffic impacts associated with Alternative B, the traffic study area intersections listed below are forecasted to operate at a deficient LOS:

City of Huntington Beach

19. Magnolia Street at Pacific Coast Highway (PM: LOS F)

City of Costa Mesa

34. Newport Boulevard at 19th Street (AM: LOS F)

36. Newport Boulevard at Harbor Boulevard (PM: LOS F)

37. Newport Boulevard at 18th Street/Rochester Street (PM: LOS F)

44. Newport Boulevard at 17th Street (PM: LOS E)

48. Irvine Avenue at 17th Street (PM: LOS E)

Based on the significance criteria set forth in this EIR, two intersections (Newport Boulevard at 19th Street and Newport Boulevard at Harbor Boulevard) in the City of Costa Mesa would be significantly impacted by the proposed Project. While Alternative B would result in lower ICU values as a result of fewer trips generated on the site, this Alternative does not relieve over-capacity conditions at any of the intersections that are forecasted to be deficient at General Plan Buildout. However, these deficiencies are not attributable to Alternative B.

**TABLE 7-5
 ALTERNATIVE B GENERAL PLAN BUILDOUT: INTERSECTION OPERATIONS**

	Intersection		Control	With No Project				With Alternative B				Alternative B Impact			
				AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour		Change		Significant?	
				ICU/Delay	LOS	ICU/Delay	LOS	ICU/Delay	LOS	ICU/Delay	LOS	AM	PM	AM	PM
Newport Beach	1	Monrovia Ave/16 th St	S	0.32	A	0.31	A	0.31	A	0.32	A	-0.013	0.007	No	No
	2	Placentia Ave/15 th St	S	0.43	A	0.59	A	0.49	A	0.57	A	0.065	-0.028	No	No
	3	Superior Ave/15 th St	S	0.38	A	0.46	A	0.51	A	0.50	A	0.129	0.040	No	No
	4	Superior Ave/Placentia Ave	S	0.65	B	0.61	B	0.60	A	0.49	A	-0.050	-0.113	No	No
	5	Newport Blvd/Hospital Rd	S	0.67	B	0.79	C	0.63	B	0.75	C	-0.031	-0.034	No	No
	6	Orange St/West Coast Hwy	S	0.77	C	0.80	C	0.77	C	0.81	D	0.000	0.002	No	No
	7	Prospect St/West Coast Hwy	S	0.90	D	0.85	D	0.90	D	0.83	D	0.000	0.023	No	No
	8	Superior Ave/West Coast Hwy	S	0.85	D	0.81	D	0.89	D	0.80	C	0.040	-0.007	No	No
	9	Newport Blvd/West Coast Hwy	S	0.87	D	0.83	D	0.88	D	0.83	D	0.010	0.003	No	No
	10	Riverside Ave/West Coast Hwy	S	0.72	C	0.87	D	0.73	C	0.88	D	0.008	0.011	No	No
	11	Tustin Ave/West Coast Hwy	S	0.59	A	0.82	D	0.60	A	0.83	D	0.010	0.002	No	No
	12	Dover Dr/West Coast Hwy	S	0.78	C	0.90	D	0.78	C	0.90	D	0.005	0.003	No	No
Huntington Beach	13	Magnolia St/Hamilton Ave	S	0.73	C	0.74	C	0.73	C	0.74	C	0.003	0.004	No	No
	14	Bushard St/Hamilton Ave	S	0.54	A	0.65	B	0.53	A	0.65	B	-0.010	0.002	No	No
	15	Brookhurst St/Hamilton Ave (Victoria St)	S	0.59	A	0.83	D	0.60	A	0.89	D	0.019	0.059	No	No
	16	Magnolia St/Banning Ave	S	0.59	A	0.49	A	0.62	B	0.50	A	0.025	0.012	No	No
	17	Bushard St/Banning Ave	S	0.67	B	0.73	C	0.71	C	0.77	C	0.041	0.047	No	No

TABLE 7-5 (Continued)
ALTERNATIVE B GENERAL PLAN BUILDOUT: INTERSECTION OPERATIONS

Intersection			Control	With No Project				With Alternative B				Alternative B Impact			
				AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour		Change		Significant?	
				ICU/Delay	LOS	ICU/Delay	LOS	ICU/Delay	LOS	ICU/Delay	LOS	AM	PM	AM	PM
Huntington Beach	18	Brookhurst St/Banning Ave	S	0.46	A	0.50	A	0.48	A	0.54	A	0.021	0.032	No	No
	19	Magnolia St/Pacific Coast Hwy	S	0.84	D	1.23	F	0.83	D	1.17	F	-0.014	-0.055	No	No
	20	Brookhurst St/Bushard St	S	0.40	A	0.42	A	0.38	A	0.38	A	-0.026	-0.038	No	No
	21	Brookhurst St/Pacific Coast Hwy	S	0.77	C	0.90	D	0.76	C	0.89	D	-0.009	-0.008	No	No
Costa Mesa	22	Placentia Ave/Victoria St	S	0.74	C	0.82	D	0.72	C	0.81	D	-0.023	-0.016	No	No
	23	Pomona Ave/Victoria St	S	0.69	B	0.82	D	0.69	B	0.81	D	0.000	-0.009	No	No
	24	Harbor Blvd/Victoria St	S	0.66	B	0.79	C	0.65	B	0.78	C	-0.007	-0.016	No	No
	25	Newport Blvd/Victoria St	S	0.48	A	0.43	A	0.48	A	0.44	A	-0.003	0.009	No	No
	26	Newport Blvd /Victoria St (22 nd St)	S	0.86	D	0.53	A	0.86	D	0.53	A	-0.002	0.003	No	No
	27	Whittier Ave/19 th St	S	0.64	B	0.73	C	0.52	A	0.55	A	-0.116	-0.177	No	No
	28	Monrovia Ave/19 th St	S	0.56	A	0.51	A	0.50	A	0.48	A	-0.052	-0.034	No	No
	29	Placentia Ave/19 th St	S	0.60	A	0.58	A	0.55	A	0.57	A	-0.059	-0.011	No	No
	30	Pomona Ave/19 th St	S	0.57	A	0.73	C	0.57	A	0.73	C	0.005	0.003	No	No
	31	Anaheim Ave/19 th St	S	0.58	A	0.66	B	0.57	A	0.66	B	-0.013	0.003	No	No
	32	Park Ave/19 th St	S	0.53	A	0.59	A	0.53	A	0.59	A	-0.003	0.000	No	No
	33	Harbor Blvd/19 th St	S	0.50	A	0.63	B	0.49	A	0.62	B	-0.004	-0.004	No	No
	34	Newport Blvd/19 th St	S	1.07	F	1.01	F	1.06	F	1.01	F	-0.005	0.006	No	No
	35	Newport Blvd/Broadway	S	0.69	B	0.85	D	0.69	B	0.85	D	-0.004	-0.002	No	No
	36	Newport Blvd/Harbor Blvd	S	0.80	C	1.11	F	0.79	C	1.11	F	-0.010	-0.005	No	No
	37	Newport Blvd/18 th St (Rochester St)	S	0.83	D	1.09	F	0.82	D	1.07	F	-0.004	-0.014	No	No
	38	Placentia Ave/18 th St	S	0.52	A	0.54	A	0.45	A	0.47	A	-0.066	-0.066	No	No
39	Whittier Ave/17 th St	S	0.18	A	0.23	A	0.35	A	0.41	A	0.169	0.187	No	No	
40	Monrovia Ave/17 th St	S	0.31	A	0.41	A	0.31	A	0.42	A	-0.002	0.006	No	No	
41	Placentia Ave/17 th St	S	0.40	A	0.56	A	0.36	A	0.47	A	-0.038	-0.097	No	No	

TABLE 7-5 (Continued)
ALTERNATIVE B GENERAL PLAN BUILDOUT: INTERSECTION OPERATIONS

Intersection			Control	With No Project				With Alternative B				Alternative B Impact			
				AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour		Change		Significant?	
				ICU/Delay	LOS	ICU/Delay	LOS	ICU/Delay	LOS	ICU/Delay	LOS	AM	PM	AM	PM
Costa Mesa	42	Pomona Ave/17 th St	S	0.44	A	0.51	A	0.44	A	0.50	A	-0.007	-0.013	No	No
	43	Superior Ave/17 th St	S	0.76	C	0.81	D	0.77	C	0.81	D	0.012	-0.001	No	No
	44	Newport Blvd/17 th St	S	0.80	C	0.92	E	0.80	C	0.91	E	0.007	-0.006	No	No
	45	Orange Ave/17 th St	S	0.41	A	0.62	B	0.42	A	0.61	B	0.012	-0.004	No	No
	46	Santa Ana Ave/17 th St	S	0.43	A	0.51	A	0.41	A	0.51	A	-0.022	-0.002	No	No
	47	Tustin Ave/17 th St	S	0.45	A	0.58	A	0.43	A	0.57	A	-0.022	-0.006	No	No
	48	Irvine Ave/17 th St	S	0.65	B	0.91	E	0.64	B	0.91	E	-0.012	-0.006	No	No
	49	Placentia Ave/16 th St	S	0.26	A	0.32	A	0.25	A	0.32	A	-0.006	-0.007	No	No
	50	Superior Ave/16 th St	S	0.55	A	0.51	A	0.55	A	0.49	A	-0.003	-0.021	No	No
	51	Newport Blvd/16 th St	S	0.68	B	0.75	C	0.68	B	0.75	C	0.000	-0.002	No	No
	52	Bluff Rd/Victoria St	S	0.65	B	0.68	B	0.71	C	0.71	C	0.062	0.034	No	No
53	Bluff Rd/19 th St	S	0.50	A	0.58	A	0.44	A	0.57	A	-0.059	-0.012	No	No	
On-Site	54	Bluff Rd/17 th St	S	N/A				0.56	A	0.65	B	0.563	0.651	No	No
	55	Bluff Rd/16 th St	U					1.90	A	1.90	A	1.900	1.900	No	No
	56	Bluff Rd/15 th St	S					0.31	A	0.51	A	0.312	0.513	No	No
	57	Bluff Rd/W. Coast Hwy	S					0.72	C	0.82	D	0.722	0.823	No	No

ICU: Intersection Capacity Utilization; LOS: level of service; S: Signalized; U: Unsignalized
Notes: Bold and shaded values indicate intersections operating at LOS E or F.
 Intersection operation is expressed in average seconds of delay per vehicle during the peak hour for unsignalized intersections using the HCM 2000 Methodology and is expressed in volume-to-capacity (V/C) for signalized intersections using the ICU Methodology.

Source: Kimley-Horn 2011.

CMP Intersection: The CMP intersection of Newport Boulevard at West Coast Highway is forecasted to operate at LOS D without site development. This intersection would continue to operate at an acceptable LOS. No impact would occur.

Therefore, with respect to Threshold 4.9-1, no impact would occur associated with Alternative B. This Alternative would also not conflict with the CMP (Threshold 4.9-2). As with the proposed Project, Alternative B would not substantially increase hazards due to a design feature, incompatible land uses, or inadequate emergency access (Threshold 4.9-3). The Community Park would be required to provide adequate on-site parking; no parking impacts would occur (Threshold 4.9-4). No mitigation is required for this Alternative.

Alternative B proposes the same General Plan Circulation Element and MPAH Amendment as the proposed Project. These amendments do not reflect a conflict with the policies and goals of the applicable programs; rather, they reflect a refinement to the circulation network to reflect the infrastructure requirements necessary to meet the local and regional mobility goals. With respect to Threshold 4.9-5—which addresses consistency with transportation-related plans, policies, and regulations—both the proposed Project and Alternative B are considered consistent with the intent of the transportation-related goals and policies of the Southern California Association of Governments (SCAG), the *City of Newport Beach General Plan*, and the California Coastal Act.

Air Quality

Under Alternative B there would be construction of roadways and parks with associated construction equipment operations and fugitive dust generation. There would be no long-term use of natural gas, consumer products, or vehicles associated with development of residential and commercial land uses. However, the development of parks would result in some trip generation with associated vehicle use and the use of landscape maintenance equipment.

As with the proposed Project, Alternative B would not conflict with or obstruct implementation of the SCAQMD AQMPs because development would not exceed the assumptions used to develop the AQMPs (Threshold 4.10-1) or other applicable policies of agencies with jurisdiction over the Project (Threshold 4.10-6).

Temporary impacts would result from park and roadway construction and the oilfield remediation activities. The impacts associated with Alternative B would be less than the proposed Project impacts because the magnitude of development would be substantially less. Air pollutants would be emitted by off-road and on-road construction equipment and worker vehicles; fugitive dust would be generated during demolition and grading on the Project site. Other construction activities that emit pollutants include painting, surface coating, and asphalt paving operations. Compliance with SCAQMD Rules is required; specifically, construction would be performed in accordance with Rule 403, Fugitive Dust, which would help minimize impacts. However, the level of activities required for constructing North Bluff Road and Bluff Road, as well as construction of a 31.3 acre Community Park would reasonably result in short-term emissions of NO_x that exceeds the SCAQMD CEQA significance threshold (Threshold 4.10-2). Compliance with the Mitigation Program identified for the proposed Project would require use of Tier 3 equipment and Tier 4 equipment, which could reasonably reduce NO_x emissions below the SCAQMD thresholds.

Air emissions associated with the long-term use of the Community Park would be less than the emissions with proposed Project and less than the SCAQMD CEQA significance threshold values. Alternative B would not result in a cumulatively considerable net increase of any criteria

pollutant for which the Project region is in nonattainment under an applicable NAAQS or CAAQS (Threshold 4.10-3), whereas for the proposed Project these impacts would be significant and unavoidable impacts.

As with the proposed Project, for Alternative B there would be no TAC emissions from on-site activities (Threshold 4.10-4) and the use of the parks and roads included would not create objectionable odors affecting a substantial number of people (Threshold 4.10-5).

Greenhouse Gas Emissions

Under Alternative B there would be construction of roadways and parks with associated construction equipment operations. Thus, there would be one-time GHG emissions from construction activities during the construction years. Long-term GHG emissions from vehicles and the consumption of electricity, natural gas, and water would occur with operation and maintenance of the parks. GHG emissions would be less than the threshold of 6,000 MTCO₂e/yr and substantially less than the forecasted emissions for the proposed Project (Threshold 4.11-1). Neither the proposed Project nor Alternative B would conflict with applicable plans, policies, or regulations adopted for the purpose of reducing GHG emissions (Threshold 4.11-2).

Noise

Under Alternative B roadways and parks would be constructed that would necessitate associated construction equipment operations. Construction noise could cause a substantial temporary increase in noise levels at residences and schools within 500 feet of the roadway and park construction because of existing relatively low ambient noise levels. However, the duration of the impact would be much less than for the proposed Project. Although the impact would be significant and unavoidable, same as the proposed Project, since the duration would be relatively short, the impact associated with Alternative B would be less than the proposed Project (Threshold 4.12-2).

Forecasted cumulative noise levels on existing roadways at General Plan buildout for Alternative B would range from a decrease of less than 1 A-weighted decibel (dBA) to an increase of approximately 3.9 dBA. The noise level changes would be due to a combination of cumulative growth, a redistribution of traffic resulting from building of the Alternative B roads, and new trips generated by the development of park uses. The Project's contribution to noise increases on existing roads would be less than significant (Thresholds 4.12-1 and 4.12-4).

With Alternative B at General Plan buildout, future community noise equivalent levels (CNEL) at the Newport Crest residences facing the Project site would increase from 7 to 15 dBA above existing noise levels, which would be a significant noise impact. However, the noise increases would be between 0.5 and 1 dBA CNEL less than with the proposed Project. Noise-abatement measures could reduce noise to a compatible level, as defined for new development by the General Plan, but the increase would still exceed the significance criterion. Future noise levels at the California Seabreeze and Parkview Circle residences facing the Project site would increase from 0 to 4 dBA CNEL above existing noise levels, which would be a less than significant noise impact. The noise increases would be between 0.5 and 1 dBA CNEL less than with the proposed Project. Future noise levels at the Carden Hall School would increase by less than 1 dBA, which is less than significant and less than the proposed Project (Thresholds 4.12-1 and 4.12-4).

There would be no noise impacts from stationary sources associated with new residential or commercial development for the proposed Project. As discussed for the proposed Project, park design, operating procedures, and noise abatement measures could reduce the noise impact to a less than significant level. Because the proposed Community Park would be further away from existing residences with Alternative B than for the proposed Project and traffic noise levels would be less than those of the proposed Project, and park and open space uses would be compatible with noise levels allowed by the General Plan (Thresholds 4.12-1 and 4.12-4); this would be the same as the proposed Project.

As with the proposed Project, the consolidation of oil exploration and production could cause temporary noise impacts depending on the location and hours of drilling. Because of the distance from the oilfields to existing residences and the temporary nature of the drilling, the impacts would be less than significant and the same as those for the proposed Project. However, with the proposed Project there would be greater overall construction noise impacts because of the amount of development being proposed. The construction noise levels would also extend over a longer period of time for the proposed Project compared to Alternative B. Therefore, Alternative B would have less impact than the proposed Project (Threshold 4.12-2).

The nature of the vibration impacts would be the same as for the proposed Project. However, due to the limited amount of development proposed with Alternative B, they would be of a much shorter duration. As a result the impacts for Alternative B would be less than those associated with the proposed Project. Both the proposed Project and Alternative B would be required to implement the mitigation measure (MM) limiting the use of heavy equipment if construction is planned within 25 feet of an existing structure (Threshold 4.12-3).

The Project site is not within an airport land use plan or near a private airstrip; therefore for both the proposed Project and Alternative B there would be no impacts from excessive aircraft noise levels (Thresholds 4.12-5 and 4.12-6). Both the proposed Project and Alternative B would be consistent with the goals and policies of the *City of Newport Beach General Plan* related to noise (Threshold 4.12-7).

Cultural and Paleontological Resources

As with the proposed Project, development under Alternative B would not impact any known historical resources (Threshold 4.13-1) from the built environment, but would have the potential to impact unknown historical resources. However, since less grading would be required for Alternative B than the proposed Project and less land area would be disturbed, the impacts would be less with the proposed Project.

Alternative B would involve excavation related to park implementation, road construction, and the consolidation of oil operations. Therefore, as with the proposed Project, there is potential for discovery of previously unidentified archaeological (Threshold 4.13-2) or paleontological resources (Threshold 4.13-3). Similar to the historic resources, the impacts would be less with the proposed Project since Alternative B would disturb less land area.

As a result of oil consolidation activities it is anticipated that Alternative B would impact three archaeological sites (CA-ORA-839, CA-ORA-844B, and CA-ORA-906) that have been deemed eligible for listing on the California Register of Historic Resources (CRHR) and National Register of Historic Places (NRHP). CA-ORA-906 would also be disturbed by construction of North Bluff Road. These sites would also be disturbed with the proposed Project. However, since Alternative B disturbance of CA-ORA-839, CA-ORA-844B are only associated with oilfield consolidation activities, there may be greater opportunities to avoid these resources because

mass grading would not be required with implementation of Alternative B. Therefore, the impacts on cultural resources associated with Alternative B would be less than those associated with the proposed Project.

Impacts to CA-ORA-906 are expected to be the same with both Alternative B and the proposed Project. The construction of North Bluff Road would impact the site as the road travels along the bottom and to the west of the bluffs. Road construction would likely completely destroy this archaeological site. The mitigation measures for the proposed Project would also be applicable for Alternative B. Alternative B has the potential for secondary impacts to cultural resources, same as the proposed Project.

There is no indication that there are burials present on the site. However, as with the proposed Project, under Alternative B, there is potential for disturbance of human remains, including those interred outside formal cemeteries (Threshold 4.13-4). However, given the reduced amount of ground disturbance, the likelihood of impacts would be reduced.

Threshold 4.13-5 pertains to consistency with any applicable plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Neither the proposed Project nor Alternative B would conflict with applicable land use, historic resource, or natural resource policies.

Public Services and Facilities

The public services and facilities evaluated in the EIR are fire protection, police protection, schools, library services, and solid waste. The General Plan Open Space Designation Alternative would not create any new jobs; it would not involve the development of additional housing; nor would it cause increases in the resident population of the City. However, because this Alternative would create an active park containing playfields and other facilities to serve residents of adjoining neighborhoods, fire and police protection would be required (Thresholds 4.14-1 and 4.14-3, respectively). Solid waste service would also be required (Threshold 4.14-9). When compared to the proposed Project, police and fire protection and solid waste service demand would be less because park and recreational uses do not require the same level of service as residential development.

Thresholds 4.14-1 (fire services), 4.14-3 (police services), 4.14-5 (schools), 4.14-7 (library services), or 4.14-9 (solid waste) all pertain to physical impacts associated with construction of new public service facilities or accelerated physical deterioration associated with increased usage of existing facilities. As with the proposed Project, under Alternative B the impacts to Thresholds 4.14-1, 4.14-3, and 4.14-9 would be less than significant while there would be no impact to Thresholds 4.14-5 and 4.14-7.

Thresholds 4.14-2 (fire services), 4.14-4 (police services), 4.14-6 (schools), 4.14-8 (library services), and 4.14-10 (solid waste) pertain to consistency with any applicable plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. The General Plan Open Space Designation Alternative is the primary land use alternative for the Newport Banning Ranch site in the General Plan. This Alternative would have limited demand on services such that it would not diminish the ability of the public service providers in meeting the demand for expected growth in other areas of the City, nor would it require substantial resources to be directed to the Project site. Since neither the proposed Project nor Alternative B would conflict with applicable policies, the impacts are expected to be the same for these thresholds.

Utilities

The Utilities evaluated in the EIR include the following: water, wastewater facilities, and energy (electricity and natural gas). The General Plan Open Space Designation Alternative would not cause increases in the resident population of the City. However, because this Alternative would create an active park containing playfields and other facilities to serve residents of adjoining neighborhoods, wastewater and water services would be required with the provision of restrooms, irrigation, and potable water. Therefore, there would be minimal impacts associated with Thresholds 4.15-2 (water supply), 4.15-4 (exceeding wastewater treatment requirements), and 4.15-5 (wastewater treatment capacity). Lighting associated with the park would also require electricity (Threshold 4.15-7). Wastewater, water, and electricity service demands would be considered less than significant and would be less than with the proposed Project. Alternative B would not require new facilities (other than distribution lines) related to water, wastewater, or energy facilities and would not exceed the existing capacity of these services. Impacts associated with Thresholds 4.15-1 (construction of new water treatment facilities) and 4.15-7 (construction of new energy transmission facilities), which both pertain to physical impacts associated with construction of water and energy facilities or accelerated physical deterioration associated with increased usage of existing facilities, would be less than significant. Though the impacts would not be significant for the proposed Project, the impacts would be less with Alternative B because the overall demand generated would be less, which would reduce the demand on existing facilities.

Thresholds 4.15-3 (water), 4.15-6 (wastewater), and 4.15-8 (energy) pertain to consistency with any applicable plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. The General Plan identifies the Open Space Designation as the primary use for the Project site. Therefore, this Alternative would be consistent with land use and natural resource policies; these are outlined in Table 4.15-11, City of Newport Beach General Plan Consistency Evaluation, which identifies the use of sustainable development practices, water conservation, and use of water-conservation devices in the City. Both the proposed Project and Alternative B would be consistent with the applicable General Plan policies.

Conclusion

Alternative B would have fewer impacts than the proposed Project because it would involve less grading and site disturbance. This Alternative would have less demand on public services and utilities. However, this Alternative would not assist the City in meeting its RHNA housing requirements or implementing the General Plan Housing Element.

Significant and Unavoidable Impacts

Alternative B would be able to avoid the significant and unavoidable impacts associated with traffic, air quality, greenhouse gases, and certain noise impacts, when compared to the proposed Project. The following topics would have impacts that could not be reduced to a less than significant level:

- There would be land use incompatibility with respect to night illumination associated with the Community Park and long-term noise impacts on those Newport Crest residences immediately contiguous to the Project site. In addition, there would be a potential long-range noise impacts for residents on 17th Street west of Monrovia Avenue. For noise, though mitigation is proposed, noise impacts would remain significant if the residents of Newport Crest elect not to implement the mitigation measures to reduce the increased

interior noise levels and if the City of Costa Mesa does not implement the recommended measure of resurfacing the street with rubberized asphalt (Threshold 4.1-1).

- Alternative B would introduce nighttime lighting into a currently unlit area. The Community Park is anticipated to have night lighting of active sports fields, which could result in light spillover onto adjacent properties. The night lighting impacts are considered significant and unavoidable. The City of Newport Beach General Plan Final EIR found that the introduction of new sources of lighting associated with development of the site would be considered significant and unavoidable. In certifying the General Plan Final EIR and approving the General Plan project, the City Council approved a Statement of Overriding Considerations, which notes that there are specific economic, social, and other public benefits that outweigh the significant and unavoidable impacts associated with the General Plan project (Threshold 4.2-3).
- Construction of the roadways and park would cause a substantial temporary increase in noise levels at residences and schools within 500 feet of the roadway and park construction because of existing relatively low ambient noise levels. Due to the low existing ambient noise levels, the proximity of the noise-sensitive receptors, and duration of construction activities, the temporary noise increases would be significant and unavoidable (Threshold 4.12-2).

Feasibility and Ability to Meet Project Objectives

This Alternative is deemed to be potentially feasible. That said, the ultimate determination of feasibility is a consideration for the decision makers. In this case, the financial feasibility of this Alternative is dependent upon the ability of a responsible party to obtain sufficient funds to acquire the site and fund clean-up, restoration, and long-term maintenance of the site. Feasibility is also dependent on the City's ability to construct roadways, infrastructure, and recreation improvements. In addition, since no mechanism exists to impose consolidation and clean-up of the oilfield, agreements would have to be negotiated for this to occur.⁵

The City and others have been investigating potential funding sources; however, to date no financing has been identified to implement any component of this Alternative despite efforts by the City to establish a value for the property, efforts to identify sources of funding via open space acquisition consultants, and the efforts of independent groups.

The General Plan identifies the fiscal constraints associated with implementation of this Alternative. The acquisition of the property and implementation of Alternative B, which includes site remediation, would be very expensive. The City has had a pricing study of the Project site prepared by an appraiser, which concluded in January 2009 that the price of the land could range from \$138,000,000 to \$158,000,000, assuming a 25 percent discount if all of the property were to be acquired at once (Buss-Shelger Associates 2008). These prices do not include the cost of clean-up and remediation from the oil operations on the property. The City also retained an open space acquisition consultant, who explored the feasibility of funding for acquisition of the property as open space. The consultant's report in August 2009 found that, in light of economic and State fiscal conditions, there is little likelihood of funding from State bonds or private foundations in the near future. In addition, some agencies felt that the important habitat areas on Newport Banning Ranch should be preserved through the development entitlement process, and public funding should not be used for acquisition of the entire property (Resources Opportunity Group, LLC. 2009). The City's open space acquisition consultant re-contacted State

⁵ Acquisition of the property does not include acquisition of the underlying mineral rights, which are owned by a third party.

funding agencies in July 2010, after some Proposition 84 funds had been released. While some of those funds were technically “available” and agency staff had been told they may consider projects again, the practical reality was that any money available was only for projects that have been on line for two to three years, with appraisals and purchase negotiations completed. As in 2009, the conclusion was that there would not be enough money for an acquisition like Newport Banning Ranch for open space purposes (Wood 2009).

To date, funds for the acquisition of the site have not been available and a viable funding program has not been identified. The Renewed Measure M (also known as Measure M2) was passed in November 2006, to extend the half-cent sales tax for transportation projects from April 2011 through 2041. A component of Measure M2 was the allocation of funds for environmental mitigation. The Newport Banning Ranch property was one of the initial 14 properties that were recommended by the OCTA Environmental Oversight Committee (EOC) to be considered for acquisition as part of the Environmental Mitigation Program (EMP) developed for the Measure M2. Acquisition properties identified for the EMP were ranked according to their biological values and those with higher habitat values and willing sellers were subject to appraisals and further negotiations. At the time, Newport Banning Ranch, LLC indicated it would not provide a letter indicating intent to sell because the property was in the entitlement process and a Draft Environmental Impact Report was expected to be issued in 2010 (Ward 2010). Newport Banning Ranch, LLC indicated that, given the circumstances pertaining to the Newport Banning Ranch property—including the very high City and Owner land valuations—the admission to the OCTA Vision 2020 Committee by the EOC that their intention was not to use “highest and best use” as the standard for appraisal/valuation, as well as concerns related to oil operations clean-up liabilities, a “willing seller” letter could not be provided.

While EIRs are to focus on environmental impacts, rather than economic considerations, the financial feasibility of implementing an Alternative is a reasonable consideration under CEQA. If the resources are not available, the decision makers may be determined that this is not a feasible Alternative regardless of the potential environmental or other public benefits.

Additionally, this Alternative does not meet the Project objectives as effectively as the proposed Project. Specifically, this Alternative would not meet the following Project objectives:

- Development of a residential village of up to 1,375 residential units, offering a variety of housing types in a range of housing prices, including provision of affordable housing to help meet the City’s Regional Housing Needs Assessment (RHNA) (Objective 3).
- Development of up to 75 overnight accommodations in a small resort inn including ancillary facilities and services such as a spa, meeting rooms, shops, bars, and restaurants that would be open to the public (Objective 4).
- Development of up to 75,000 square feet of retail commercial uses oriented to serve the needs of local residents and visitors utilizing the resort inn and the coastal recreational opportunities provided as part of the Project (Objective 5).
- Development of a land use plan that (1) provides a comprehensive design for the community that creates cohesive neighborhoods promoting a sense of identity with a simple and understandable pattern of streets, a system of pedestrian walkways and bikeways that connect residential neighborhoods, commercial uses, parks, open space and resort uses; (2) reduces overall vehicle miles travelled; (3) integrates landscaping that is compatible with the surrounding open space/habitat areas and that enhances the pedestrian experience within residential areas; and (4) applies architectural design

criteria to orient residential buildings to the streets and walkways in a manner that enhances the streetscape scene (Objective 6).

- Implement a Water Quality Management Program within the Project site that will utilize existing natural treatment systems and that will improve the quality of urban runoff from off-site and on-site sources prior to discharging into the Santa Ana River and the Semeniuk Slough (Objective 14).

In addition, the following objectives would only be partially met with Alternative B, assuming that adequate funding is available:

- Provide enhanced public access in the Coastal Zone through a system of pedestrian walkways, multi-use trails, and on-street bikeways designed to encourage walking and biking as an alternative to the use of automobiles by providing connectivity among residential, commercial, park, open space, and resort uses within the Project site and to existing adjacent open space, hiking and biking trails, the beach, and the Pacific Ocean (Objective 8).
- Provide for the restoration and permanent preservation of habitat areas through implementation of a Habitat Restoration Plan (HRP) for the habitat conservation, restoration, and mitigation areas (“Habitat Areas”) as depicted on the Master Development Plan (Objective 10).
- Provide for long-term preservation and management of the Habitat Areas through the establishment of a conservation easement or deed restriction and the creation of an endowment or other funding program (Objective 11).
- Improve the existing arroyo drainage courses located within the Project site to provide for higher quality habitat conditions than exist prior to the time of Project implementation (Objective 13).
- Implement fire protection management solutions designed to protect development areas from fire hazards, to preserve sensitive habitat areas, and to create fire-resistant habitat restoration areas within currently denuded, invasive-species laden, and/or otherwise degraded areas (Objective 15).

Though this Alternative would not meet or would not effectively meet more than half the Project objectives, the General Plan identifies that the open space land use is the primary land use for the site with the residential village serving as an alternate, if acquisition for open space is not feasible. Therefore, Alternative B is considered to be potentially feasible.

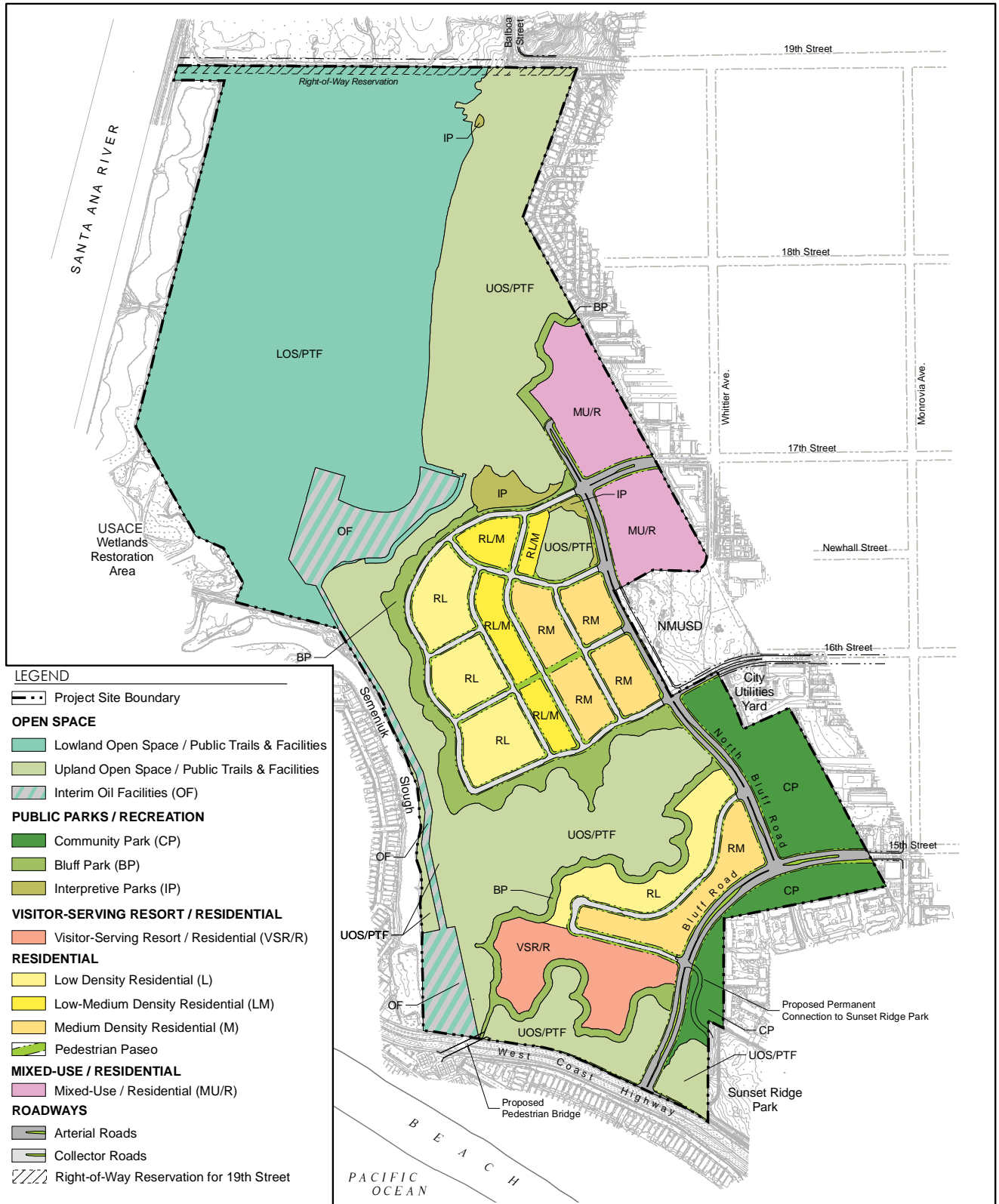
7.5.3 ALTERNATIVE C: PROPOSED PROJECT WITHOUT NORTH BLUFF ROAD EXTENSION TO 19TH STREET

Description of the Alternative

Alternative C was developed to provide an incremental reduction in the impacts associated with the extension of North Bluff Road, north of 17th Street. All other components of the proposed Project would also be implemented by Alternative C. By removing the extension of this segment of the roadway, the open space area would not be bisected as a result of this Alternative. Alternative C does not assume the deletion of North Bluff Road between 17th Street and 19th Street from the City's General Plan Circulation Element Master Plan of Streets and Highways or the Orange County MPAH. Therefore, although the road would not be constructed as part of this Alternative, it does not preclude the construction of this roadway segment in the future. Should the road be constructed in the future, the impacts that are avoided at this time would be realized. It should be noted that implementation of the segment of roadway between 17th and 19th Streets would be a separate project and would require separate approvals. However, a General Plan Circulation Amendment and MPAH would still be required for Alternative C to delete the segment of 15th Street west of Bluff Road, which would provide a second arterial through the Project site connecting to West Coast Highway.

Alternative C would allow for the development of the 401-acre site with residential, commercial, resort inn, recreational and open space uses without the construction of North Bluff Road between 17th Street and 19th Street. Other than the extension of North Bluff Road, all components of Alternative C are the same as the proposed Project. Other Project features, such as the parks, trails, oil remediation, resort inn, and mixed use areas are the same as the proposed Project. The PDFs, SCs, and MMs identified for the proposed Project would also be applicable to this Alternative. Alternative C is the same not only with regards to land uses and amenities, but also includes the same fuel modification and other features such as drainage improvements. The Mitigation Program (PDFs, SCs, and MMs) outlined for the proposed Project would also apply to Alternative C, with the exception of providing the northern extension of North Bluff Road.

Proposed land uses (including proposed land use designations) are depicted on Exhibit 7-2, Alternative C: Land Use Plan. Table 7-6, Alternative C Statistical Summary, shows 1,375 du, 75,000 sf of commercial uses, and a 75-room resort inn. Approximately 51.9 acres are proposed for active and passive park uses. Approximately 16.5 acres would be used for the consolidation of oil facility operations in 2 locations. Once oil operations are completed, this acreage would be retained in open space use. Alternative C includes a vehicular and a non-vehicular circulation system similar to that included in the proposed Project, with the exception of North Bluff Road north of 17th Street.



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Source: FORMA 2011

Alternative C: Proposed Land Use Plan with North Bluff Road to 17th Street

Exhibit 7-2

Newport Banning Ranch EIR



Bonterra
CONSULTING

**TABLE 7-6
ALTERNATIVE C STATISTICAL SUMMARY**

Land Use District		Gross Acres ^a	Planned Dwelling Unit	Maximum Permitted Commercial sf	Maximum Resort Inn Room
Open Space					
LOS/PTF	Lowland Open Space/Public Trails and Facilities ^b	130.6	–	–	–
UOS/PTF	Upland Open Space/Public Trails and Facilities ^b	104.9	–	–	–
OF	Interim Oil Facilities ^c	16.5	–	–	–
<i>Subtotal Open Space</i>		<i>252.0</i>	–	–	–
Public Parks/Recreation					
CP	Community Park	26.8	–	–	–
BP	Bluff Park ^d	21.4	–	–	–
IP	Interpretive Parks ^d	3.7	–	–	–
<i>Subtotal Public Parks/Recreation</i>		<i>51.9</i>	–	–	–
Visitor-Serving Resort/Residential^e					
VSR/R	Visitor-Serving Resort/Residential	11.3	87	–	75
<i>Subtotal Visitor-Serving Resort/Residential</i>		<i>11.3</i>	<i>87</i>	–	<i>75</i>
Residential^e					
L	Low Density Residential (up to 8 du/ac)	26.1	167	0	–
L/M	Low-Medium Density Residential (up to 16 du/ac)	11.8	85	0	–
M	Medium Density Residential (up to 24 du/ac)	27.3	306	0	–
<i>Subtotal Residential</i>		<i>65.2</i>	<i>558</i>	<i>0</i>	–
Mixed-Use/Residential^e					
MU/R	Mixed-Use/Residential (up to 40 du/ac)	20.7	730	75,000	–
<i>Subtotal Mixed-Use/Residential</i>		<i>20.7</i>	<i>730</i>	<i>75,000</i>	–
Total Project		401.1	1,375	75,000	75

sf: square footage;du/ac: dwelling units per acre

^a Gross acres are measured to centerlines of all public roads where such roads are shown on the plan. As a result, there are minor acreage differences with Alternative C compared to the proposed Project. Both scenarios are proposing the same land uses; however, the deletion of the extension of North Bluff Road results in slightly less acreage in the open space and mixed-use residential categories and slightly greater acreage in the Bluff Park category. Gross acres are computed using geographic information system (GIS) technology with accuracy to 10 decimal places. Acres are shown in this table to one decimal place.

^b The Right-of-Way Reservation for the 19th Street Extension contains approximately 3.2 acres.

^c The Interim Oil Facilities (Open Space) District includes: (1) the existing oil operations site near West Coast Highway; (2) the oil consolidation site near the middle of the Lowland; and (3) an oil access road (non-exclusive easement) connecting the two working sites.

^d Gross acres for the Bluff Park District and Interpretive Parks District may include fuel management zones, interpretive trails and facilities, and landscape focal points and greens.

^e Gross acres for Residential Districts, the Visitor-Serving Resort/Residential District, and the Mixed-Use/Residential District may include fuel management zones, privately owned and maintained parks and recreation facilities, and landscape focal points and greens.

Source: FORMA 2011.

This Alternative would require the same permits and approvals as required for the proposed Project. In summary, Alternative C would require the approvals listed below.

City of Newport Beach

As with the proposed Project, the following discretionary actions by the City would be required:

- General Plan Sphere of Influence Map and Circulation Element Amendment
- Code Amendment
- Pre-Annexation Zone Change
- Newport Banning Ranch Planned Community Zoning
- Newport Banning Ranch Master Development Plan
- Tentative Tract Map (TTM) No. 17308
- Affordable Housing Implementation Plan (AHIP)
- Pre-Annexation and Development Agreement
- Traffic Phasing Ordinance Approval

Based on more detailed design, the following approvals would be required prior to implementation of Alternative C:

- Tentative and Final Tract Maps to further subdivide lots approved as part of the approval of TTM 17308;
- Site Development Review Permits;
- Use Permits;
- Model Home Permits;
- Grading Permits;
- Street Improvement and Pedestrian and Bicycle Bridge Plans;
- Storm Drainage, Sewer, Water, and Dry Utility Plans;
- Landscaping and Park Plans;
- Building Permits;
- Public Facilities Financing and Bond Issuance;
- Encroachment Permits;
- Acquisition of rights of entry easements and right-of-way for off-site Project improvements, as necessary;
- Construction of Public Facilities.

Federal

- **USACE:** Section 404 permit for impacts to areas determined to be “Waters of the U.S.”.
- **U.S. Fish and Wildlife Service:** Section 7 Consultation for listed species.

State

- **Regional Water Quality Control Board:** Water Quality Certification under Section 401 of the Federal Clean Water Act; approval related to oil well/facility abandonment and site remediation.
- **California Department of Fish and Game:** Section 1600 Streambed Alteration Agreement.

- **California Coastal Commission:** Master Coastal Development Permit, including approval of the Newport Banning Ranch Master Development Plan.
- **California Department of Transportation (Caltrans):** Activities located within California Department of Transportation (Caltrans) right-of-way would require an Encroachment Permit. An Encroachment Permit would be required for widening and improving West Coast Highway, modifications to the reinforced concrete box (RCB) culvert in West Coast Highway, and for constructing a pedestrian and bicycle bridge over West Coast Highway. All activities must be in compliance with Caltrans' Statewide National Pollutant Discharge Elimination System (NPDES) Permit.
- **California Department of Conservation, Division of Oil, Gas and Geothermal Resources:** Site remediation activities.

Regional and Special Districts

- **Local Agency Formation Commission:** Annexation approval.
- **South Coast Air Quality Management District:** SCAQMD permits for the oilfield soil remediation.

County

- **Orange County Transportation Authority:** Amendment to the Orange County MPAH.
- **Orange County Health Care Agency:** Approval related to oil well/facility abandonment and site remediation.

Comparative Analysis of Environmental Impacts

Land Use and Related Planning Programs

Alternative C assumes the same land uses and same development plan as the proposed Project without the construction of North Bluff Road between 17th Street and 19th Street. As described in Section 4.1.7 of Section 4.1, Land Use and Related Planning Programs, the Project site is generally bound by established development to the north, south, and east. The Santa Ana River generally borders the Project site to the west with single-family residences west of the Semeniuk Slough. Although the Project site is surrounded by established communities of residential development, the Project site itself is an active oilfield and there are no public uses or public access to the site. Therefore, as with the proposed Project, Alternative C would not physically divide an established community (Threshold 4.1-1). However, as with the proposed Project, some homes in the Newport Crest development would be affected by vehicular noise from Bluff Road and night lighting associated with the Community Park. The noise impacts would be potential land use compatibility impacts that would remain significant if the residents of Newport Crest elect not to have the mitigation measures for vehicular noise impacts implemented. In addition, as with the proposed Project, there would be a potential long-range noise impacts for residents on 17th Street west of Monrovia Avenue if the City of Costa Mesa does not implement the recommended measure of resurfacing the street with rubberized asphalt.

Threshold 4.1-2 pertains to consistency with any applicable plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. As with the proposed Project, Alternative C would be consistent with applicable the land use policies. For this threshold, both Alternative C and the proposed Project would have no impacts.

Aesthetics and Visual Resources

Alternative C includes the development of the same land uses as those under the proposed Project with the exception of North Bluff Road between 17th Street and 19th Street. The proposed Project would not substantially degrade the visual character or quality of the site. Alternative C would result in the same site plan for the southwest portion of the Project site and would not result in an adverse effect on a scenic vista because the City does not have any designated scenic vistas and West Coast Highway is not a State- or locally designated scenic highway (Threshold 4.2-1).

As discussed in Section 4.2, Aesthetics and Visual Resources, the views of the Project site from off-site locales (such as from public streets, Talbert Regional Park, and surrounding development) would generally be the same with Alternative C as with the proposed Project. One exception would be where the proposed Project would have North Bluff Road intersect 19th Street. Exhibit 4.2-7, View 6 North Bluff Road at 19th Street, illustrates the Project site from 19th Street at Balboa Street (public streets). As shown in the existing view, aboveground utility poles and lines can be seen along 19th Street; these transmission lines extend west onto the Project site. A guardrail is visible along the south side of 19th Street. The Project site is visible south of 19th Street; Talbert Regional Park is located west of the terminus of 19th Street (on the right side of the photograph). In this view, the varying topography and on-site vegetation is visible. Under Alternative C, North Bluff Road would not be extended from 17th Street to 19th Street. Under Alternative C, the existing guardrail would not be removed and would remain visible. The existing utility poles currently on the Project site would be relocated and/or placed underground.

The overall grading of the entire Project site is slightly reduced compared to the proposed Project because with Alternative C there would be no grading to accommodate the northern extension of North Bluff Road. The remainder of the Project site would be developed with the same land uses and site plan as the proposed Project. Section 4.2 of this EIR details the aesthetic impacts resulting from the proposed Project and determines that there would be less than significant impacts associated with degrading the visual character. Similar to the proposed Project, development under Alternative C would alter existing views of the Project site; however, due to extensive site planning, Alternative C would not degrade the visual character or result in a significant aesthetic impact (Threshold 4.2-2).

Because Alternative C would be developed with the same land uses, Alternative C would introduce new sources of light on the Project site similar to the proposed Project, resulting in nighttime lighting into a currently unlit area. This increased nighttime lighting on the Project site is considered a significant and unavoidable impact under the proposed Project and Alternative C (Threshold 4.2-3). As previously indicated for the proposed Project, implementation of the Mitigation Program identified in Section 4.2.8 would reduce potential nighttime lighting effects; however, the impact would remain significant and unavoidable. The conclusions for the proposed Project and Alternative C with respect to night lighting are consistent with the General Plan Findings of Fact and Statement of Overriding Considerations.

As with the proposed Project, Alternative C would be consistent with the intent of the aesthetic resources goals and policies of the *City of Newport Beach General Plan* and the California Coastal Act (Threshold 4.2-4).

Geology and Soils

Alternative C assumes the same land uses and same development plan as the proposed Project without the construction of North Bluff Road between 17th Street and 19th Street. The proposed Project would require total excavation of approximately 2,500,000 cubic yards (cy) including approximately 900,000 cy of cut and fill and 1,455,000 cy of cut and fill corrective grading. Alternative C would require total excavation of approximately 2,400,000 cy, including 850,000 cy of cut and fill and 1,405,000 cy of cut and fill corrective grading. Overall, Alternative C would require less grading compared to the proposed Project.

As indicated in Section 4.3, Geology and Soils, the Project site is located in a seismically active area with faults within the proposed development site that could not be proven to be inactive (Threshold 4.3-1). Habitable structures near these faults are subject to fault setback zones and seismic design parameters that would appropriately address seismic building standards. As with the proposed Project, Alternative C would result in the potential for impacts associated with surface fault rupture and seismic shaking (Threshold 4.3-2). Implementation of the Mitigation Program in Section 4.3.9 would reduce potential impacts to less than significant. Impacts associated with these thresholds would be similar for both the proposed Project and Alternative C.

As indicated in Section 4.3, Geology and Soils, two fault segments on the Project site have not been confirmed as inactive, and development setbacks have been recommended. The fault setback zones would reduce the risk of surface fault rupture. As with the proposed Project, Alternative C would incorporate strengthened building foundations and structural design which would accommodate strong seismic shaking on the Project site. Habitable structures would be restricted to the Upland area, avoiding soils that may liquefy or undergo lateral spreading and, where necessary, corrective grading would ensure all structures are placed on competent foundation materials. Furthermore, this Alternative would not result in impacts from seismic-related ground failure, liquefaction, lateral spreading, soil collapse, or landslides (Thresholds 4.3-3 and 4.3-6). Implementation of the Mitigation Program in Section 4.3.9 would reduce potential impacts to less than significant. Impacts associated with these thresholds would be similar for both the proposed Project and Alternative C.

As with the proposed Project, Alternative C would be subject to some existing on-site potential for landslides under dynamic seismic conditions. Consistency with the California Building Code (CBC), City building code requirements, and General Plan policies along with the incorporation of bluff setback zones (PDF 4.3-1) would ensure that impacts associated with on- and off-site landslides would be less than significant (Threshold 4.3-4). Impacts associated with this threshold would be similar for both the proposed Project and Alternative C.

As with the proposed Project, grading activities associated with Alternative C would increase the potential for soil erosion and loss of topsoil (Threshold 4.3-5). With the incorporation of construction BMPs as described in Section 4.4, Hydrology and Water Quality, impacts on soil erosion and loss of topsoil would be less than significant. Post-construction, soil erosion and the loss of topsoil would be minimized through the use of engineered grading, surface drainage improvements, and landscaping (e.g., PDFs 4.3-2 and 4.3-3). Impacts associated with the proposed Project and Alternative C would be similar and less than significant.

On-site soils have a low to medium expansion potential. As with the proposed Project, incorporation of SCs 4.3-1 through 4.3-3 and MMs 4.3-1 through 4.3-3, would reduce impacts from this Alternative associated with expansive soils to a less than significant level

(Threshold 4.3-7). Impacts associated with this threshold would be similar for both the proposed Project and Alternative C.

Alternative C and the proposed Project would be consistent with the intent of the soils and geology-related goals and policies of the *City of Newport Beach General Plan* and the California Coastal Act (Threshold 4.3-8).

Hydrology and Water Quality

Alternative C would result in an increase in impervious surfaces and would increase the amount of runoff and the concentration of pollutants in storm water runoff as compared to existing conditions, but would be less than the proposed project (Thresholds 4.4-1, 4.4-6, 4.4-11, 4.4-12, and 4.4-13). Implementation of the Mitigation Program in Section 4.4.7 of the EIR would ensure that these impacts would be reduced to a less than significant level. When compared to the proposed Project, Alternative C would result in similar but incrementally less impacts. As with the proposed Project, these impacts through mitigation would be less than significant.

The proposed Project would result in an increase in impervious surface and would reduce the potential for groundwater percolation (Threshold 4.4-2); implementation of treatment-control BMPs and low-impact development (LID) features would ensure that impacts would be less than significant. Alternative C would have less impervious surface than the proposed Project; therefore, potential impacts to groundwater would be incrementally less than the proposed Project. This impact would be less than significant.

This Alternative would involve changes to existing drainage patterns and would cause increases in erosion on the Project site and in the surrounding areas (Thresholds 4.4.3 and 4.4-15). Implementation of the Mitigation Program in Section 4.4.7 of the EIR would ensure that these impacts would be reduced to a less than significant level. When these impacts are compared to the proposed Project, Alternative C would result in similar impacts that would be less than significant.

Alternative C would result in increased impervious surfaces and in peak flow runoff and runoff volumes from the site (Thresholds 4.4-4 and 4.4-14) and would affect the capacity of existing and planned storm water drainage systems (Threshold 4.4-5). When compared to the proposed Project, these impacts would be similar, but incrementally less. These impacts would be less than significant.

As with the proposed Project, housing associated with Alternative C would be located on the Upland at elevations well outside the 100-year floodplain. There would be no impacts to or from the 100-year floodplain for both the proposed Project and Alternative C (Thresholds 4.4-7 and 4.4-8).

The Project site is located at the lower end of the watershed and is not located within any dam inundation areas. In addition, development is proposed for the site's Upland area which is located above the Santa Ana River's 100-year floodplain. As with the proposed Project, housing associated with Alternative C would be located on the Upland and people and/or structures would not be exposed to significant risk associated with the failure of a levee or dam (Threshold 4.4-9). Potential impacts associated with Threshold 4.4-9 would be less than significant for both the proposed Project and Alternative C.

There are no permanent standing water bodies in the Upland area and inundation by tsunami is not likely because of Project site elevations and the City's existing Emergency Management

Plan. Therefore, as with the proposed Project, inundation by seiche, tsunami, or mudflow is not likely for this Alternative (Threshold 4.4-10).

Alternative C would not conflict with applicable land use policies (Threshold 4.4-16). As with the proposed Project, this Alternative would be consistent with the Harbor and Bay Element, Natural Resources Element, and Safety Element goals and policies, which are outlined in Table 4.4-25, City of Newport Beach General Plan Consistency Evaluation and the relevant California Coastal Act policies which are outlined in Table 4.4-26, California Coastal Act Consistency Analysis.

Hazards and Hazardous Materials

As discussed in Section 4.5, Hazards and Hazardous Materials, with implementation of the identified Mitigation Program, potentially significant impacts related to the historical and continuing oil operations on the Project site and the potential presence of ACMs and LBP in some structures would be reduced to a level considered less than significant. Alternative C would result in the same land uses and same development plan as the proposed Project without the construction of North Bluff Road between 17th Street and 19th Street. The presence or absence of this portion of North Bluff Road is inconsequential to the need for, or implementation of, the final RAP identified in the Mitigation Program. Therefore, with implementation of the Mitigation Program, like the proposed Project, this Alternative would result in less than significant impacts related to Thresholds 4.5-1 and 4.5-2, which pertain to the creation of hazards associated with the transport, use, disposal, and/or emissions of hazardous materials and location on an identified hazardous materials site.

Both the construction and operational characteristics of Alternative C are the same as the proposed Project. The long-term operation of the development would not emit hazardous emissions within ¼ mile of a school; however, the remediation activities may establish off-site haul routes on streets that pass existing schools. Implementation of SCs would provide for impacts to be considered less than significant. This is consistent with the finding for the proposed Project (Threshold 4.5-3).

The Project site is not identified on the Cortese List, which is compiled pursuant to Section 65962.5 of the *California Government Code*. Therefore, there would be no impact associated with Threshold 4.5-4.

Threshold 4.5-5 pertains to consistency with any applicable plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Alternative C would not conflict with applicable land use, harbor and bay, natural resource, or safety policies because it would provide for the consolidation of oilfield activities and remediation of the site, which is same as the proposed Project. The policies, which were outlined in Table 4.5-5, City of Newport Beach General Plan Consistency Evaluation, call for (1) the prohibition of new oil and gas extraction activities; (2) the consolidation and/or relocation of existing oil operations; (3) limiting hazards associated with oil operations; and (4) the assessment and, if necessary, remediation of soil and groundwater contamination. This Alternative would be consistent with provisions of the General Plan and other applicable policies. For this threshold, this Alternative would have a similar impact to the proposed Project, and would remain less than significant.

Biological Resources

Alternative C would reduce the impacts to biological resources compared to the proposed Project. There would be a reduced substantial adverse effect, either directly or through habitat modifications, on species identified as a candidate, sensitive, or special status species in local

or regional plans, policies, or regulations, or by the CDFG or USFWS (Threshold 4.6-1). Alternative C's impact and the difference between Alternative C and the proposed Project are summarized below.

- Alternative C and the proposed Project have identical impacts to special status plant species. Approximately 500 of the tarplant individuals occur within the permanent impact area, and approximately 4,590 occur within the temporary impact (oil remediation) area. These impacts would be considered significant; however, with implementation of identified PDFs and MMs, potentially significant impacts to these resources from Alternative C would be reduced to a level considered less than significant.
- As with the proposed Project, potential impacts from Alternative C on California Native Plant Society (CNPS) List 4 species are not expected to have a substantial adverse effect on these species; therefore, the impact would be considered less than significant.
- Alternative C and the proposed Project have identical impacts to grassland depression features and the San Diego fairy shrimp. Alternative C and the proposed Project would both result in substantial adverse effects on the pool areas supporting San Diego fairy shrimp; however, with implementation of identified PDFs and MMs, potentially significant impacts to these resources from Alternative C would be reduced to a level considered less than significant.
- As with the proposed Project, there would be no significant impact to any fish, amphibian, or reptile species from implementation of Alternative C.
- Neither proposed Project nor Alternative C have any significant impacts on the following special status bird species: American white pelican, California brown pelican, double-crested cormorant, black skimmer, California least tern, white-faced ibis, California gull, gull-billed tern, fulvous whistling duck, long-eared owl, and California black rail. Therefore, mitigation for these species would not be required for either Alternative C or the proposed Project.
- Alternative C would result in similar impacts as those identified by the proposed Project which include potentially significant impacts for the loss of suitable foraging and/or nesting habitat for the light-footed clapper rail, western snowy plover, Belding's savannah sparrow, tricolored blackbird, least bittern, Clark's marsh wren, long-billed curlew, and large-billed savannah sparrow. With implementation of identified PDFs and MMs, potentially significant impacts to these resources from Alternative C would be reduced to a level considered less than significant.
- As with the proposed Project, there would be no significant impact to the western yellow-billed cuckoo, Vaux's swift, black swift, purple martin, bank swallow, loggerhead shrike, California horned lark, Southern California rufous-crowned sparrow, grasshopper sparrow, Bell's sage sparrow, southwestern willow flycatcher, yellow warbler, yellow-breasted chat, golden eagle, Swainson's hawk, or bald eagle from implementation of Alternative C. Therefore, no mitigation would be required for either the proposed Project or Alternative C related to impacts to these sensitive bird species.

**TABLE 7-7
 VEGETATION TYPES ON THE PROJECT SITE – ALTERNATIVE C IMPACTS**

Vegetation Type	Existing (Acres)	Permanent Impacts (Acres)	Temporary Impacts (Acres)	Temporary Impacts: Pipe Removal (Acres)	Total Temporary Impacts (Acres)	Total Impacts (Acres)	Area Not Affected (Acreage)
Coastal Sage Scrub	37.63	7.66	0.44	1.17	1.61	9.27	28.36
Southern Coastal Bluff Scrub	9.21	3.02	0.02	0.04	0.06	3.08	6.13
California Sagebrush Scrub	0.29	0.29	0.00	0.00	0.00	0.29	0.00
Encelia Scrub	15.73	3.43	0.20	0.68	0.88	4.31	11.42
Coyote Brush Scrub	0.33	0.04	0.01	0.00	0.01	0.05	0.28
Coyote Brush Scrub/Mule Fat Scrub	0.06	0.06	0.00	0.00	0.00	0.06	0.00
Goldenbush Scrub	0.87	0.01	0.12	0.01	0.13	0.14	0.73
Southern Cactus Scrub	8.91	0.72	0.03	0.41	0.44	1.16	7.75
Southern Cactus Scrub/Encelia Scrub	2.17	0.03	0.06	0.03	0.09	0.12	2.05
Saltbush Scrub	0.06	0.06	0.00	0.00	0.00	0.06	0.00
Disturbed Coastal Sage Scrub	20.64	9.20	1.10	0.65	1.75	10.95	9.69
Disturbed Southern Coastal Bluff Scrub	5.66	1.43	0.68	0.39	1.07	2.50	3.16
Disturbed Sage Scrub	0.30	0.00	0.00	0.00	0.00	0.00	0.30
Disturbed Encelia Scrub/Mule Fat Scrub	0.49	0.04	0.03	0.01	0.04	0.08	0.41
Disturbed Encelia Scrub	4.33	2.76	0.06	0.02	0.08	2.84	1.49
Disturbed Goldenbush Scrub	1.19	0.00	0.07	0.12	0.19	0.19	1.00
Disturbed Goldenbush Scrub/Mule Fat Scrub/ Salt Marsh	1.06	0.01	0.21	0.00	0.21	0.22	0.84
Disturbed Southern Cactus Scrub	1.04	1.00	0.00	0.00	0.00	1.00	0.04
Disturbed Southern Cactus Scrub/Encelia Scrub	0.78	0.36	0.00	0.00	0.00	0.36	0.42
Ruderal/Disturbed Encelia Scrub	0.80	0.80	0.00	0.00	0.00	0.80	0.00
Ruderal/Disturbed Encelia Scrub/Disturbed Mule Fat Scrub	2.74	2.74	0.00	0.00	0.00	2.74	0.00
Ornamental/Disturbed Southern Coastal Bluff Scrub	2.25	0.06	0.05	0.11	0.16	0.22	2.03

TABLE 7-7 (Continued)
VEGETATION TYPES ON THE PROJECT SITE – ALTERNATIVE C IMPACTS

Vegetation Type	Existing (Acres)	Permanent Impacts (Acres)	Temporary Impacts (Acres)	Temporary Impacts: Pipe Removal (Acres)	Total Temporary Impacts (Acres)	Total Impacts (Acres)	Area Not Affected (Acreage)
Grassland and Ruderal	120.40	95.76	2.16	0.75	2.91	98.67	21.73
Non-Native Grassland	85.76	78.71	0.36	0.14	0.50	79.21	6.55
Non-Native Grassland/Ruderal	6.51	6.07	0.44	0.00	0.44	6.51	0.00
Ruderal	28.13	10.98	1.36	0.61	1.97	12.95	15.18
Grassland Depression Features	0.40	0.07	0.02	0.04	0.06	0.13	0.27
Vernal Pool	0.33	0.00	0.02	0.04	0.06	0.06	0.27
Ephemeral Pool	0.07	0.07	0.00	0.00	0.00	0.07	0.00
Marshes and Mudflats	31.45	0.10	0.82	1.60	2.42	2.52	28.93
Freshwater Marsh	0.50	0.00	0.00	0.00	0.00	0.00	0.50
Alkali Meadow	20.39	0.07	0.36	1.14	1.50	1.57	18.82
Disturbed Alkali Meadow	2.42	0.00	0.06	0.13	0.19	0.19	2.23
Salt Marsh	6.01	0.03	0.29	0.32	0.61	0.64	5.37
Disturbed Salt Marsh	0.26	0.00	0.03	0.00	0.03	0.03	0.23
Mudflat	0.43	0.00	0.00	0.00	0.00	0.00	0.43
Open Water	1.44	0.00	0.08	0.01	0.09	0.09	1.35
Riparian Scrub/Forest	21.71	1.62	0.25	0.55	0.80	2.42	19.29
Mule Fat Scrub	3.32	0.20	0.10	0.11	0.21	0.41	2.91
Willow Scrub	1.14	0.08	0.01	0.10	0.11	0.19	0.95
Willow Riparian Forest	17.25	1.34	0.14	0.34	0.48	1.82	15.43
Disturbed Riparian Scrub/Forest	38.87	4.64	2.98	2.33	5.31	9.95	28.92
Disturbed Mule Fat Scrub	28.87	4.26	2.55	1.56	4.11	8.37	20.50
Disturbed Mule Fat Scrub/Ruderal	0.88	0.00	0.10	0.09	0.19	0.19	0.69
Disturbed Mule Fat Scrub/Goldenbush Scrub	2.03	0.35	0.21	0.10	0.31	0.66	1.37
Disturbed Willow Scrub	1.03	0.03	0.00	0.08	0.08	0.11	0.92
Disturbed Willow Riparian Forest	6.06	0.00	0.12	0.50	0.62	0.62	5.44

TABLE 7-7 (Continued)
VEGETATION TYPES ON THE PROJECT SITE – ALTERNATIVE C IMPACTS

Vegetation Type	Existing (Acres)	Permanent Impacts (Acres)	Temporary Impacts (Acres)	Temporary Impacts: Pipe Removal (Acres)	Total Temporary Impacts (Acres)	Total Impacts (Acres)	Area Not Affected (Acreage)
Other Areas	133.15	78.69	14.81	2.16	16.97	95.66	37.49
Giant Reed	0.39	0.00	0.00	0.02	0.02	0.02	0.37
Cliff	0.10	0.03	0.00	0.02	0.02	0.05	0.05
Ornamental	23.05	14.41	0.30	0.31	0.61	15.02	8.03
Disturbed	85.59	46.51	13.97	1.42	15.39	61.90	23.69
Disturbed/Developed	24.02	17.74	0.54	0.39	0.93	18.67	5.35
Total	404.25	197.74	22.58	9.25	31.83	229.57	174.68

- A total of 17 territories (16 pairs and 1 solitary male) of the federally listed Threatened coastal California gnatcatcher were observed during 2009 focused surveys. Alternative C would impact approximately 20.22 acres of coastal sage scrub vegetation types that provide potential habitat for this species (Table 7-7). This is approximately 2.89 fewer coastal sage scrub acres than anticipated impacts from the proposed Project. Three of the territories identified would be impacted to a lesser extent by Alternative C than that of the proposed Project. Even with the reduction in impacts to coastal sage scrub and gnatcatcher habitat, these impact areas are still considered significant and require mitigation, as outlined for the proposed Project's PDFs and MMs. As with the proposed Project, with mitigation these impacts would be less than significant.
- Alternative C would result in similar impacts as those identified for the proposed Project, which include potentially significant impacts on the coastal cactus wren. Alternative C would impact 2.64 acres of habitat for this species, which is 0.28 acre less than the proposed Project (2.92 acres). Both the proposed Project and Alternative C would significantly impact this species. As discussed in Section 4.6, Biological Resources, with implementation of the identified PDFs and MMs, potentially significant impacts to the cactus wren and their habitat from Alternative C would be reduced to a level considered less than significant.
- Two least Bell's vireo territories (both solitary males) were observed during the 2009 focused surveys. Alternative C and the proposed Project would result in the loss of approximately 2.74 acres of potential riparian habitat for the least Bell's vireo. These impacts are considered significant; however, implementation of MMs and PDFs would reduce impacts on this species to less than significant levels.
- Although suitable foraging and nesting habitat is present on the Project site for the burrowing owl, it is only expected to winter on the Project site based on the results of focused surveys. Alternative C would result in the loss of approximately 98.67 acres of potential habitat for this species. This is 1.46 acres less than the proposed Project (100.13 acres). These impacts on occupied and potential habitat for this species would be considered significant. Implementation of MMs and PDFs would reduce impacts on this species to less than significant levels.
- Suitable foraging/perching habitat is present for a variety of raptor species (including Cooper's hawk, sharp-shinned hawk, ferruginous hawk, northern harrier, white-tailed kite, merlin, prairie falcon, American peregrine falcon, short-eared owl, and osprey) on the Project site. Alternative C would result in the loss of approximately 119.05 acres of habitat for these species. This is 5.78 acres less than the proposed Project (124.83 acres). This impact would be considered significant. However, implementation of MMs and PDFs would reduce impacts on these species to less than significant levels.
- Cooper's hawk, northern harrier, and white-tailed kite have the potential to nest on the Project site. The loss of an active nest of these species, or any common raptor species, by Alternative C or the proposed Project would be considered a violation of Sections 3503, 3503.5, and 3513 of the *California Fish and Game Code*. Therefore, the loss of any active raptor nest would be considered significant. Impacts on active raptor nests would be reduced to less than significant levels with implementation of MMs and PDFs.
- As with the proposed Project, there would be no significant impact to the Southern California saltmarsh shrew, south coast marsh vole, Mexican long-tongued bat, Townsend's big-eared bat, western mastiff bat, Pacific pocket mouse, San Diego desert woodrat, southern grasshopper mouse, or American badger from implementation of

Alternative C. Therefore, no mitigation would be required for either the proposed Project or Alternative C.

- Alternative C would impact approximately 133.96 acres of suitable or potentially suitable foraging and/or roosting habitat for the pallid bat, hoary bat, western yellow bat, pocketed free-tailed bat, and big free-tailed bat. This is approximately 4.87 acres less than impacts from the proposed Project (138.83 acres). This impact would be considered significant. However, implementation of MMs and PDFs would reduce impacts on these species to less than significant levels.
- Alternative C would have similar indirect impacts related to disturbance from construction (such as noise, dust, and urban pollutants) and long-term use of the Project site and its effect on the adjacent habitat areas as those anticipated for the proposed Project. Indirect impacts found to be potentially significant for both Alternative C and the proposed Project include (a) invasion of native areas by Project ornamental landscape species, (b) water quality impacts on biological resources, (c) night lighting, and (d) increased human disturbance. As discussed in Section 4.6, Biological Resources, with implementation of the identified PDFs and MMs, potentially significant indirect impacts from implementation of Alternative C would be reduced to a level considered less than significant.
- The proposed Project, with Bluff Road terminating at 19th Street, would result in significant future traffic noise impacts on sensitive biological resources (i.e., least Bell's vireo, coastal California gnatcatcher). Alternative C would significantly reduce vehicle traffic noise in the areas north of 17th Street, reducing this impact to a less than significant level. No mitigation would therefore be required for Alternative C for indirect noise impacts.

This Alternative would involve a substantial adverse effect on riparian habitat and other sensitive natural communities (Thresholds 4.6-2 and 4.6-3). The amount of impact to sensitive natural communities by Alternative C and the difference between Alternative C and the proposed Project is summarized below.

- Alternative C would impact approximately 13.95 acres of special status riparian habitat. This represents 0.49 acre less than the proposed Project (14.44 acres). Although Alternative C impacts to special status riparian habitat are less than the proposed Project, they are still considered significant. As discussed in Section 4.6, Biological Resources, with implementation of the identified PDFs and MMs, potentially significant impacts to special status riparian habitats from Alternative C would be reduced to a level considered less than significant.
- Alternative C would result in the loss of 11.71 acres of coastal sage scrub designated as special status. This is 2.47 acres less than the proposed Project (14.18 acres). Although Alternative C impacts to special status sage scrub habitat are less than the proposed Project, they are still considered significant. As discussed in Section 4.6, Biological Resources, with implementation of the identified PDFs and MMs, potentially significant impacts to special status sage scrub habitats from Alternative C would be reduced to a level considered less than significant.
- Alternative C would result in the loss of approximately 98.67 acres of grassland and ruderal vegetation. This is 1.46 acres less than the proposed Project (100.13 acres). Although these areas generally have low biological value, these areas may provide suitable foraging habitat for a variety of raptor species, including wintering burrowing owls. The loss of grassland function for foraging raptors is considered significant for

Alternative C. With implementation of identified PDFs and MMs, potentially significant impacts to these resources from Alternative C would be reduced to a level considered less than significant.

- Alternative C and the proposed Project have identical impacts to grassland depression features. Alternative C and the proposed Project would both result in 0.06 acre of temporary impacts and 0.07 acre of grassland depression features. These impacts would be considered significant; however, with implementation of identified PDFs and MMs, potentially significant impacts to these resources from Alternative C would be reduced to a level considered less than significant.
- Alternative C would impact 4.22 acres of “Waters of the U.S.” and USACE wetlands, 1.25 acres under the jurisdiction of the CDFG, and 8.49 acres under the jurisdiction of the Coastal Commission. By eliminating the northern portion of Bluff Road, Alternative C reduces impacts to these jurisdictional resources by the following amounts compared to the proposed Project: reduction of 0.03 acres of “Waters of the U.S.” and USACE wetlands; 0.67 acre under the jurisdiction of the CDFG; and 0.51 acre under the jurisdiction of the Coastal Commission. Although reduced from the proposed Project, these impacts are still considered significant. As with the proposed Project, implementation of identified PDFs and MMs would reduce these impacts to a level considered less than significant.

Because Alternative C would reduce the impacts to biological resources, the amount of acreage that would be restored in compliance with mitigation measures imposed on the Project as conditions of approvals and permits within the Lowland Open Space Preserve would be expected to be less than the proposed Project. Any acreage to be restored after fulfilling mitigation requirements and requiring restoration would be placed in a reserve area (mitigation bank) or similar mechanism and may be made available to third parties seeking off-site areas in which to fulfill their respective mitigation obligations. The area would be restored in accordance with the Habitat Restoration Plan. One area that is contemplated for inclusion in a mitigation bank is the land proposed for use for the consolidated oil operations. Upon cessation of oil production operations, these two Oil Consolidation sites would be remediated and could be available in a reserve area.

Because Alternative C assumes the same land uses and same development plan as the proposed Project, just without the construction of North Bluff Road between 17th Street and 19th Street, this Alternative would result in similar impacts to the movement of any native resident or migratory wildlife corridors and use of native wildlife nursery sites as compared to the proposed Project (Threshold 4.6-4).

Alternative C would permanently reduce the size of coastal open space (all vegetation types except ornamental disturbed and disturbed/developed) by approximately 133.98 acres. This would be approximately 4.87 less acres than the proposed Project. Although Alternative C would reduce the fragmentation on site by not extending North Bluff Road through to 19th Street, impacts resulting from habitat loss and reduced movement opportunities would still remain significant with Alternative C. However, as discussed in Section 4.6, Biological Resources, with implementation of the identified PDFs and MMs, these potentially significant impacts would be reduced to a level considered less than significant.

As with the proposed Project, this Alternative would also not conflict with any local policies or ordinances protecting biological resources or provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan (Threshold 4.6-5).

Population, Housing, and Employment

Alternative C assumes the same land uses and same development plan as the proposed Project without the construction of North Bluff Road between 17th Street and 19th Street. As a result, Alternative C would have the same residential population as the proposed Project, and would not induce substantial growth (Threshold 4.7-1). Similar to the proposed Project, this Alternative would create long-term employment opportunities and would help balance the employment demands associated with the City's population. With Alternative C, approximately 36 percent of the projected population growth and 25 percent of the projected employment growth in the City for the 25-year period between 2010 and 2035 would be accommodated on the Newport Banning Ranch site. As with the proposed Project, less than significant impacts would result with respect to consistency with population projections.

This Alternative would provide the same commitment to affordable housing as the proposed Project. The draft Newport Banning Ranch Affordable Housing Implementation Plan (AHIP) proposes the construction of a minimum of 50 percent of its required affordable housing obligation on the Project site. The remaining affordable housing obligation would be met through the payment of in-lieu fees, land dedication, or a combination thereof. Alternative C would implement the same program, thereby assisting the City in meeting the RHNA requirements. As with the proposed Project, Alternative C would be consistent with applicable plans and policies (Threshold 4.7-2). This Alternative would be consistent with the California Coastal Act provision pertaining to population, housing, and employment.

Recreation and Trails

Alternative C assumes the same land uses and same development plan as the proposed Project without construction of North Bluff Road between 17th Street and 19th Street. Alternative C would therefore increase the demand for park and recreational facilities similar to that of the proposed Project, and would provide the same parks and trails as the proposed Project. As with the proposed Project, the Community Park would be constructed by the Applicant as part of this Alternative; it would be offered for dedication to the City; and, upon acceptance, it would be maintained by the City. As with the proposed Project, less than significant impacts would result with respect to recreation (Thresholds 4.8-1, 4.8-2, and 4.8-3).

As identified in Tables 4.8-4 and 4.8-5, the proposed Project would not conflict with any goals or policies of the *City of Newport Beach General Plan* or the California Coastal Act related to recreational resources. Because Alternative C provides for park and recreational facilities similar to that of the proposed Project, it would be consistent with the intent of the applicable land use goals and policies of the City of Newport Beach General Plan (Threshold 4.8-4).

Transportation and Circulation

Alternative C assumes the same land uses and amount of development as the proposed Project. Because the only difference for this Alternative is the termination of North Bluff Road just north of 17th Street, the trip generation estimates and underlying methodology set forth for the proposed Project also apply to this Alternative. Both Alternative C and the proposed Project are estimated to generate 14,989 average daily trips (ADT) with 906 trips in the AM peak hour and 1,430 trips in the PM peak hour (see Section 4.9, Table 4.9-7). Vehicular trips that were assigned to the northern segments of North Bluff Road were reassigned to remaining available paths along 17th, 16th and 15th Streets, and West Coast Highway for Alternative C. In this scenario, Project-related peak hour traffic volumes are added to existing traffic volumes.

The following analysis addresses Thresholds 4.9-1 and 4.9-2.

Existing Conditions

Intersection Levels of Service: Within the traffic study area, all intersections are operating at an acceptable LOS (i.e., LOS D or better) except for the three Costa Mesa intersections listed below (intersections numbered as identified in Section 4.9, Transportation and Circulation).

City of Costa Mesa

- 26. Newport Boulevard at Victoria Street/22nd Street (AM: LOS E)
- 36. Newport Boulevard at Harbor Boulevard (PM: LOS E)
- 37. Newport Boulevard at 18th Street/Rochester Street (PM: LOS E)

CMP Intersection: The CMP intersection of Newport Boulevard at West Coast Highway is operating at LOS D in the AM peak hour and LOS B in the PM peak hour. As such, this intersection is operating at an acceptable level of service based on CMP criteria.

State Highway Intersections: This Traffic Impact Analysis assumes that a significant project impact occurs at a State Highway study intersection when the addition of Project-generated trips causes the study intersection's peak hour LOS to change from acceptable operations (LOS A, B, or C) to deficient operations (LOS D, E, or F). Where the intersection is currently operating at a deficient LOS, the existing level of service is to be maintained. The evaluation used the Highway Capacity Manual (HCM) methodology to calculate LOS at State intersections. All traffic study area intersections are currently operating at an acceptable LOS (LOS C or better) except for the following intersection in the City of Costa Mesa:

City of Costa Mesa

- 26. Newport Boulevard at Victoria Street/22nd Street, (AM: LOS D).

Existing Plus Alternative C Analysis

This is a hypothetical scenario in which a project would be fully implemented at the present time. This analysis, required by CEQA, isolates the potential impact of Alternative C from other projects and circulation system improvements, and assumes full development of Alternative C and full absorption of the Alternative's traffic on the existing highway system (i.e., adding all Alternative C-related trips to existing traffic volumes). The *Existing Plus Alternative C* scenario does not account for future population growth that is projected in the City and in adjacent jurisdictions within the traffic study area, with or without the Alternative. Further, it does not account for other future land use projects that would also be conditioned to provide for or contribute to needed traffic improvements to the traffic study area or other anticipated circulation improvements. Lastly, the circulation system is projected to change over time, with or without the Alternative. These circulation system changes include road and intersection improvements.

Intersection Levels of Service: Alternative C trips were added to existing traffic volumes at the traffic study area intersections. Table 7-8 identifies the peak hour ICU/delay values and the corresponding levels of service for the traffic study area intersections for the Existing Plus Alternative C scenario. With the elimination of the segment of North Bluff Road between 17th Street and 19th Street, some of the traffic would distribute differently, and some of the impact would shift from 19th Street to 17th Street.

As identified in the table, all but five intersections are forecasted to operate at an acceptable LOS. Three of these are City of Costa Mesa intersections (intersection 26, 36, and 37), which are currently (i.e., under Existing Conditions) operating at a deficient LOS. Three intersections (intersections 36, 37, and 43) are forecasted to be impacted by the proposed Project, whereas 4 intersections (intersections 36, 37, 42, and 43) would be impacted with Alternative C.

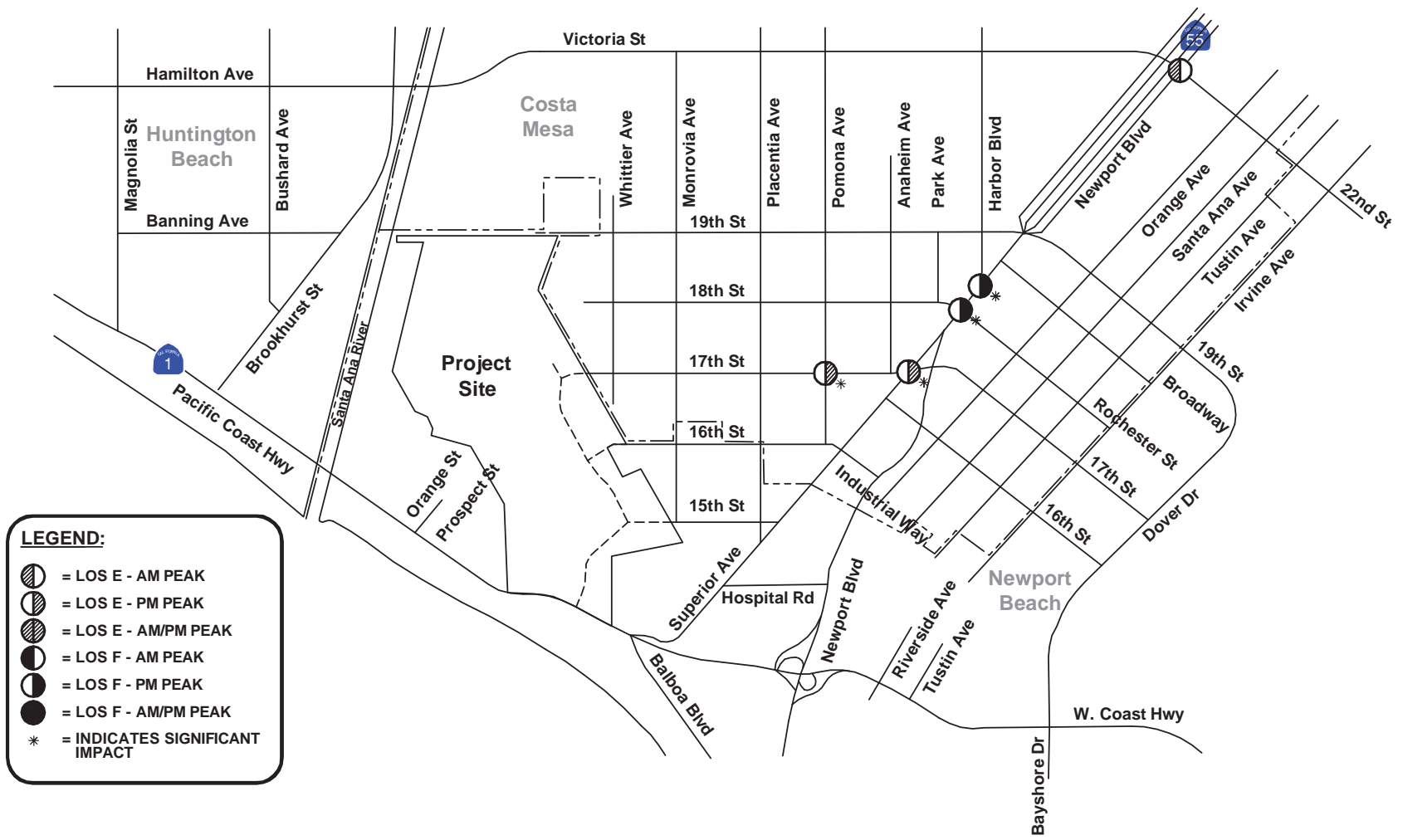
The deficient traffic study area intersections are shown on Exhibit 7-3, Existing Plus Alternative C: Deficient Intersections, and listed below.

- 26. Newport Boulevard at Victoria Street/22nd Street, (AM: LOS D; No Project impact).
- 36. Newport Boulevard at Harbor Boulevard which would decline from LOS E to LOS F;
- 37. Newport Boulevard at 18th Street/Rochester Street which would decline from LOS E to LOS F;
- 42. Pomona Avenue at 17th Street, which would decline from LOS B to LOS E;
- 43. Superior Avenue at 17th Street, which would decline from LOS C to LOS E)

City of Costa Mesa

- 26. Newport Boulevard at Victoria Street/22nd Street (AM: LOS E, no impact)
- 36. Newport Boulevard at Harbor Boulevard (PM: LOS F, **Alternative C impact: 0.099**)
- 37. Newport Boulevard at 18th Street/Rochester Street (PM: LOS F, **Alternative C impact: 0.101**)
- 42. Pomona Avenue at 17th Street (PM: LOS E, **Alternative C impact at unsignalized intersection**)
- 43. Superior Avenue at 17th Street (PM: LOS E, **Alternative C impact 0.196**)

CMP Intersection: The intersection of Newport Boulevard at West Coast Highway is the only CMP intersection within the traffic study area. As with the proposed Project, this intersection would continue to operate at an acceptable level of service under Alternative C. No significant impact would occur with Alternative C or the proposed Project.



Source: Kimley-Horn and Associates, Inc. 2011

Existing Plus Alternative C: Deficient Intersections

Exhibit 7-3

Newport Banning Ranch EIR



**TABLE 7-8
 EXISTING PLUS ALTERNATIVE C: INTERSECTION OPERATIONS**

Intersection			Control	No Project Development				With Project (Alternative C)				Alternative C Impact			
				AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour		Change		Significant?	
				ICU/ Delay	LOS	ICU/ Delay	LOS	ICU/ Delay	LOS	ICU/ Delay	LOS	AM	PM	AM	PM
Newport Beach	1	Monrovia Ave/16 th St	U	8.80	A	8.20	A	10.90	B	10.50	B	2.100	2.300	No	No
	2	Placentia Ave/15 th St	S	0.45	A	0.34	A	0.59	A	0.49	A	0.140	0.144	No	No
	3	Superior Ave/15 th St	U	19.60	C	22.90	C	21.00	C	25.80	D	1.400	2.900	No	No
	4	Superior Ave/Placentia Ave	S	0.50	A	0.57	A	0.49	A	0.52	A	-0.016	-0.053	No	No
	5	Newport Blvd/Hospital Rd	S	0.49	A	0.58	A	0.49	A	0.58	A	0.000	0.000	No	No
	6	Orange St/West Coast Hwy	S	0.73	C	0.66	B	0.74	C	0.68	B	0.011	0.028	No	No
	7	Prospect St/West Coast Hwy	S	0.72	C	0.66	B	0.74	C	0.69	B	0.011	0.028	No	No
	8	Superior Ave/West Coast Hwy	S	0.65	B	0.65	B	0.66	B	0.60	A	0.012	-0.053	No	No
	9	Newport Blvd/West Coast Hwy	S	0.83	D	0.64	B	0.85	D	0.66	B	0.021	0.021	No	No
	10	Riverside Ave/West Coast Hwy	S	0.65	B	0.71	C	0.67	B	0.74	C	0.017	0.027	No	No
	11	Tustin Ave/West Coast Hwy	S	0.65	B	0.58	A	0.67	B	0.62	B	0.017	0.040	No	No
	12	Dover Dr/West Coast Hwy	S	0.63	B	0.71	C	0.64	B	0.72	C	0.008	0.013	No	No
58	Monrovia Ave/15 th Street	U	7.50	A	7.40	A	9.20	A	9.30	A	1.700	1.900	No	No	
Huntington Beach	13	Magnolia St/Hamilton Ave	S	0.53	A	0.54	A	0.55	A	0.56	A	0.020	0.024	No	No
	14	Bushard St/Hamilton Ave	S	0.42	A	0.53	A	0.43	A	0.54	A	0.003	0.008	No	No
	15	Brookhurst St/Hamilton Ave (Victoria St)	S	0.67	B	0.64	B	0.68	B	0.64	B	0.003	0.006	No	No
	16	Magnolia St/Banning Ave	S	0.23	A	0.27	A	0.25	A	0.28	A	0.016	0.011	No	No
	17	Bushard St/Banning Ave	U	9.90	A	9.00	A	9.90	A	9.00	A	0.000	0.000	No	No
	18	Brookhurst St/Banning Ave	S	0.25	A	0.24	A	0.26	A	0.25	A	0.005	0.012	No	No
	19	Magnolia St/Pacific Coast Hwy	S	0.48	A	0.58	A	0.48	A	0.58	A	0.007	0.007	No	No
	20	Brookhurst St/Bushard St	S	0.32	A	0.32	A	0.32	A	0.34	A	0.005	0.016	No	No
	21	Brookhurst St/Pacific Coast Hwy	S	0.56	A	0.65	B	0.57	A	0.68	B	0.013	0.028	No	No

TABLE 7-8 (Continued)
EXISTING PLUS ALTERNATIVE C: INTERSECTION OPERATIONS

Intersection			Control	No Project Development				With Project (Alternative C)				Alternative C Impact			
				AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour		Change		Significant?	
				ICU/ Delay	LOS	ICU/ Delay	LOS	ICU/ Delay	LOS	ICU/ Delay	LOS	AM	PM	AM	PM
Costa Mesa	22	Placentia Ave/Victoria St	S	0.74	C	0.79	C	0.75	C	0.81	D	0.004	0.016	No	No
	23	Pomona Ave/Victoria St	S	0.63	B	0.66	B	0.63	B	0.66	B	0.000	0.000	No	No
	24	Harbor Blvd/Victoria St	S	0.70	B	0.78	C	0.71	C	0.79	C	0.006	0.014	No	No
	25	Newport Blvd/Victoria St	S	0.55	A	0.45	A	0.55	A	0.45	A	0.000	0.000	No	No
	26	Newport Blvd/Victoria St (22 nd St)	S	0.96	E	0.57	A	0.96	E	0.57	A	0.000	0.000	No	No
	27	Whittier Ave/19 th St	U	9.90	A	9.00	A	9.90	A	9.00	A	0.000	0.000	No	No
	28	Monrovia Ave/19 th St	U	16.90	C	13.00	B	16.90	C	13.00	B	0.000	0.000	No	No
	29	Placentia Ave/19 th St	S	0.48	A	0.68	B	0.49	A	0.70	B	0.006	0.016	No	No
	30	Pomona Ave/19 th St	S	0.47	A	0.57	A	0.47	A	0.57	A	0.004	0.004	No	No
	31	Anaheim Ave/19 th St	S	0.47	A	0.55	A	0.47	A	0.55	A	0.004	0.003	No	No
	32	Park Ave/19 th St	S	0.44	A	0.54	A	0.45	A	0.55	A	0.004	0.003	No	No
	33	Harbor Blvd/19 th St	S	0.40	A	0.56	A	0.40	A	0.58	A	0.003	0.024	No	No
	34	Newport Blvd/19 th St	S	0.80	C	0.77	C	0.84	D	0.81	D	0.048	0.041	No	No
	35	Newport Blvd/Broadway	S	0.58	A	0.72	C	0.60	A	0.80	C	0.023	0.081	No	No
	36	Newport Blvd/Harbor Blvd	S	0.70	B	0.97	E	0.73	C	1.07	F	0.031	0.099	No	Yes
	37	Newport Blvd/18 th St (Rochester St)	S	0.73	C	0.97	E	0.77	C	1.07	F	0.045	0.101	No	Yes
	38	Placentia Ave/18 th St	S	0.44	A	0.47	A	0.45	A	0.53	A	0.011	0.061	No	No
	39	Whittier Ave/17 th St	U	7.40	A	7.30	A	10.20	B	12.10	B	2.800	4.800	No	No
	40	Monrovia Ave/17 th St	U	9.50	A	8.80	A	13.90	B	16.00	C	4.400	7.200	No	No
	41	Placentia Ave/17 th St	S	0.41	A	0.52	A	0.46	A	0.67	B	0.052	0.147	No	No
42	Pomona Ave/17 th St	U	13.40	B	13.90	B	20.80	C	39.00	E	7.400	25.100	No	Yes	
43	Superior Ave/17 th St	S	0.65	B	0.75	C	0.77	C	0.94	E	0.123	0.196	No	Yes	
44	Newport Blvd/17 th St	S	0.74	C	0.81	D	0.80	C	0.86	D	0.058	0.053	No	No	
45	Orange Ave/17 th St	S	0.42	A	0.61	B	0.44	A	0.64	B	0.024	0.031	No	No	
46	Santa Ana Ave/17 th St	S	0.39	A	0.60	A	0.42	A	0.63	B	0.024	0.031	No	No	

TABLE 7-8 (Continued)
EXISTING PLUS ALTERNATIVE C: INTERSECTION OPERATIONS

Intersection			Control	No Project Development				With Project (Alternative C)				Alternative C Impact							
				AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour		Change		Significant?					
				ICU/ Delay	LOS	ICU/ Delay	LOS	ICU/ Delay	LOS	ICU/ Delay	LOS	AM	PM	AM	PM				
Costa Mesa	47	Tustin Ave/17 th St	S	0.47	A	0.64	B	0.50	A	0.67	B	0.023	0.030	No	No				
	48	Irvine Ave/17 th St	S	0.49	A	0.63	B	0.51	A	0.65	B	0.024	0.020	No	No				
	49	Placentia Ave/16 th St	S	0.32	A	0.29	A	0.36	A	0.40	A	0.042	0.109	No	No				
	50	Superior Ave/16 th St	S	0.47	A	0.43	A	0.57	A	0.57	A	0.095	0.145	No	No				
	51	Newport Blvd/16 th St	S	0.49	A	0.54	A	0.51	A	0.56	A	0.017	0.018	No	No				
	52	Bluff Rd/Victoria St	S	Future Intersection				Future Intersection				N/A		N/A					
On-Site	53	Bluff Rd/19 th St	S	Future Intersections				Future Intersection				N/A		N/A					
	54	Bluff Rd/17 th St	S					A		0.15		A		0.133	0.154	No	No		
	55	Bluff Rd/16 th St	U					14.60		B		19.00		C		14.60	19.00	No	No
	56	Bluff Rd/15 th St	S					0.18		A		0.28		A		0.18	0.276	No	No
	57	Bluff Rd/West Coast Hwy	S					0.61		B		0.76		C		0.606	0.763	No	No

ICU: Intersection Capacity Utilization; LOS: level of service; S: Signalized; U: Unsignalized; N/A: not applicable
Notes: Bold and shaded values indicate intersections operating at LOS E or F.
 Intersection operation is expressed in average seconds of delay per vehicle during the peak hour for unsignalized intersections using the HCM 2000 Methodology and is expressed in volume-to-capacity (v/c) for signalized intersections using the ICU Methodology.
 Source: Kimley-Horn 2011.

Traffic Phasing Ordinance Analysis

Year 2016 Without Alternative C Traffic Phasing Ordinance Analysis

Three intersections that are currently operating at a deficient LOS under Existing Conditions are forecasted to continue to operate at deficient levels of service in Year 2016 without development of the Project site:

City of Costa Mesa

26. Newport Boulevard at Victoria Street/22nd Street (AM: LOS F)
36. Newport Boulevard at Harbor Boulevard (PM: LOS F)
37. Newport Boulevard at 18th Street/Rochester Street (PM: LOS F)

Year 2016 With Alternative C Traffic Phasing Ordinance Analysis

This scenario includes completion of all Alternative C development by 2016, even though buildout is not anticipated in this timeframe. This analysis is needed to make the findings required for project approval set forth in Section 15.040.030(B)(2)(d) of the Traffic Phasing Ordinance (TPO). These findings relate to “project trips” rather than trips from “that portion of the project reasonably expected to be constructed and ready for occupancy within sixty (60) months of project approval”. “Project trips” refers to all trips generated by a proposed project.

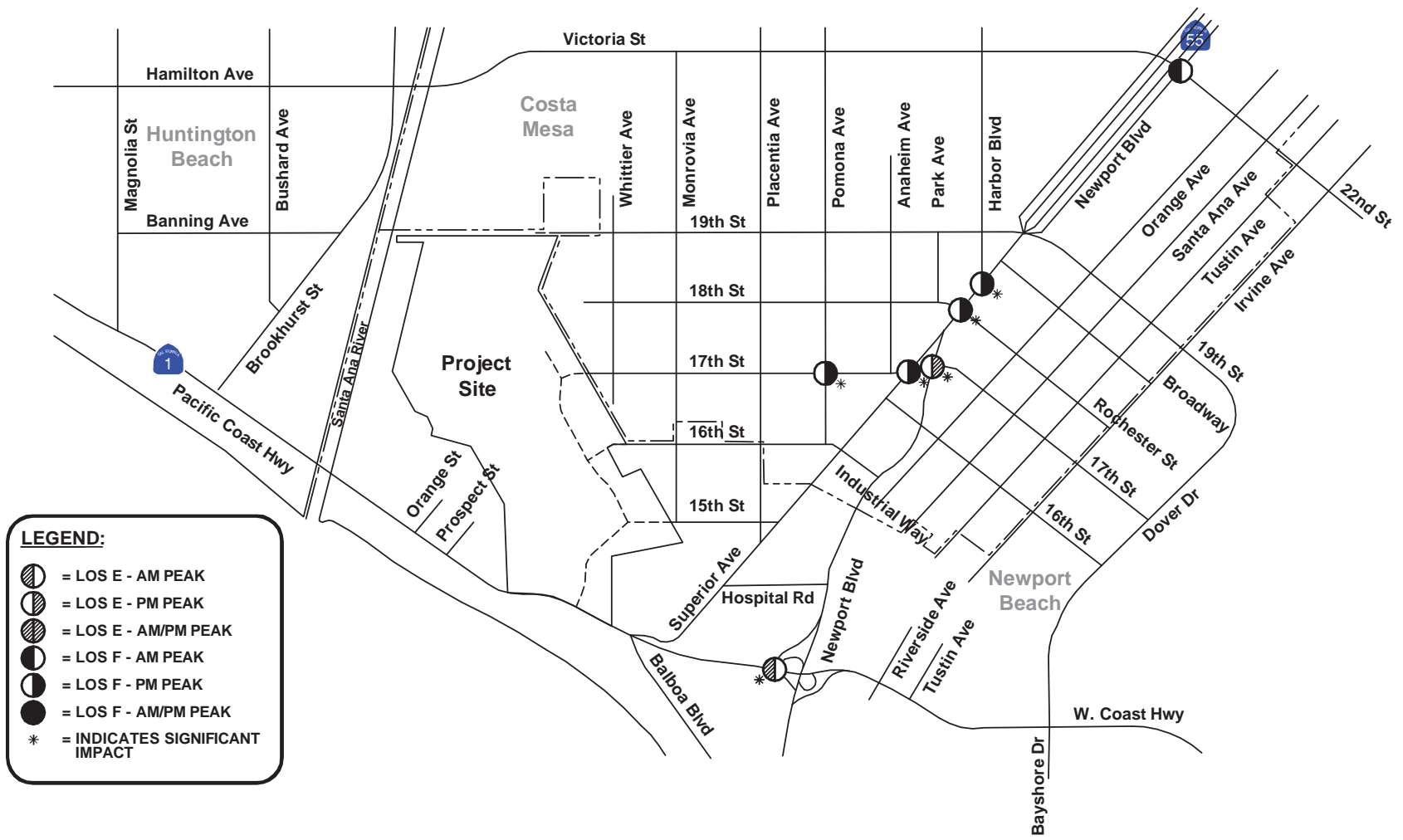
Intersection Levels of Service: Under the Year 2016 With Alternative C TPO scenario, Alternative C peak hour traffic volumes are added to the Year 2016 Without Alternative TPO traffic volumes; Bluff Road/North Bluff Road is assumed to be constructed through the Project site from West Coast Highway to 17th Street. Table 7-9 identifies the ICU/delay values and corresponding levels of service. As depicted in Exhibit 7-4, the seven intersections listed below would operate at deficient levels of service. Alternative C would significantly impact six of the seven intersections.

City of Newport Beach

9. Newport Boulevard at West Coast Highway (AM: LOS E; **Alternative C impact: 0.022**)

City of Costa Mesa

26. Newport Boulevard at Victoria Street/22nd Street (AM: LOS F; no impact)
36. Newport Boulevard at Harbor Boulevard (PM: LOS F; **Alternative C impact: 0.099**)
37. Newport Boulevard at 18th Street/Rochester Street (PM: LOS F; **Alternative C impact: 0.100**)
42. Pomona Avenue at 17th Street (PM: LOS F; **Alternative C impact at unsignalized intersection**)
43. Superior Avenue at 17th Street (PM: LOS F; **Alternative C impact: 0.196**)
44. Newport Boulevard at 17th Street (PM: LOS E; **Alternative C impact: 0.053**)



Source: Kimley-Horn and Associates, Inc. 2011

Year 2016 With Alternative C - TPO Analysis: Deficient Intersections

Exhibit 7-4

Newport Banning Ranch EIR



**TABLE 7-9
 YEAR 2016 WITH ALTERNATIVE C TPO ANALYSIS: INTERSECTION OPERATIONS**

Intersection			Control	No Project Development				With Alternative C				Alternative C Impact			
				AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour		Change		Significant?	
				ICU/ Delay	LOS	ICU/ Delay	LOS	ICU/ Delay	LOS	ICU/ Delay	LOS	AM	PM	AM	PM
Newport Beach	1	Monrovia Ave/16 th St	U	8.80	A	8.20	A	10.90	B	10.50	B	2.100	2.300	No	No
	2	Placentia Ave/15 th St	S	0.45	A	0.35	A	0.59	A	0.49	A	0.141	0.143	No	No
	3	Superior Ave/15 th St	U	20.90	C	28.10	D	22.30	C	32.10	D	1.400	4.000	No	No
	4	Superior Ave/Placentia Ave	S	0.53	A	0.60	A	0.51	A	0.55	A	-0.014	-0.045	No	No
	5	Newport Blvd/Hospital Rd	S	0.53	A	0.64	B	0.53	A	0.64	B	0.000	0.000	No	No
	6	Orange St/West Coast Hwy	S	0.79	C	0.72	C	0.80	C	0.75	C	0.012	0.028	No	No
	7	Prospect St/West Coast Hwy	S	0.78	C	0.72	C	0.79	C	0.72	C	0.012	-0.002	No	No
	8	Superior Ave/West Coast Hwy	S	0.70	B	0.70	B	0.71	C	0.65	B	0.012	-0.051	No	No
	9	Newport Blvd/West Coast Hwy	S	0.90	D	0.70	B	0.93	E	0.73	C	0.022	0.021	Yes	No
	10	Riverside Ave/West Coast Hwy	S	0.73	C	0.77	C	0.75	C	0.80	C	0.018	0.027	No	No
	11	Tustin Ave/West Coast Hwy	S	0.73	C	0.64	B	0.75	C	0.68	B	0.018	0.004	No	No
	12	Dover Dr/West Coast Hwy	S	0.69	B	0.78	C	0.69	B	0.80	C	0.008	0.013	No	No
58	Monrovia Ave/15 th Street	U	7.50	A	7.40	A	9.20	A	9.30	A	1.700	1.900	No	No	
Huntington Beach	13	Magnolia St/Hamilton Ave	S	0.57	A	0.57	A	0.59	A	0.60	A	0.020	0.024	No	No
	14	Bushard St/Hamilton Ave	S	0.45	A	0.56	A	0.45	A	0.57	A	0.003	0.009	No	No
	15	Brookhurst St/Hamilton Ave (Victoria St)	S	0.72	C	0.68	B	0.72	C	0.68	B	0.003	0.006	No	No
	16	Magnolia St/Banning Ave	S	0.25	A	0.30	A	0.26	A	0.31	A	0.016	0.010	No	No
	17	Bushard St/Banning Ave	U	10.20	B	9.20	A	10.20	B	9.20	A	0.000	0.000	No	No
	18	Brookhurst St/Banning Ave	S	0.27	A	0.25	A	0.27	A	0.26	A	0.005	0.012	No	No
	19	Magnolia St/Pacific Coast Hwy	S	0.52	A	0.63	B	0.52	A	0.63	B	0.008	0.006	No	No
	20	Brookhurst St/Bushard St	S	0.34	A	0.35	A	0.35	A	0.36	A	0.004	0.017	No	No
21	Brookhurst St/Pacific Coast Hwy	S	0.61	B	0.71	C	0.62	B	0.74	C	0.014	0.032	No	No	

TABLE 7-9 (Continued)
YEAR 2016 WITH ALTERNATIVE C TPO ANALYSIS: INTERSECTION OPERATIONS

Intersection			Control	No Project Development				With Alternative C				Alternative C Impact			
				AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour		Change		Significant?	
				ICU/ Delay	LOS	ICU/ Delay	LOS	ICU/ Delay	LOS	ICU/ Delay	LOS	AM	PM	AM	PM
Costa Mesa	22	Placentia Ave/Victoria St	S	0.80	C	0.85	D	0.80	C	0.86	D	0.005	0.016	No	No
	23	Pomona Ave/Victoria St	S	0.67	B	0.71	C	0.67	B	0.71	C	0.000	0.000	No	No
	24	Harbor Blvd/Victoria St	S	0.75	C	0.83	D	0.76	C	0.85	D	0.006	0.014	No	No
	25	Newport Blvd/Victoria St	S	0.59	A	0.48	A	0.59	A	0.48	A	0.000	0.000	No	No
	26	Newport Blvd/Victoria St (22 nd St)	S	1.03	F	0.61	B	1.03	F	0.61	B	0.000	0.000	No	No
	27	Whittier Ave/19 th St	U	10.30	B	9.20	A	10.30	B	9.20	A	0.000	0.000	No	No
	28	Monrovia Ave/19 th St	U	19.90	C	14.00	B	19.90	C	14.00	B	0.000	0.000	No	No
	29	Placentia Ave/19 th St	S	0.52	A	0.73	C	0.53	A	0.75	C	0.006	0.015	No	No
	30	Pomona Ave/19 th St	S	0.50	A	0.61	B	0.50	A	0.61	B	0.004	0.003	No	No
	31	Anaheim Ave/19 th St	S	0.50	A	0.58	A	0.51	A	0.59	A	0.004	0.003	No	No
	32	Park Ave/19 th St	S	0.47	A	0.58	A	0.48	A	0.59	A	0.004	0.003	No	No
	33	Harbor Blvd/19 th St	S	0.43	A	0.60	A	0.43	A	0.63	B	0.003	0.025	No	No
	34	Newport Blvd/19 th St	S	0.86	D	0.83	D	0.90	D	0.87	D	0.047	0.041	No	No
	35	Newport Blvd/Broadway	S	0.62	B	0.78	C	0.64	B	0.87	D	0.023	0.081	No	No
	36	Newport Blvd/Harbor Blvd	S	0.75	C	1.06	F	0.78	C	1.16	F	0.030	0.099	No	Yes
	37	Newport Blvd/18 th St (Rochester St)	S	0.79	C	1.07	F	0.84	D	1.17	F	0.045	0.100	No	Yes
	38	Placentia Ave/18 th St	S	0.47	A	0.50	A	0.48	A	0.56	A	0.010	0.066	No	No
	39	Whittier Ave/17 th St	U	7.40	A	7.40	A	10.30	B	12.40	B	2.900	5.000	No	No
	40	Monrovia Ave/17 th St	U	9.90	A	9.00	A	14.90	B	17.30	C	5.000	8.300	No	No
	41	Placentia Ave/17 th St	S	0.44	A	0.56	A	0.49	A	0.71	C	0.052	0.152	No	No
	42	Pomona Ave/17 th St	U	14.80	B	15.50	C	25.10	D	51.30	F	10.300	35.800	No	Yes
43	Superior Ave/17 th St	S	0.70	B	0.81	D	0.82	D	1.01	F	0.122	0.196	No	Yes	
44	Newport Blvd/17 th St	S	0.80	C	0.88	D	0.86	D	0.93	E	0.063	0.053	No	Yes	
45	Orange Ave/17 th St	S	0.44	A	0.66	B	0.47	A	0.69	B	0.024	0.031	No	No	
46	Santa Ana Ave/17 th St	S	0.42	A	0.64	B	0.45	A	0.67	B	0.024	0.030	No	No	

TABLE 7-9 (Continued)
YEAR 2016 WITH ALTERNATIVE C TPO ANALYSIS: INTERSECTION OPERATIONS

Intersection			Control	No Project Development				With Alternative C				Alternative C Impact			
				AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour		Change		Significant?	
				ICU/ Delay	LOS	ICU/ Delay	LOS	ICU/ Delay	LOS	ICU/ Delay	LOS	AM	PM	AM	PM
Costa Mesa	47	Tustin Ave/17 th St	S	0.51	A	0.70	B	0.54	A	0.73	C	0.024	0.030	No	No
	48	Irvine Ave/17 th St	S	0.53	A	0.69	B	0.55	A	0.71	C	0.023	0.021	No	No
	49	Placentia Ave/16 th St	S	0.34	A	0.32	A	0.38	A	0.43	A	0.039	0.112	No	No
	50	Superior Ave/16 th St	S	0.52	A	0.49	A	0.61	B	0.64	B	0.093	0.145	No	No
	51	Newport Blvd/16 th St	S	0.55	A	0.60	A	0.56	A	0.62	B	0.016	0.018	No	No
	52	Bluff Rd/Victoria St	S	Future Intersection				Future Intersections				N/A		N/A	
On-Site	53	Bluff Rd/19 th St	S	Future Intersections				Future Intersection				N/A		N/A	
	54	Bluff Rd/17 th St	S					0.14	A	0.17	A	0.140	0.165	No	No
	55	Bluff Rd/16 th St	U					14.60	B	19.60	C	14.600	19.600	No	No
	56	Bluff Rd/15 th St	S					0.18	A	0.28	A	0.180	0.300	No	No
	57	Bluff Rd/West Coast Hwy	S					0.65	B	0.81	D	0.648	0.805	No	No

ICU: Intersection Capacity Utilization; LOS: level of service; S: Signalized; U: Unsignalized; N/A: not applicable
Notes: Bold and shaded values indicate intersections operating at LOS E or F.
 Intersection operation is expressed in average seconds of delay per vehicle during the peak hour for unsignalized intersections using the HCM 2000 Methodology and is expressed in volume-to-capacity (v/c) for signalized intersections using the ICU Methodology.
 Source: Kimley-Horn 2010.

It should be noted that the impacts at the Newport Boulevard at Victoria Street/22nd Street intersection are not attributable to Alternative C. Additionally, when comparing the two scenarios (*Year 2016 TPO Analysis with Project* and *Year 2016 TPO Analysis with Alternative C*), the proposed Project would impact two additional intersections: Monrovia Avenue at 19th Street and Newport Boulevard at 19th Street.

Year 2016 Cumulative Conditions

Year 2016 Cumulative Without Alternative C

Traffic from the cumulative projects was added to the Year 2016 Without Alternative C TPO peak hour forecasts to develop Year 2016 Cumulative Without Alternative C traffic forecasts.

Intersection Levels of Service: In addition to the three intersections currently (i.e., Existing Conditions) operating at deficient levels of service, one additional intersection is forecasted to operate at a deficient LOS with the addition of cumulative development traffic. The LOS at Newport Boulevard and West Coast Highway would further decline to LOS E with the addition of cumulative traffic. All other traffic study area intersections are forecasted to operate at an acceptable LOS (LOS D or better) in both peak hours.

City of Newport Beach

9. Newport Boulevard at West Coast Highway (AM: LOS E)

City of Costa Mesa

26. Newport Boulevard at Victoria Street/22nd Street (AM: LOS F)
36. Newport Boulevard at Harbor Boulevard (PM: LOS F)
37. Newport Boulevard at 18th Street/Rochester Street (PM: LOS F)

CMP Intersection: The CMP intersection of Newport Boulevard at West Coast Highway is forecasted to operate at LOS E. This intersection is operating at an acceptable LOS (LOS E) based on CMP criteria.

State Highway Intersections: The intersections listed below are forecasted to operate at deficient levels of service; the intersection of Newport Boulevard at Victoria St/22nd Street is also deficient under Existing Conditions and would worsen from LOS D to LOS E. All other traffic study area intersections would continue to operate at acceptable levels of service (LOS C or better).

City of Costa Mesa

26. Newport Boulevard at Victoria Street/22nd Street, (AM: LOS E)
36. Newport Boulevard at Harbor Boulevard (PM: LOS D)
37. Newport Boulevard at 18th Street/Rochester Street (PM: LOS D)

Freeway Mainline Segments: All traffic study area freeway segments are forecasted to operate at acceptable levels of service (LOS D or better) under this scenario.

Year 2016 Cumulative With Alternative C

This is an analysis of future traffic conditions in 2016 that could be expected to result from traffic associated with cumulative development with buildout of Alternative C. Under this scenario, Alternative C peak hour traffic volumes are added to the Year 2016 Cumulative Without Alternative C traffic volumes. The following on-site roadway improvements are assumed to be implemented by 2016:

- Bluff Road and North Bluff Road would be constructed through the Project site from West Coast Highway to just north of 17th Street. Bluff Road would be signalized at West Coast Highway and at the Sunset Ridge Park intersection.
- 15th Street would be constructed to Bluff Road and signalized.
- 16th Street would be constructed to North Bluff Road.
- 17th Street would be constructed to North Bluff Road and signalized.
- Other on-site local roads would be constructed to support the site development.

Intersection Levels of Service: Table 7-10 identifies the peak hour ICU/delay values and the corresponding levels of service for the traffic study area intersections for the Year 2016 Cumulative With Alternative C scenario. As depicted in Exhibit 7-5, Year 2016 Cumulative Conditions With Alternative C: Deficient Intersections, with the addition of Alternative C traffic, intersections listed below are forecasted to operate at deficient levels of service in 2016.

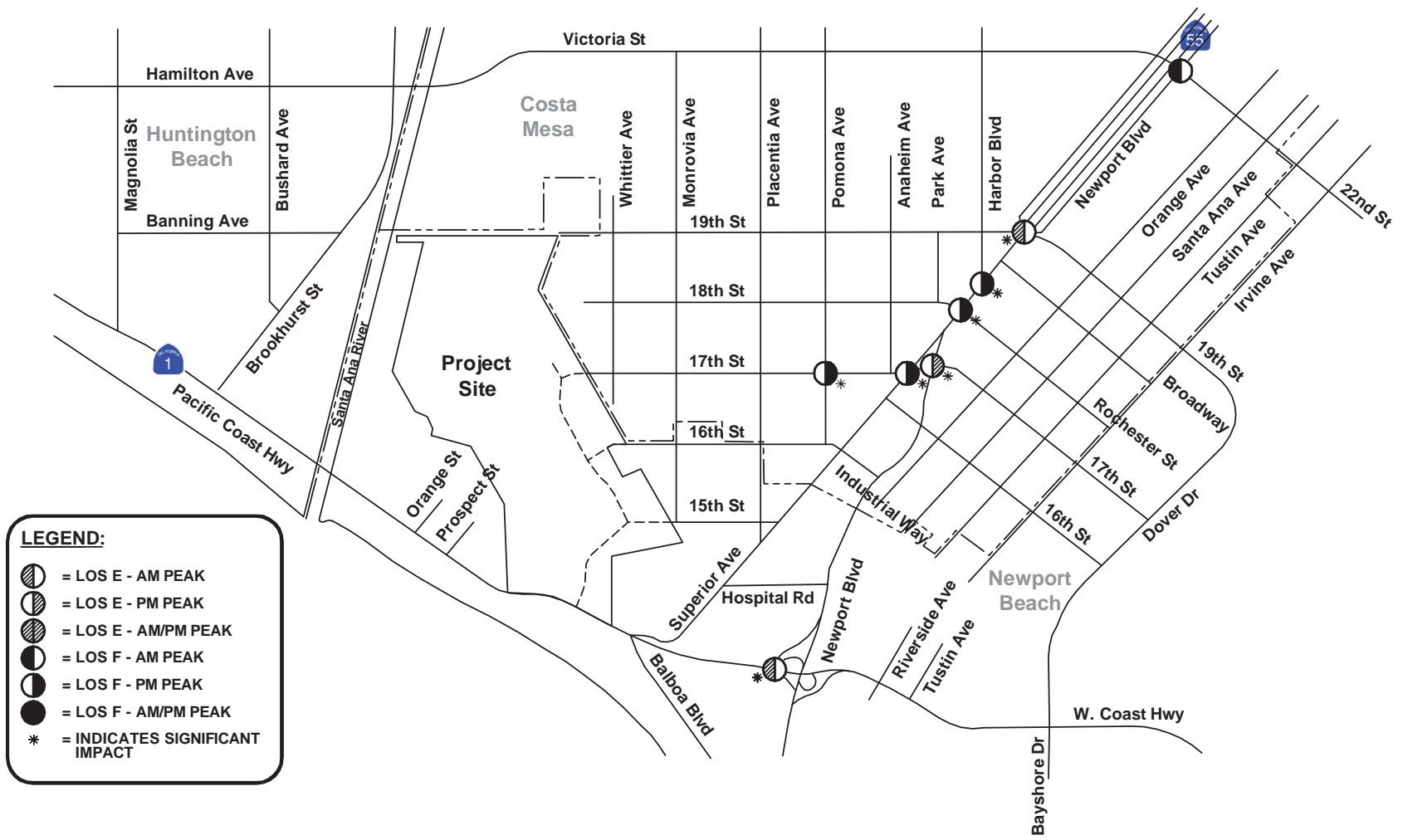
City of Newport Beach

9. Newport Boulevard at West Coast Highway (AM: LOS E, **Alternative C impact: 0.022**)

City of Costa Mesa

26. Newport Boulevard at Victoria Street/22nd Street (AM: LOS F, no impact)
34. Newport Boulevard at 19th Street (AM: LOS E, **Alternative C impact: 0.047**)
36. Newport Boulevard at Harbor Boulevard (PM: LOS F, **Alternative C impact: 0.100**)
37. Newport Boulevard at 18th Street/Rochester Street (PM: LOS F, **Alternative C impact: 0.100**)
42. Pomona Avenue at 17th Street (PM: LOS F, **Alternative C impact to unsignalized intersection**)
43. Superior Avenue at 17th Street (PM: LOS F, **Alternative C impact: 0.196**)
44. Newport Boulevard at 17th Street (PM: LOS E, **Alternative C impact: 0.045**)

It is noted that the Newport Beach intersection of Newport Boulevard at West Coast Highway is forecasted to operate at a deficient level of service in 2016 both with the proposed Project or Alternative C in the AM peak period. Based on the significance criteria set forth in this EIR, the addition of either the Project-related traffic or Alternative C traffic would significantly impact this intersection.



Source: Kimley-Horn and Associates, Inc. 2011

Year 2016 Cumulative Conditions With Alternative C: Deficient Intersections

Exhibit 7-5

Newport Banning Ranch EIR



**TABLE 7-10
 YEAR 2016 CUMULATIVE WITH ALTERNATIVE C: INTERSECTION OPERATIONS**

Intersection			Control	No Project Development				With Alternative C				Alternative C Impact			
				AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour		Change		Significant ?	
				ICU/ Delay	LOS	ICU/ Delay	LOS	ICU/ Delay	LOS	ICU/ Delay	LOS	AM	PM	AM	PM
Newport Beach	1	Monrovia Ave/16th St	U	9.60	A	8.60	A	12.10	B	11.60	B	2.500	3.000	No	No
	2	Placentia Ave/15th St	S	0.49	A	0.38	A	0.64	B	0.53	A	0.141	0.143	No	No
	3	Superior Ave/15th St	U	21.00	C	28.80	D	22.50	C	33.10	D	1.500	4.300	No	No
	4	Superior Ave/Placentia Ave	S	0.54	A	0.66	B	0.51	A	0.60	A	-0.027	-0.062	No	No
	5	Newport Blvd/Hospital Rd	S	0.54	A	0.65	B	0.54	A	0.65	B	0.000	0.000	No	No
	6	Orange St/West Coast Hwy	S	0.81	D	0.76	C	0.83	D	0.78	C	0.012	0.027	No	No
	7	Prospect St/West Coast Hwy	S	0.80	C	0.76	C	0.81	D	0.76	C	0.012	-0.002	No	No
	8	Superior Ave/West Coast Hwy	S	0.72	C	0.74	C	0.73	C	0.69	B	0.013	-0.047	No	No
	9	Newport Blvd/West Coast Hwy	S	0.94	E	0.76	C	0.96	E	0.79	C	0.022	0.022	Yes	No
	10	Riverside Ave/West Coast Hwy	S	0.77	C	0.82	D	0.79	C	0.84	D	0.018	0.027	No	No
	11	Tustin Ave/West Coast Hwy	S	0.77	C	0.68	B	0.79	C	0.72	C	0.017	0.041	No	No
	12	Dover Dr/West Coast Hwy	S	0.72	C	0.85	D	0.73	C	0.86	D	0.009	0.013	No	No
	58	Monrovia Ave/15th Street	U	7.70	A	7.50	A	9.40	A	9.70	A	1.700	2.200	No	No
Huntington Beach	13	Magnolia St/Hamilton Ave	S	0.65	B	0.64	B	0.67	B	0.66	B	0.002	0.023	No	No
	14	Bushard St/Hamilton Ave	S	0.47	A	0.59	A	0.48	A	0.60	A	0.003	0.009	No	No
	15	Brookhurst St/Hamilton Ave (Victoria St)	S	0.73	C	0.71	C	0.73	C	0.72	C	0.003	0.006	No	No
	16	Magnolia St/Banning Ave	S	0.26	A	0.33	A	0.27	A	0.34	A	0.015	0.011	No	No
	17	Bushard St/Banning Ave	U	10.30	B	9.40	A	10.30	B	9.40	A	0.000	0.000	No	No
	18	Brookhurst St/Banning Ave	S	0.27	A	0.26	A	0.28	A	0.27	A	0.000	0.000	No	No
	19	Magnolia St/Pacific Coast Hwy	S	0.54	A	0.69	B	0.55	A	0.70	B	0.003	0.007	No	No
	20	Brookhurst St/Bushard St	S	0.35	A	0.36	A	0.35	A	0.37	A	0.005	0.017	No	No
	21	Brookhurst St/Pacific Coast Hwy	S	0.63	B	0.75	C	0.65	B	0.78	C	0.014	0.032	No	No

TABLE 7-10 (Continued)
YEAR 2016 CUMULATIVE WITH ALTERNATIVE C: INTERSECTION OPERATIONS

Intersection			Control	No Project Development				With Alternative C				Alternative C Impact			
				AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour		Change		Significant ?	
				ICU/ Delay	LOS	ICU/ Delay	LOS	ICU/ Delay	LOS	ICU/ Delay	LOS	AM	PM	AM	PM
Costa Mesa	22	Placentia Ave/Victoria St	S	0.86	D	0.86	D	0.86	D	0.88	D	0.005	0.016	No	No
	23	Pomona Ave/Victoria St	S	0.71	C	0.76	C	0.71	C	0.76	C	0.000	0.000	No	No
	24	Harbor Blvd/Victoria St	S	0.79	C	0.88	D	0.80	C	0.90	D	0.006	0.013	No	No
	25	Newport Blvd/Victoria St	S	0.62	B	0.51	A	0.62	B	0.51	A	0.000	0.000	No	No
	26	Newport Blvd/Victoria St (22nd St)	S	1.10	F	0.65	B	1.10	F	0.65	B	0.000	0.000	No	No
	27	Whittier Ave/19th St	U	10.30	B	9.20	A	10.30	B	9.20	A	0.000	0.000	No	No
	28	Monrovia Ave/19th St	U	21.10	C	14.50	B	21.10	C	14.50	B	0.000	0.000	No	No
	29	Placentia Ave/19th St	S	0.54	A	0.76	C	0.55	A	0.78	C	0.013	0.016	No	No
	30	Pomona Ave/19th St	S	0.51	A	0.63	B	0.51	A	0.63	B	0.004	0.003	No	No
	31	Anaheim Ave/19th St	S	0.51	A	0.59	A	0.52	A	0.59	A	0.004	0.003	No	No
	32	Park Ave/19th St	S	0.48	A	0.59	A	0.49	A	0.59	A	0.004	0.003	No	No
	33	Harbor Blvd/19th St	S	0.44	A	0.63	B	0.44	A	0.64	B	0.003	0.013	No	No
	34	Newport Blvd/19th St	S	0.86	D	0.84	D	0.91	E	0.88	D	0.047	0.040	Yes	No
	35	Newport Blvd/Broadway	S	0.63	B	0.80	C	0.65	B	0.88	D	0.023	0.081	No	No
	36	Newport Blvd/Harbor Blvd	S	0.76	C	1.07	F	0.79	C	1.17	F	0.031	0.100	No	Yes
	37	Newport Blvd/18th St (Rochester St)	S	0.80	C	1.08	F	0.85	D	1.18	F	0.045	0.100	No	Yes
	38	Placentia Ave/18th St	S	0.52	A	0.54	A	0.53	A	0.60	A	0.010	0.066	No	No
	39	Whittier Ave/17th St	U	7.40	A	7.40	A	10.30	B	12.40	B	2.900	5.000	No	No
	40	Monrovia Ave/17th St	U	11.10	B	9.90	A	18.80	C	24.80	C	7.700	14.900	No	No
	41	Placentia Ave/17th St	S	0.50	A	0.60	A	0.55	A	0.75	C	0.052	0.152	No	No
42	Pomona Ave/17th St	U	15.30	C	16.60	C	27.20	D	58.40	F	11.900	41.800	No	Yes	
43	Superior Ave/17th St	S	0.70	B	0.82	D	0.83	D	1.02	F	0.123	0.196	No	Yes	
44	Newport Blvd/17th St	S	0.80	C	0.88	D	0.86	D	0.93	E	0.060	0.045	No	Yes	
45	Orange Ave/17th St	S	0.45	A	0.66	B	0.47	A	0.69	B	0.024	0.031	No	No	

TABLE 7-10 (Continued)
YEAR 2016 CUMULATIVE WITH ALTERNATIVE C: INTERSECTION OPERATIONS

Intersection			Control	No Project Development				With Alternative C				Alternative C Impact				
				AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour		Change		Significant ?		
				ICU/ Delay	LOS	ICU/ Delay	LOS	ICU/ Delay	LOS	ICU/ Delay	LOS	AM	PM	AM	PM	
Costa Mesa	46	Santa Ana Ave/17th St	S	0.43	A	0.65	B	0.45	A	0.68	B	0.024	0.030	No	No	
	47	Tustin Ave/17th St	S	0.52	A	0.71	C	0.54	A	0.74	C	0.024	0.031	No	No	
	48	Irvine Ave/17th St	S	0.56	A	0.71	C	0.58	A	0.73	C	0.024	0.020	No	No	
	49	Placentia Ave/16th St	S	0.39	A	0.35	A	0.41	A	0.47	A	0.018	0.114	No	No	
	50	Superior Ave/16th St	S	0.52	A	0.49	A	0.62	B	0.65	B	0.093	0.160	No	No	
	51	Newport Blvd/16th St	S	0.55	A	0.60	A	0.57	A	0.62	B	0.017	0.018	No	No	
On-Site	52	Bluff Rd/Victoria St	S	Future Intersections				Future Intersections				N/A		N/A		
	53	Bluff Rd/19th St	S					A		0.17	A	0.140	0.165	No	No	
	54	Bluff Rd/17th St	S					14.60		B	19.60	C	14.600	19.600	No	No
	55	Bluff Rd/16th St	U					0.18		A	0.28	A	0.180	0.276	No	No
	56	Bluff Rd/15th St	S					0.67		B	0.84	D	0.672	0.839	No	No
	57	Bluff Rd/West Coast Hwy	S													

Notes:
 S = Signalized, U=Unsignalized
Bold and shaded values indicate intersections operating at LOS E or F.
 Intersection operation is expressed in average seconds of delay per vehicle during the peak hour for unsignalized intersections using the HCM 2000 Methodology and is expressed in volume-to-capacity (v/c) for signalized intersections using the ICU Methodology.
 Source: Kimley-Horn 2011.

When compared to the proposed Project, Alternative C would impact one fewer intersection. The Costa Mesa intersection of Monrovia Avenue at 19th Street would be impacted by the proposed Project, but not by Alternative C. With respect to Newport Boulevard at Victoria Street/22nd Street, Newport Boulevard at Harbor Boulevard, and Newport Boulevard at 18th Street/Rochester Street, these three Costa Mesa intersections are currently (Existing Conditions) operating and are forecasted to continue to operate at deficient levels of service. Based on the significance criteria, the addition of traffic related to Alternative C and the proposed Project would significantly impact six of the seven Costa Mesa intersections.

CMP Intersection: The CMP intersection of Newport Boulevard at West Coast Highway is forecasted to operate at LOS E without and with the Project. The proposed Project would not cause the intersection to fall below the CMP LOS standards. Therefore, no significant impact would occur.

State Highway Intersections: Table 7-11 identifies the peak hour intersection delay values for the *Year 2016 Cumulative with Alternative C* scenario.

The following are the deficient intersections, as well as the delays in seconds that are attributable to Alternative C.

City of Costa Mesa

- 26. Newport Boulevard at Victoria Street/22nd Street (AM: LOS E; Alternative C: no impact)
- 36. Newport Boulevard at Harbor Boulevard (PM: LOS E; Alternative C: no impact; 22.5)
- 37. Newport Boulevard at 18th Street/Rochester Street (PM: LOS E; Alternative C: no impact; 22.7)
- 44. Newport Boulevard at 17th Street (PM: LOS D; Alternative C: **Alternative C impact; 4.2**)

Three of the intersections (26, 36, and 37) are forecasted to operate at LOS D or worse without the Project. As set forth in the EIR, the significance criteria for Caltrans intersections identifies that a significant impact occurs when project-generated traffic changes the level of service from an acceptable operation (LOS A, B, or C) to a deficient operation (LOS D, E, or F). Of the four intersections identified above, only the Newport Boulevard at 17th Street intersection would change from a LOS C to a LOS D, resulting in a significant impact with Alternative C.

**TABLE 7-11
 YEAR 2016 CUMULATIVE WITH ALTERNATIVE C: STATE HIGHWAY OPERATIONS**

Intersection		Control	No Project Development				With Alternative C				Alternative C Impact			
			AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour		Change		Significant?	
			Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS	AM	PM	AM	PM
5	Newport Blvd/Hospital Rd	S	22.3	C	23.3	C	22.3	C	23.3	C	0.0	0.0	No	No
6	Orange St/West Coast Hwy	S	6.5	A	5.5	A	6.5	A	5.6	A	0.0	0.1	No	No
7	Prospect St/West Coast Hwy	S	11.6	B	5.5	A	11.6	B	5.4	A	0.0	-0.1	No	No
8	Superior Ave/West Coast Hwy	S	24.9	C	29.8	C	23.9	C	27.1	C	-1.0	-2.7	No	No
9	Newport Blvd/West Coast Hwy	S	16.8	B	17.1	B	17.6	B	17.1	B	0.8	0.0	No	No
10	Riverside Ave/West Coast Hwy	S	11.8	B	14.4	B	12.0	B	15.1	B	0.2	0.7	No	No
11	Tustin Ave/West Coast Hwy	S	30.6	C	5.7	A	33.3	C	7.1	A	2.7	1.4	No	No
12	Dover Dr/West Coast Hwy	S	20.5	C	24.2	C	20.5	C	24.5	C	0.0	0.3	No	No
19	Magnolia St/Pacific Coast Hwy	S	15.6	B	15.9	B	15.7	B	16.1	B	0.1	0.2	No	No
21	Brookhurst St/Pacific Coast Hwy	S	18.0	B	16.2	B	18.0	B	16.9	B	0.0	0.7	No	No
25	Newport Blvd/Victoria St	S	19.6	B	20.6	C	19.6	B	20.6	C	0.0	0.0	No	No
26	Newport Blvd/Victoria St (22 nd St)	S	58.8	E	24.7	C	58.8	E	24.7	C	0.0	0.0	No	No
34	Newport Blvd/19 th St	S	25.2	C	25.2	C	26.1	C	26.1	C	0.9	0.9	No	No
35	Newport Blvd/Broadway	S	5.9	A	8.0	A	5.9	A	8.6	A	0.0	0.6	No	No
36	Newport Blvd/Harbor Blvd	S	11.7	B	37.1	D	12.1	B	59.6	E	0.4	22.5	No	No
37	Newport Blvd/18 th St (Rochester St)	S	13.6	B	39.9	D	15.4	B	62.6	E	1.8	22.7	No	No
44	Newport Blvd/17 th St	S	29.1	C	33.1	C	31.8	C	37.3	D	2.7	4.2	No	Yes
51	Newport Blvd/16 th St	S	9.9	A	8.3	A	9.7	A	8.2	A	-0.2	-0.1	No	No
57	Bluff Rd/West Coast Hwy	S	Future Intersection				11.5	B	16.7	B	11.5	16.7	No	No

LOS: level of service; S: Signalized

Notes: Bold and shaded values indicate intersections operating at LOS E or F.

Intersection operation is expressed in average seconds of delay per vehicle during the peak hour for signalized intersections using the HCM 2000 Methodology.

Negative changes in delay values may occur as a result of: the reassignment of traffic due to the Bluff Road connection to West Coast Highway; reassignment of trips in the traffic analysis model due to congestion at other intersections, and trips served more locally by the new project that would otherwise travel farther or in another direction.

Source: Kimley-Horn 2011.

Freeway Mainline: Under existing conditions, all study freeway segments are currently operating at LOS D or better for both peak hours. Without Alternative C, these freeway segments would continue to operate at acceptable levels of service in 2016. As identified in Table 7-12, the addition of Alternative C traffic would not cause additional freeway segments to worsen. No significant impacts would occur.

**TABLE 7-12
YEAR 2016 CUMULATIVE WITH ALTERNATIVE C
FREEWAY MAINLINE OPERATIONS**

Freeway Segment	Lanes	AM Peak Hour			PM Peak Hour		
		Volume	Density (pc/mi/ln)	LOS	Volume	Density (pc/mi/ln)	LOS
SR-55 Northbound							
19 th Street to Victoria/22 nd Streets	4	4,417	17.9	B	3,885	15.7	B
Victoria/22 nd Streets to Mesa Drive	4	5,952	24.1	C	5,236	21.2	C
Mesa Drive to I-405, San Diego Fwy	5	8,765	29.1	D	6,867	22.2	C
SR-55 Southbound							
I-405, San Diego Fwy to Mesa Drive	4	3,250	13.2	B	4,146	16.8	B
Mesa Drive to Victoria/22 nd Streets	4	4,028	16.3	B	4,628	18.7	C
Victoria/22 nd Streets to 19 th Street	3	2,989	16.1	B	3,435	18.5	C
pc/mi/ln: passenger cars per mile per lane; LOS: level of service							
Source: Kimley-Horn 2011.							

General Plan Buildout

General Plan Buildout peak hour traffic forecasts were developed using the City's Newport Beach Traffic Model (NBTM). The NBTM assumes buildout of the area and the region according to the General Plans of the Cities of Newport Beach, Huntington Beach, and Costa Mesa. The City of Newport Beach General Plan assumes a 2030 buildout year. The NBTM also assumes buildout of local arterials generally in accordance with the General Plan Circulation Elements of these jurisdictions and the Orange County MPAH. The Cities of Newport Beach, Costa Mesa, and Huntington Beach collect traffic impact/development fees and use Capital Improvement Program funds to provide anticipated traffic improvements. Such improvements are implemented based on project-specific traffic impact analyses and/or the findings of the jurisdictions' General Plan buildout assumptions and required traffic improvements necessary to accommodate projected growth.

For the intersection peak hour analysis, the NBTM network assumes buildout of local arterials in accordance with the Orange County MPAH, with the exception of some on-site roadways. Project-specific model runs using the NBTM as the base, were conducted to reflect the proposed Project network, which does not reflect the full Orange County MPAH improvements on the Project site. The following modifications are proposed as a part of Alternative C:

- North Bluff Road just north of 17th Street to 19th Street would not be constructed.
- Both Alternative C and the proposed Project propose the deletion of the second connection from Bluff Road to West Coast Highway and the designated extension of 15th Street west of Bluff Road. On the City of Newport Beach Circulation Element, this second connection is shown as the extension of 15th Street as a Primary (four-lane divided) roadway from Bluff Road to West Coast Highway. On the Orange County

MPAH, the second connection is shown as the extension of 17th Street west of Bluff Road to West Coast Highway as a Secondary (four-lane undivided) roadway between Bluff Road and 15th Street and as a Primary (four-lane divided) between 15th Street and West Coast Highway. The MPAH also shows an extension of 15th Street west of Bluff Road. The Traffic Impact Analysis finds that a second roadway connection is not required for either Alternative C or the proposed Project with the addition of cumulative traffic. This deletion would require a General Plan Amendment to the Newport Beach General Plan Circulation Element and an amendment to the Orange County MPAH.

19th Street Bridge: The Orange County MPAH and the City of Newport Beach's General Plan Circulation Element include the extension of 19th Street from its existing eastern terminus in the City of Costa Mesa over the Santa Ana River and connecting to Brookhurst Street at Banning Avenue to the west in the City of Huntington Beach. The 19th Street extension and river crossing is shown on the Orange County MPAH as a Primary (four-lane, divided) Arterial. As such, the *General Plan Buildout* scenarios included in the traffic analyses for both Alternative C and the proposed Project assume the completion of the 19th Street Bridge as shown on the Orange County MPAH, although the bridge is not a part of the Project or any Project alternative.

State Route 55 Freeway Extension: State Route (SR) 55 (Costa Mesa Freeway) provides north-south access in Orange County from SR-91 (Riverside Freeway) to SR-1 (Pacific Coast Highway). From SR-91 to 19th Street, SR-55 is a freeway facility. At 19th Street, the freeway ends and merges with Newport Boulevard, and then continues southward into the City of Newport Beach. The City of Costa Mesa Circulation Element depicts the extension of SR-55 as a freeway between 19th Street and Industrial Way. The Orange County MPAH depicts the freeway portion of SR-55 ending at its current terminus at 19th Street in Costa Mesa. The potential extension of SR-55 and other access alternatives along this corridor have been the subject of study and analysis for a number of years, and a Project Study Report/Project Development Support (PSR/PDS) to study a number of alternatives is planned for the near future. The traffic analyses for Alternative C and the proposed Project assume that the freeway portion of SR-55 ends at its current terminus at 19th Street in Costa Mesa, consistent with the Orange County MPAH assumptions.

General Plan Buildout Without Alternative C

Intersection Levels of Service: The intersections listed below are forecasted to operate at deficient levels (LOS E or F) without Alternative C. All other traffic study area intersections are forecasted to operate at an acceptable LOS (LOS D or better) in both peak hours.

City of Huntington Beach

19. Magnolia Street at Pacific Coast Highway (PM: LOS F)

City of Costa Mesa

34. Newport Boulevard at 19th Street (AM: LOS F, PM: LOS F)

36. Newport Boulevard at Harbor Boulevard (PM: LOS F)

37. Newport Boulevard at 18th Street/Rochester Street (PM: LOS F)

44. Newport Boulevard at 17th Street (PM: LOS E)

48. Irvine Avenue at 17th Street (PM: LOS E)

All other intersections in the cities of Newport Beach, Huntington Beach, and Costa Mesa are forecasted to operate at acceptable levels of service with buildout of their respective General Plans and without Alternative C.

CMP Intersection: The CMP intersection of Newport Boulevard at West Coast Highway is forecasted to operate at LOS D without Alternative C. This intersection would operate at an acceptable LOS (LOS E) based on the CMP significance criteria.

State Highway Intersections: All State Highway intersections are forecasted to operate at acceptable levels of service except for the following intersections which would operate at a deficient LOS D or worse:

City of Huntington Beach

19. Magnolia Street at Pacific Coast Highway (PM: LOS E)

City of Costa Mesa

34. Newport Boulevard and 19th Street (AM: LOS D; PM: LOS D)

36. Newport Boulevard and Harbor Boulevard (PM: LOS D)

37. Newport Boulevard and 18th Street/Rochester Street (PM: LOS D)

44. Newport Boulevard and 17th Street (PM: LOS D)

General Plan Buildout With Alternative C

Intersection Levels of Service: Table 7-13 identifies the peak hour ICU/delay values and the corresponding levels of service for the traffic study area intersections for General Plan buildout with and without Alternative C. In some cases, even with the addition of Alternative C traffic the volume to capacity (V/C) ratio improves when compared to the no development traffic conditions. This is a result of one or more of the following conditions:

- The reassignment of area traffic that would occur when the Bluff Road connection to West Coast Highway through the site is constructed. Bluff Road and North Bluff Road would provide an alternate route for traffic from Newport Beach and Costa Mesa that currently travels on Superior Avenue or Newport Boulevard to reach West Coast Highway.
- The reassignment of trips by the NBTM to alternate routes, due to congestion at other intersections.
- The reassignment of trips by the NBTM that would be served more locally by the future land uses that would otherwise travel farther or in another direction.

**TABLE 7-13
 GENERAL PLAN BUILDOUT WITH ALTERNATIVE C: INTERSECTION OPERATIONS**

Intersection			Control	No Project Development				With Alternative C				Alternative C Impact			
				AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour		Change		Significant?	
				ICU/ Delay	LOS	ICU/ Delay	LOS	ICU/ Delay	LOS	ICU/ Delay	LOS	AM	PM	AM	PM
Newport Beach	1	Monrovia Ave/16 th St	S	0.32	A	0.31	A	0.34	A	0.36	A	0.018	0.044	No	No
	2	Placentia Ave/15 th St	S	0.43	A	0.59	A	0.53	A	0.51	A	0.106	-0.080	No	No
	3	Superior Ave/15 th St	S	0.38	A	0.46	A	0.52	A	0.47	A	0.144	0.009	No	No
	4	Superior Ave/Placentia Ave	S	0.65	B	0.61	B	0.59	A	0.50	A	-0.056	-0.110	No	No
	5	Newport Blvd/Hospital Rd	S	0.67	B	0.79	C	0.64	B	0.75	C	-0.025	-0.033	No	No
	6	Orange St/West Coast Hwy	S	0.77	C	0.80	C	0.76	C	0.74	D	-0.006	-0.069	No	No
	7	Prospect St/West Coast Hwy	S	0.90	D	0.85	D	0.90	D	0.88	D	0.002	0.031	No	No
	8	Superior Ave/West Coast Hwy	S	0.85	D	0.81	D	0.89	D	0.86	D	0.033	0.046	No	No
	9	Newport Blvd/West Coast Hwy	S	0.87	D	0.83	D	0.88	D	0.84	D	0.013	0.011	No	No
	10	Riverside Ave/West Coast Hwy	S	0.72	C	0.87	D	0.73	C	0.88	D	0.012	0.013	No	No
	11	Tustin Ave/West Coast Hwy	S	0.59	A	0.82	D	0.60	A	0.83	D	0.010	0.004	No	No
	12	Dover Dr/West Coast Hwy	S	0.78	C	0.90	D	0.78	C	0.90	D	0.005	0.003	No	No
Huntington Beach	13	Magnolia St/Hamilton Ave	S	0.73	C	0.74	C	0.78	C	0.74	C	0.050	0.004	No	No
	14	Bushard St/Hamilton Ave	S	0.54	A	0.65	B	0.54	A	0.64	B	-0.004	-0.007	No	No
	15	Brookhurst St/Hamilton Ave (Victoria St)	S	0.59	A	0.83	D	0.60	A	0.85	D	0.011	0.020	No	No
	16	Magnolia St/Banning Ave	S	0.59	A	0.49	A	0.66	B	0.48	A	0.069	-0.006	No	No
	17	Bushard St/Banning Ave	S	0.67	B	0.73	C	0.75	C	0.69	B	0.088	-0.037	No	No
	18	Brookhurst St/Banning Ave	S	0.46	A	0.50	A	0.49	A	0.48	A	0.025	-0.024	No	No
	19	Magnolia St/Pacific Coast Hwy	S	0.84	D	1.23	F	0.79	C	1.14	F	-0.052	-0.085	No	No
	20	Brookhurst St/Bushard St	S	0.40	A	0.42	A	0.39	A	0.37	A	-0.012	-0.049	No	No
	21	Brookhurst St/Pacific Coast Hwy	S	0.77	C	0.90	D	0.77	C	0.88	D	0.003	-0.022	No	No

TABLE 7-13 (Continued)
GENERAL PLAN BUILDOUT WITH ALTERNATIVE C: INTERSECTION OPERATIONS

Intersection			Control	No Project Development				With Alternative C				Alternative C Impact			
				AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour		Change		Significant?	
				ICU/ Delay	LOS	ICU/ Delay	LOS	ICU/ Delay	LOS	ICU/ Delay	LOS	AM	PM	AM	PM
Costa Mesa	22	Placentia Ave/Victoria St	S	0.74	C	0.82	D	0.73	C	0.82	D	-0.007	0.000	No	No
	23	Pomona Ave/Victoria St	S	0.69	B	0.82	D	0.71	C	0.84	D	0.013	0.022	No	No
	24	Harbor Blvd/Victoria St	S	0.66	B	0.79	C	0.66	B	0.79	C	0.005	0.000	No	No
	25	Newport Blvd/Victoria St	S	0.48	A	0.43	A	0.48	A	0.44	A	0.000	0.009	No	No
	26	Newport Blvd /Victoria St (22 nd St)	S	0.86	D	0.53	A	0.87	D	0.53	A	0.004	0.002	No	No
	27	Whittier Ave/19 th St	S	0.64	B	0.73	C	0.69	B	0.73	C	0.045	0.004	No	No
	28	Monrovia Ave/19 th St	S	0.56	A	0.51	A	0.58	A	0.50	A	0.024	-0.013	No	No
	29	Placentia Ave/19 th St	S	0.60	A	0.58	A	0.59	A	0.58	A	-0.011	-0.006	No	No
	30	Pomona Ave/19 th St	S	0.57	A	0.73	C	0.58	A	0.75	C	0.012	0.022	No	No
	31	Anaheim Ave/19 th St	S	0.58	A	0.66	B	0.59	A	0.68	B	0.003	0.012	No	No
	32	Park Ave/19 th St	S	0.53	A	0.59	A	0.53	A	0.60	A	0.003	0.006	No	No
	33	Harbor Blvd/19 th St	S	0.50	A	0.63	B	0.50	A	0.63	B	-0.002	0.001	No	No
	34	Newport Blvd/19 th St	S	1.07	F	1.01	F	1.09	F	1.02	F	0.023	0.008	Yes	No
	35	Newport Blvd/Broadway	S	0.69	B	0.85	D	0.70	B	0.88	D	0.006	0.021	No	No
	36	Newport Blvd/Harbor Blvd	S	0.80	C	1.11	F	0.80	C	1.13	F	0.006	0.021	No	Yes
	37	Newport Blvd/18 th St (Rochester St)	S	0.83	D	1.09	F	0.83	D	1.10	F	0.004	0.016	No	Yes
	38	Placentia Ave/18 th St	S	0.52	A	0.54	A	0.54	A	0.55	A	0.027	0.009	No	No
	39	Whittier Ave/17 th St	S	0.18	A	0.23	A	0.41	A	0.44	A	0.231	0.218	No	No
	40	Monrovia Ave/17 th St	S	0.31	A	0.41	A	0.33	A	0.44	A	0.018	0.030	No	No
	41	Placentia Ave/17 th St	S	0.40	A	0.56	A	0.45	A	0.56	A	0.050	0.000	No	No
42	Pomona Ave/17 th St	S	0.44	A	0.51	A	0.51	A	0.52	A	0.062	0.006	No	No	
43	Superior Ave/17 th St	S	0.76	C	0.81	D	0.81	D	0.81	D	0.049	-0.003	No	No	
44	Newport Blvd/17 th St	S	0.80	C	0.92	E	0.83	D	0.93	E	0.027	0.012	No	Yes	
45	Orange Ave/17 th St	S	0.41	A	0.62	B	0.42	A	0.62	B	0.005	0.002	No	No	
46	Santa Ana Ave/17 th St	S	0.43	A	0.51	A	0.43	A	0.50	A	-0.002	-0.010	No	No	

TABLE 7-13 (Continued)
GENERAL PLAN BUILDOUT WITH ALTERNATIVE C: INTERSECTION OPERATIONS

Intersection			Control	No Project Development				With Alternative C				Alternative C Impact			
				AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour		Change		Significant?	
				ICU/ Delay	LOS	ICU/ Delay	LOS	ICU/ Delay	LOS	ICU/ Delay	LOS	AM	PM	AM	PM
Costa Mesa	47	Tustin Ave/17 th St	S	0.45	A	0.58	A	0.44	A	0.58	A	-0.007	0.003	No	No
	48	Irvine Ave/17 th St	S	0.65	B	0.91	E	0.64	B	0.92	E	-0.009	0.003	No	No
	49	Placentia Ave/16 th St	S	0.26	A	0.32	A	0.29	A	0.34	A	0.031	0.020	No	No
	50	Superior Ave/16 th St	S	0.55	A	0.51	A	0.58	A	0.52	A	0.022	0.010	No	No
	51	Newport Blvd/16 th St	S	0.68	B	0.75	C	0.68	B	0.76	C	0.004	0.004	No	No
	52	Bluff Rd/Victoria St	S	0.65	B	0.68	B	0.67	B	0.68	B	0.023	0.003	No	No
On-Site	53	Bluff Rd/19 th St	S	0.50	A	0.58	A	0.53	A	0.58	A	0.031	0.000	No	No
	54	Bluff Rd/17 th St	S	N/A				0.26	A	0.31	A	0.257	0.313	No	No
	55	Bluff Rd/16 th St	U					11.5	B	15.6	C	11.5	15.6	No	No
	56	Bluff Rd/15 th St	S					0.43	A	0.66	B	0.432	0.657	No	No
	57	Bluff Rd/West Coast Hwy	S					0.74	C	0.88	D	0.735	0.881	No	No

ICU: Intersection Capacity Utilization; LOS: level of service; S: Signalized; U: Unsignalized; N/A: not applicable.
Notes: Bold and shaded values indicate intersections operating at LOS E or F.
 Intersection operation is expressed in average seconds of delay per vehicle during the peak hour for unsignalized intersections using the HCM 2000 Methodology and is expressed in volume-to-capacity (v/c) for signalized intersections using the ICU Methodology.
 Negative changes in ICU values may occur as a result of: the reassignment of traffic due to the Bluff Road connection to West Coast Highway; reassignment of trips in the traffic analysis model due to congestion at other intersections, and trips served more locally by the new project that would otherwise travel farther or in another direction
 Source: Kimley-Horn 2011.

The intersections listed below are forecasted to operate at deficient levels (LOS E or F) both without and with Alternative C. All other traffic study area intersections are forecasted to operate at an acceptable LOS (LOS D or better) in both peak hours. The deficient traffic study area intersections are shown on Exhibit 7-6, General Plan Buildout With Alternative C: Deficient Intersections.

City of Huntington Beach

19. Magnolia Street at Pacific Coast Highway (PM: LOS F, Alternative C: no impact)

City of Costa Mesa

34. Newport Boulevard at 19th Street (AM: LOS F, **Alternative C impact: 0.023**; PM: LOS F; Alternative C: no impact)

36. Newport Boulevard at Harbor Boulevard (PM: LOS F, **Alternative C impact: 0.021**)

37. Newport Boulevard at 18th Street/Rochester Street (PM: LOS F, **Alternative C impact: 0.016**)

44. Newport Boulevard at 17th Street (PM: LOS E, **Alternative C impact: 0.012**)

48. Irvine Avenue at 17th Street (PM: LOS E, Alternative C: no impact)

With the extension of North Bluff Road only to just north of 17th Street, two additional intersections would be impacted when compared to the proposed Project. The deletion of the northerly segment of North Bluff Road to 19th Street would result in an increase in both project traffic and areawide traffic using 19th Street and other east-west streets to get to destinations to the west of the site, resulting in increased delay at the intersections along 17th Street, 18th Street, and 19th Street.

CMP Intersection: The intersection of Newport Boulevard at West Coast Highway is the only CMP intersection within the traffic study area. This intersection would continue to operate at an acceptable LOS under this traffic scenario. As with the proposed Project, no significant impact would occur with Alternative C.

State Highways: Table 7-14 summarizes the General Plan Buildout with Alternative C peak hour operations. The following State Highway study intersections would operate at LOS D or worse:

City of Huntington Beach

19. Magnolia Street and Pacific Coast Highway (PM: LOS D)

City of Costa Mesa

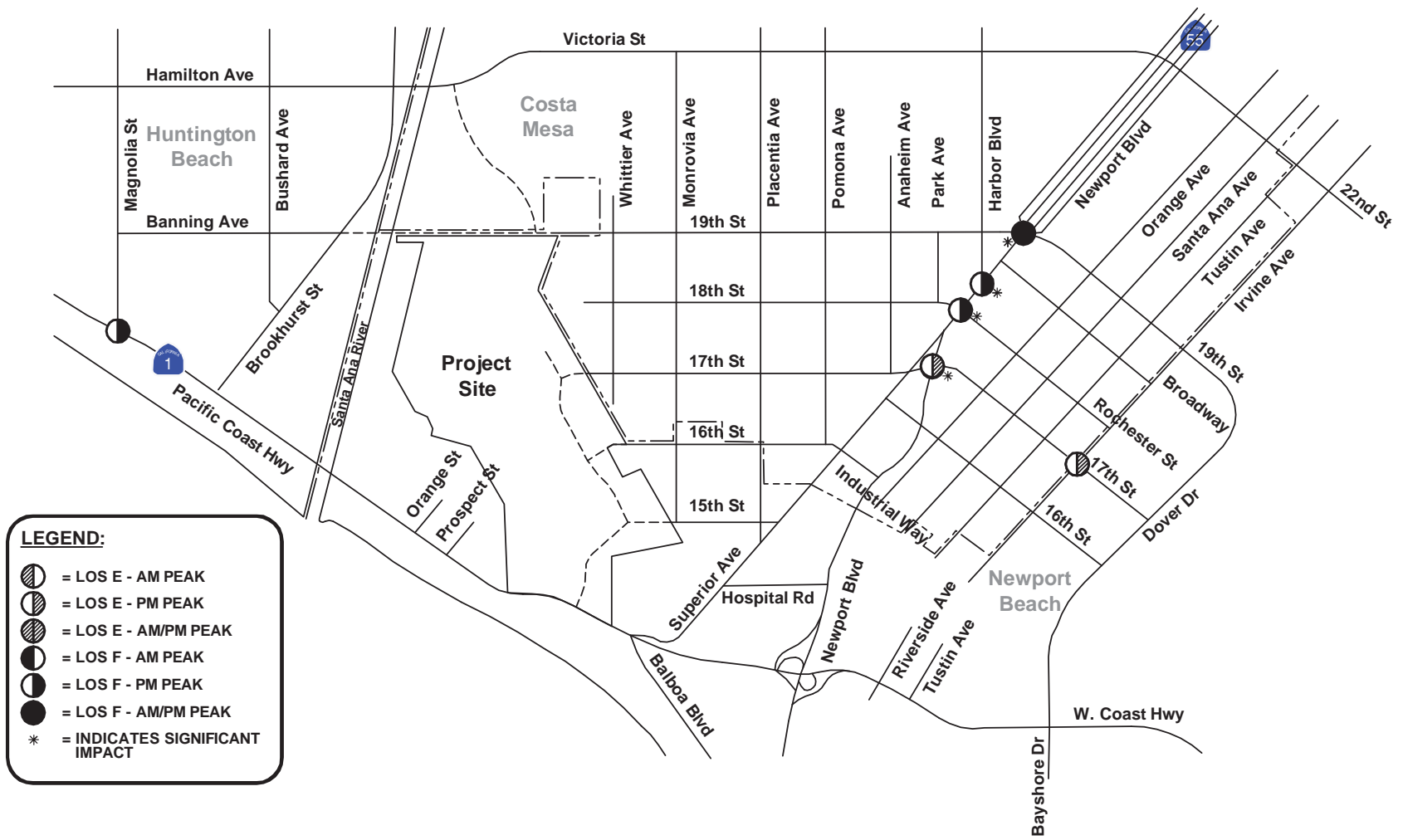
34. Newport Boulevard and 19th Street (AM: LOS D; PM: LOS D)

36. Newport Boulevard and Harbor Boulevard (PM: LOS D)

37. Newport Boulevard and 18th Street/Rochester Street (PM: LOS D)

44. Newport Boulevard and 17th Street (PM: LOS D)

D:/Projects/Newport/J015/Graphics/Ex_DefIntBO.ai



Source: Kimley-Horn and Associates, Inc. 2011

General Plan Buildout with Alternative C: Deficient Intersections

Exhibit 7-6

Newport Banning Ranch EIR



**TABLE 7-14
 GENERAL PLAN BUILDOUT WITH ALTERNATIVE C: STATE HIGHWAY INTERSECTION OPERATIONS**

Intersection		Control	No Project Development				With Alternative C				Alternative C Impact			
			AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour		Change		Significant?	
			Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS	AM	PM	AM	PM
5	Newport Blvd/Hospital Rd	S	17.7	B	23.1	C	16.9	B	22.3	C	-0.8	-0.8	No	No
6	Orange St/West Coast Hwy	S	7.0	A	6.2	A	5.6	A	6.1	A	-1.4	-0.1	No	No
7	Prospect St/West Coast Hwy	S	13.8	B	6.8	A	13.8	B	7.5	A	0.0	0.7	No	No
8	Superior Ave/West Coast Hwy	S	30.3	C	30.0	C	29.9	C	31.2	C	-0.4	1.2	No	No
9	Newport Blvd/West Coast Hwy	S	19.1	B	16.4	B	19.2	B	16.4	B	0.1	0.0	No	No
10	Riverside Ave/West Coast Hwy	S	12.4	B	15.3	B	12.4	B	15.5	B	0.0	0.2	No	No
11	Tustin Ave/West Coast Hwy	S	17.6	B	11.6	B	18.4	B	11.3	B	0.8	-0.3	No	No
12	Dover Dr/West Coast Hwy	S	21.0	C	21.6	C	20.7	C	21.0	C	-0.3	-0.6	No	No
19	Magnolia St/Pacific Coast Hwy	S	24.1	C	62.8	E	22.8	C	44.2	D	-1.3	-18.6	No	No
21	Brookhurst St/Pacific Coast Hwy	S	20.0	B	19.3	B	19.1	B	17.5	B	-0.9	-1.8	No	No
25	Newport Blvd/Victoria St	S	18.4	B	21.0	C	18.4	B	21.3	C	0.0	0.3	No	No
26	Newport Blvd/Victoria St (22 nd St)	S	29.1	C	22.6	C	29.4	C	22.6	C	0.3	0.0	No	No
34	Newport Blvd/19 th St	S	47.2	D	39.4	D	52.1	D	41.6	D	4.9	2.2	No	No
35	Newport Blvd/Broadway	S	4.8	A	7.0	A	4.7	A	7.0	A	-0.1	0.0	No	No
36	Newport Blvd/Harbor Blvd	S	11.4	B	45.1	D	11.4	B	50.0	D	0.0	4.9	No	No
37	Newport Blvd/18 th St (Rochester St)	S	15.4	B	41.9	D	15.2	B	44.9	D	-0.2	3.0	No	No
44	Newport Blvd/17 th St	S	27.8	C	36.5	D	28.9	C	36.9	D	1.1	0.4	No	No
51	Newport Blvd/16 th St	S	9.6	A	8.2	A	10.0	A	8.4	A	0.4	0.2	No	No
57	Bluff Rd/West Coast Hwy	S	0.9	A	1.4	A	12.0	B	23.6	C	11.1	22.2	No	No

LOS: level of service; S: Signalized

Notes: Intersection operation is expressed in average seconds of delay per vehicle during the peak hour for signalized intersections using the HCM 2000 Methodology.

Negative changes in delay values may occur as a result of: the reassignment of traffic due to the Bluff Road connection to West Coast Highway; reassignment of trips in the traffic analysis model due to congestion at other intersections, and trips served more locally by the new project that would otherwise travel farther or in another direction.

Source: Kimley-Horn 2011.

These are the same intersections forecasted to operate at LOS D or worse without implementation of Alternative C. The addition of Alternative C traffic would not cause additional intersections to operate at LOS D or worse, and would not cause the LOS to worsen at any intersection already operating at LOS D or worse. As with the proposed Project, Alternative C would not significantly impact State Highways.

Mitigation Program

MM 4.9-1 Table A identifies the City of Newport Beach (City) transportation improvement mitigation program for the Project as well as the Applicant's fair-share responsibility for the improvements. The resulting levels of service are identified in Table B. In accordance with the requirements of the Traffic Phasing Ordinance, the improvements shall be completed during the 60 months immediately after approval. Approval refers to the receipt of all permits from the City and applicable regulatory agencies. Concept plans depicting these recommended improvements are provided in Appendix F to the Newport Banning Ranch EIR.

MM 4.9-2 Table C identifies the City of Costa Mesa transportation improvement mitigation program proposed for the Project. The resulting levels of service are identified in Table D. The Applicant shall be responsible for using its best efforts to negotiate in good faith to arrive at fair and responsible arrangements to either pay fees and/or construct the required improvements in lieu of the payment of fees to be negotiated with the City of Costa Mesa. The payment of fees and/or the completion of the improvements shall be completed during the 60 months immediately after approval. Approval refers to the receipt of all permits from the City of Newport Beach and applicable regulatory agencies. Concept plans depicting these recommended improvements are provided in Appendix F to the Newport Banning Ranch EIR.

**TABLE A
ALTERNATIVE C
CITY OF NEWPORT BEACH TRAFFIC MITIGATION REQUIREMENTS**

Location		Improvement	Scenario in which Improvements are Needed/Project's Percentage of Fair Share Improvements			
			Existing + Project	2016 TPO	2016 Cumulative	General Plan Buildout
9	Newport Blvd/ West Coast Hwy	Restripe the southbound approach on Newport Blvd to provide one exclusive right-turn lane, one exclusive left-turn lane, and one shared right-/left-turn lane. Note: The proposed improvement is limited to restriping of the southbound approach. No physical changes to the roadway section are anticipated to be necessary and no changes to the right-of-way should be required.	N/A	X (41.2%)	N/A	N/A
N/A: Mitigation measure is not required under this traffic scenario. Source: Kimley-Horn 2011.						

**TABLE B
 ALTERNATIVE C
 CITY OF NEWPORT BEACH TRAFFIC MITIGATION REQUIREMENTS
 LEVEL OF SIGNIFICANCE**

Scenario	Peak Period	Without Mitigation		With Mitigation	
		ICU	LOS	ICU	LOS
Intersection 9: Newport Boulevard/West Coast Highway					
Restripe the southbound approach on Newport Blvd to provide one exclusive right-turn lane, one exclusive left-turn lane, and one shared right-/left-turn lane.					
Existing + Project	N/A	N/A	N/A	N/A	N/A
2016 TPO	AM	0.93	E	0.87	D
2016 Cumulative	AM	0.96	E	0.91	E
General Plan Buildout	N/A	N/A	N/A	N/A	N/A
N/A: not applicable for the traffic scenario. Source: Kimley-Horn 2011.					

**TABLE C
 ALTERNATIVE C
 CITY OF COSTA MESA TRAFFIC MITIGATION REQUIREMENTS**

Location	Improvement	Scenario in which Improvements are Needed			
		Existing + Project	2016 TPO	2016 Cumulative	General Plan Buildout
34	Newport Blvd/ 19 th St Provide a second southbound left-turn on Newport Blvd. Note: The proposed improvement is anticipated to require modifications to the medians and incremental widening of the street on one or both sides of the roadway depending on the final design. Additional right-of-way may be required on one or both sides of Newport Blvd. Direct physical impacts are anticipated to be limited to roadway components including median hardscape and landscape.	N/A	N/A	X	X
36	Newport Blvd/ Harbor Blvd Addition of a fourth southbound through lane on Newport Boulevard. Improve the southbound approach of Newport Boulevard to provide 3 through lanes and 1 shared through/right-turn lane and to improve the south leg to accommodate a fourth receiving lane. Note: Direct physical impacts are anticipated to be limited to roadway components, including median hardscape and landscape improvements, and sidewalk modifications both to the north and south of the intersection. No existing structures or on-street parking would be impacted.	X	X	X	X

TABLE C (Continued)
ALTERNATIVE C
CITY OF COSTA MESA TRAFFIC MITIGATION REQUIREMENTS

Location		Improvement	Scenario in which Improvements are Needed			
			Existing + Project	2016 TPO	2016 Cumulative	General Plan Buildout
37	Newport Blvd/ 18 th St (Rochester St)	Convert the southbound right-turn lane (southbound approach) of Newport Boulevard to provide a through/right-turn lane and to improve the south leg to accommodate a fourth receiving lane.				
		Note: This improvement has been conditioned on the Hoag Health Center project. Direct physical impacts are anticipated to be limited to roadway components, including median hardscape and landscape improvements, and sidewalk modifications both to the north and south of the intersection.	X	X	X	X
42	Pomona Ave/ 17 th St	Install a traffic signal.				
		Note: The improvement would be limited to the installation of the traffic signal. No physical changes to the roadway section are anticipated; no right-of-way is anticipated to be required.	X	X	X	N/A
43	Superior Ave/ 17 th St	Modify the westbound approach to provide 1 left, 1 shared through/left, 1 through, and 1 right-turn lane. This will require split phasing signal operation.				
		Note: The proposed improvement is limited to signal operation modifications. No physical changes to the roadway section are anticipated to be necessary and no changes to the right-of-way should be required.	X	X	X	N/A
44	Newport Blvd/ 17 th St	Add dedicated right-turn lane on the northbound approach.				
		Note: The proposed improvement is anticipated to require modifications to the medians and incremental widening of the street on one or both sides of the roadway depending on the final design. Improvements may also require modifications to the frontage road along the easterly side of Newport Boulevard. Additional right-of-way may be required on one or both sides of Newport Boulevard. Direct physical impacts are anticipated to be limited to roadway components including median hardscape and landscape.	N/A	X	X	X

N/A: Mitigation measure is not required under this traffic scenario.
 Source: Kimley-Horn 2011.

**TABLE D
CITY OF COSTA MESA TRAFFIC MITIGATION REQUIREMENTS
LEVEL OF SIGNIFICANCE**

Scenario	Peak Period	Without Mitigation		With Mitigation	
		ICU	LOS	ICU	LOS
Intersection 34: Newport Boulevard/19th Street					
Assumes the addition of a second southbound left-turn lane on Newport Blvd.					
Existing + Project	N/A	N/A	N/A	N/A	N/A
2016 TPO	N/A	N/A	N/A	N/A	N/A
2016 Cumulative	AM	0.91	E	0.85	D
General Plan Buildout	AM	1.09	F	1.00	E
Intersection 36: Newport Blvd/Harbor Blvd					
Addition of a fourth southbound through lane on Newport Boulevard. Improve the southbound approach of Newport Boulevard to provide 3 through lanes and 1 shared through/right-turn lane and to improve the south leg to accommodate a fourth receiving lane.					
Existing + Project	PM	1.07	F	0.89	D
2016 TPO	PM	1.16	F	0.96	E
2016 Cumulative	PM	1.17	F	0.97	E
General Plan Buildout	PM	1.13	F	0.93	E
Intersection 37: Newport Blvd/18th St (Rochester St)					
Assumes the southbound right-turn lane is converted to a southbound shared through/right lane on Newport Blvd.					
Existing + Project	PM	1.07	F	0.91	E
2016 TPO	PM	1.17	F	0.99	E
2016 Cumulative	PM	1.18	F	1.00	E
General Plan Buildout	PM	1.10	F	0.93	E
Intersection 42: Pomona Ave/17th St					
Install traffic signal					
Existing + Project	PM	39.0	E	0.52	A
2016 TPO	PM	51.3	F	0.55	A
2016 Cumulative	PM	58.4	F	0.57	A
General Plan Buildout	N/A	N/A	N/A	N/A	N/A
Intersection 43: Superior Ave/17th St					
Assumes the westbound approach is converted to provide 1 left, 1 shared/left, 1 through, and 1 dedicated right-turn lane.					
Existing + Project	PM	0.94	E	0.83	D
2016 TPO	PM	1.01	F	0.89	D
2016 Cumulative	PM	1.02	F	0.90	D
General Plan Buildout	N/A	N/A	N/A	N/A	N/A
Intersection 44: Newport Blvd/17th St					
Assumes 1 dedicated northbound right-turn lane.					
Existing + Project	N/A	N/A	N/A	N/A	N/A
2016 TPO	PM	0.93	E	0.90	D
2016 Cumulative	PM	0.93	E	0.90	D
General Plan Buildout	PM	0.93	E	0.89	D
ICU: Intersection Capacity Utilization; LOS: level of service; N/A: not applicable to the traffic scenario; TPO: Traffic Phasing Ordinance.					
Source: Kimley-Horn 2011.					

- MM 4.9-3** Prior to the introduction of combustible materials on the Project site, emergency fire access to the site shall be approved by the City of Newport Beach's Public Works and Fire Departments.
- MM 4.9-4** Prior to the start of grading, the Applicant shall demonstrate to the City of Newport Beach Fire Department that all existing and new access roads surrounding the Project site are designated as fire lanes, and no parking shall be permitted unless the accessway meets minimum width requirements of the Public Works and Fire Departments. Parallel parking on one side may be permitted if the road is a minimum 32 feet in width.
- MM 4.9-5** Prior to the displacement of any private parking spaces associated with improvements to 15th Street, the Applicant shall be responsible for the construction of replacement parking on the Project site within the Community Park site or in a location immediately proximate to the existing parking lot.

Level of Significance After Mitigation

The following summarizes the findings of Thresholds 4.9-1 and 4.9-2 with respect to the analyzed traffic scenarios for Alternative C.

Existing Plus Alternative C

- **City of Newport Beach Intersections:** No City of Newport Beach intersections would be significantly impacted under the Existing Plus Alternative C scenario. This is also true for the proposed Project.
- **City of Costa Mesa Intersections:** Alternative C would significantly impact four intersections in Costa Mesa, whereas the proposed Project would significantly impact three intersections in Costa Mesa. As previously noted, this traffic scenario does not accurately reflect the timing for development of Alternative C or the proposed Project.
- **Congestion Management Plan Intersection:** The CMP intersection at Newport Boulevard and West Coast Highway is forecasted to operate at an acceptable level of service for both Alternative C and the proposed Project.

Year 2016 With Alternative C TPO Analysis

- **City of Newport Beach Intersections:** Alternative C and the proposed Project would significantly impact the intersection of Newport Boulevard at West Coast Highway in Newport Beach. The impact can be mitigated to a level considered less than significant with the implementation of the Mitigation Program.
- **City of Costa Mesa Intersections:** Alternative C would significantly impact five intersections; the proposed Project would significantly impact the same five intersections as Alternative C, in addition to the intersections of Monrovia Avenue at 19th Street and Newport Boulevard at 19th Street. Implementation of the Mitigation Program would mitigate impacts to a level considered less than significant. However, the City of Newport Beach cannot impose mitigation on another jurisdiction. Therefore, if the Applicant is unable to reach an agreement with the City of Costa Mesa that would ensure that Project impacts occurring in Costa Mesa would be mitigated concurrent with or preceding the impact, for purposes of this EIR, the impacts to be mitigated by the improvements would remain significant and unavoidable, and impacts would be potentially greater than the proposed Project.

Year 2016 Cumulative With Alternative C

- **City of Newport Beach Intersections:** Both Alternative C and the proposed Project would significantly impact the intersection of Newport Boulevard at West Coast Highway in Newport Beach. The impact can be mitigated to a level considered less than significant with the implementation of the Mitigation Program.
- **City of Costa Mesa Intersections.** Alternative C would significantly impact six intersections; the proposed Project would significantly impact seven intersections: Monrovia Avenue at 19th Street and the same six intersections as Alternative C. Implementation of the Mitigation Program would mitigate the impacts to a level considered less than significant. However, the City of Newport Beach cannot impose mitigation on another jurisdiction. Therefore, for purposes of this EIR, the impacts to be mitigated by the improvements would remain significant and unavoidable, and impacts associated with Alternative C would be potentially greater than the proposed Project.
- **Congestion Management Plan Intersection:** Neither Alternative C nor the proposed Project would cause the intersection of Newport Boulevard at West Coast Highway to fall below the CMP LOS standards. Therefore, no significant impacts would occur.
- **State Highway Intersections:** Both Alternative C and the Project would cause the Newport Boulevard at 17th Street intersection to operate at LOS D, which is considered a deficient level of service..
- **Freeway Mainline Segments:** Neither Alternative C nor the Project would significantly impact any freeway segments.

General Plan Buildout

- **City of Newport Beach Intersections:** No Newport Beach intersections would be significantly impacted by Alternative C or the proposed Project.
- **City of Costa Mesa Intersections:** Alternative C would significantly impact four intersections, and the proposed Project would significantly impact two of the four intersections. Implementation of the Mitigation Program would mitigate impacts to a level considered less than significant. However, the City of Newport Beach cannot impose mitigation on another jurisdiction. Therefore, for purposes of this EIR, the impacts to be mitigated by the improvements would remain significant and unavoidable, and impacts associated with Alternative C would be potentially greater than the proposed Project.
- **Congestion Management Plan Intersection:** Neither Alternative C nor the proposed Project would cause the intersection of Newport Boulevard at West Coast Highway to fall below the CMP LOS standards. Therefore, no significant impact would occur.
- **State Highway Intersections:** Neither Alternative C nor the proposed Project would cause any State intersections to operate at a deficient level of service. No significant impact would occur.

As with the proposed Project, Alternative C would not substantially increase hazards due to a design feature, incompatible land uses, or inadequate emergency access (Threshold 4.9-3). All land uses would be required to provide adequate on-site parking; no parking impacts would occur (Threshold 4.9-4). With respect to Threshold 4.9-5, which addresses consistency with transportation-related plans, policies, and regulations, both the proposed Project and Alternative C are considered consistent with the intent of the transportation-related goals and policies of SCAG, the *City of Newport Beach General Plan*, and the California Coastal Act.

The Mitigation Program outlined in Section 4.9.15 would also be applicable to Alternative C. As with the proposed Project, Alternative C's impacts on intersections within the City of Newport Beach can be mitigated to a level considered less than significant. However, all measures in the City of Costa Mesa would be subject to the approval of Costa Mesa and cannot be enforced by the City of Newport Beach. Therefore, for both the proposed Project and Alternative C, for purposes of this EIR, these impacts in the City of Costa Mesa would be significant and unavoidable.

Air Quality

Alternative C construction emissions could be slightly reduced due to the elimination of a portion of North Bluff Road. However, in terms of daily activity and associated emissions, Alternative C would be essentially the same as the proposed Project. As described for the proposed Project, without mitigation, regional (mass) emissions of NO_x are forecasted to exceed applicable thresholds in some construction years. Mitigation would reduce the emissions to less than significant. However, the availability of sufficient Tier 4 diesel engine construction equipment cannot be assured; thus the impact is potentially significant and unavoidable (Threshold 4.10-2). Localized concentrations of CO, nitroxiđen dioxide (NO₂), large particulate matter (PM₁₀), and fine particulate matter (PM_{2.5}) due to construction activities would not exceed the applicable thresholds (Threshold 4.10-2).

As with the proposed Project, the cancer risk, the cancer burden, the chronic hazard risk, and the acute hazard risk from TAC emissions with Alternative C to both off-site and on-site receptors would be less than significant (Threshold 4.10-4).

Alternative C would eliminate a potential north-south connection from areas within and to the south of the Project site to areas to the north of the site. Therefore, it may be assumed that there would be an increase in vehicle miles traveled (VMT) when compared to the proposed Project and, accordingly, a comparative increase in vehicle emissions. The increase would not be substantial when compared to total Project emissions, and the long-term emissions impact conclusions would be the same as for the proposed Project. Beyond 2020, pollutant emissions of VOCs and CO would exceed SCAQMD CEQA significance thresholds, principally due to vehicle operations. The impacts would be significant and unavoidable (Threshold 4.10-2). Long-term emissions would be cumulatively significant (Threshold 4.10-3).

Localized CO concentrations at congested intersections, TAC emissions from the site, and future on-site TAC concentrations would not exceed ambient air quality standards or CEQA significance thresholds and would not expose persons to substantial pollutant concentrations. Impacts would be less than significant (Thresholds 4.10-2 and 4.10-4). Potential odor impacts would be less than significant (Threshold 4.10-5). Alternative C and the proposed Project would have the same level of impact for each of these thresholds.

Proposed development would not exceed the assumptions used to develop the SCAQMD AQMPs, and Alternative C would not conflict with or obstruct implementation of the SCAQMD AQMPs (Threshold 4.10-1) or other applicable policies of agencies with jurisdiction over the Project (Threshold 4.10-6).

Greenhouse Gas Emissions

Alternative C construction GHG emissions would be incrementally less than for the proposed Project, because there would be no construction of North Bluff Road north of 17th Street.

Long-term GHG emissions would be slightly greater with Alternative C compared to the proposed Project. The increase in GHG would be associated with the small increase in VMT when compared to the proposed Project because this Alternative would eliminate the full extension of North Bluff Road, causing drivers to take longer routes. Therefore, it may be assumed that there would be an increase in vehicle GHG emissions. As with the proposed Project, it is estimated that the Alternative C long-term GHG emissions would exceed the 6,000 MTCO₂e/yr significance threshold and would be a cumulatively significant impact (Threshold 4.11-1). Without the construction of North Bluff Road between 17th Street and 19th Street, the GHG emission impacts of this Alternative would be slightly greater than the proposed Project.

Neither the proposed Project nor Alternative C would conflict with applicable plans, policies, or regulations adopted for the purpose of reducing GHG emissions and there would be no impacts (Threshold 4.11-2).

Noise

Construction noise impacts for Alternative C would be similar to those for the proposed Project, except that there would be less impact to receptors near and north of 17th Street because North Bluff Road north of 17th Street would not be built. There would be periodic, temporary, unavoidable significant noise impacts that would cease upon completion of construction activities (Threshold 4.12-2). Vibration impacts would be the same as for the proposed Project (Threshold 4.12-3).

Cumulative noise levels on existing roadways for Alternative C would be slightly less than for the proposed Project on roadways to the north and northeast of the Project site and slightly greater on roadways to the east of the Project site because of the redistribution of traffic. The noise level changes would be due to a combination of cumulative growth, a redistribution of traffic resulting from the building of the Alternative C roads, and new trips generated by the development of residential, commercial, and park uses. There would be a significant noise impact on 17th Street west of Monrovia Avenue, the same as is forecasted for the proposed Project. As with the proposed Project, mitigation is proposed but, because these impacts would occur in the City of Costa Mesa and because the City of Newport Beach cannot dictate mitigation outside its jurisdiction, it cannot be certain the mitigation would be implemented (Thresholds 4.12-1 and 4.12-4). There would be a significant noise impact on 15th Street, west of Monrovia Avenue in the Alternative C's *Existing Plus Project* and *2016 with Project* scenarios, but not in the *General Plan Buildout* scenario, which is the same as is forecasted for the proposed Project. Although there would be no change in total trip generation, there would be an increase in traffic volumes on 15th Street due to a redistribution of traffic; thus the impact would be slightly greater than the proposed Project. As with the proposed Project, the impact can be mitigated to a less than significant level.

With Alternative C at General Plan buildout, future CNEL at the Newport Crest residences facing the Project site would increase from approximately 9 to 15 dBA above existing noise levels, which would be a significant noise impact. The noise increases would be approximately 0.4 dBA CNEL greater than with the proposed Project because traffic volumes on Bluff Road would be approximately 10 percent greater than with the proposed Project. The increase in traffic volumes is because the direct connection to 19th Street provided by North Bluff Road would not be built. This would require vehicles to remain on Bluff Road and use an alternative north-south route. As a result, there would be an increase in the number of vehicles on Bluff Road. Noise-abatement measures could reduce noise to a compatible level as defined for new development by the General Plan, but the increase would still exceed the significance

criterion. Noise-abatement measures—including the construction of noise barriers to reduce exterior noise impacts and upgrades for windows on the facades of homes facing Bluff Road to reduce interior noise impacts—could reduce noise to a compatible level, as defined for new development by the General Plan. However, as with the proposed Project, from a CEQA perspective, the interior noise impacts on the first row of units in Newport Crest facing Newport Banning Ranch would remain a significant and unavoidable impact because the City of Newport Beach does not have the authority to mandate the implementation of mitigation on property that is not on the Project site. Future noise levels at the California Seabreeze and Parkview Circle residences would be reduced negligibly because North Bluff Road would not extend north of 17th Street. Future noise levels at the Carden Hall School would increase by less than 1 dBA; the impact would be less than significant (Thresholds 4.12-1 and 4.12-4).

The potential for traffic noise impacts to proposed land uses would be the same or very similar to those forecasted for the proposed Project. Noise land use compatibility would be the same as for the proposed Project. Mitigation would be required to reduce traffic noise to proposed residential uses adjacent to roadways to achieve the compatible noise levels required by the General Plan and the *California Code of Regulations* (Threshold 4.12-1).

Noise impacts from stationary sources associated with new residential and commercial development would be the same with Alternative C as with the proposed Project (Thresholds 4.12-1 and 4.12-4). Noise impacts from the possible drilling of new wells in the consolidated oilfield would be the same as for the proposed Project (Threshold 4.12-2). The Project site is not within an airport land use plan or near a private airstrip; there would be no impacts from excessive aircraft noise levels (Thresholds 4.12-5 and 4.12-6). As with the proposed Project, Alternative C would be consistent with the goals and policies of the City of Newport Beach General Plan related to noise (Threshold 4.12-7).

Cultural and Paleontological Resources

Alternative C would develop the site with residential, commercial, resort inn, recreational, and open space uses without the construction of North Bluff Road between 17th Street and 19th Street. Development under this Alternative would not impact any known historical resources (Threshold 4.13-1); however, grading and excavation of the site would have the potential to impact unknown historical resources, same as the proposed Project.

As with the proposed Project, Alternative C would involve oil consolidation operations and development of the site. Therefore, there is the potential for discovery of previously unidentified archaeological (Threshold 4.13-2) or paleontological resources (Threshold 4.13-3), same as the proposed Project. Alternative C would impact known archaeological resources. More specifically, three archaeological sites (CA-ORA-906, CA-ORA-839 and CA-ORA-844B) are deemed eligible for listing on the California Register of Historical Resources (CRHR) and National Register of Historic Places (NRHP). Disturbance activities could also impact unknown resources. It should be noted that, by not developing the northern portion of Bluff Road, this Alternative would help preserve CA-ORA-906 and not completely destroy the site, but oil infrastructure removal could impact the site. This site also would be directly impacted by the proposed Project.

There is no indication that burials are present on the site; however, as with the proposed Project, under this Alternative there is potential for disturbance of human remains, including those interred outside of formal cemeteries (Threshold 4.13-4). With the applicable mitigation, impacts would be less than significant.

Threshold 4.13-5 pertains to consistency with any applicable plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Alternative C would not conflict with any goals or policies of the *City of Newport Beach General Plan* or the Coastal Act related to historic, archaeological, and paleontological resources, same as the proposed Project. To mitigate for potentially significant impacts, this Alternative would be required to comply with the Mitigation Program set forth in the EIR. This Mitigation Program requires compliance with standard practices for the identification, evaluation, and preservation of cultural resources remains and/or the recovery of these remains in a manner that preserves the scientific and historical value of the resource. This Alternative would be consistent with provisions of the General Plan. For this threshold, this Alternative and the proposed Project would have no impacts.

Public Services and Facilities

The public services and facilities evaluated in the EIR include the following: fire protection, police protection, schools, library services, and solid waste. Alternative C assumes the same land uses and same development plan as the proposed Project without the construction of North Bluff Road between 17th Street and 19th Street. As a result, Alternative C would have the same residential population as the proposed Project, and would have the same level of impact on public services and facilities.

With Alternative C, potential impacts to fire protection service (Threshold 4.14-1) would remain the same as the proposed Project and mitigation measures would reduce the impacts to less than significant. Elimination of the northern extension of North Bluff Road would not substantially alter emergency response times because the primary response would be from City of Newport Beach facilities, which are located south of the Project site. As with the proposed Project, the majority of the development proposed with this Alternative can be adequately served through the use of existing City of Newport Beach fire and emergency medical services. As with the proposed Project, Site Planning Area 12b, the northerly block of Site Planning Area 10a, and the northerly block of Site Planning Area 10b cannot be served by Station Number 2 within the established response time, which is a significant impact. As with the proposed Project, implementation of the Mitigation Program would be required and potential impacts to fire protection service associated with Alternative C would be less than significant (Threshold 4.14-1).

Potential impacts to police protection service (Threshold 4.14-3) associated with Alternative C would be the same as with the proposed Project. Construction-related impacts such as trespassing, theft, and vandalism would require police protection services; however, as with the proposed Project, construction-related impacts would be less than significant. Operational impacts associated with Alternative C, as with the proposed Project, could increase the demand for police protection services; however, this demand would not require the construction of new facilities, nor would it require the expansion of existing facilities that would result in physical environmental impacts. Access to the site by the Newport Beach Police Department would not be adversely impacted if the segment of North Bluff Road between 17th Street and 19th Street is not constructed. Police protection services can be provided for Alternative C, as for the proposed Project, without significantly impacting existing and planned development within the City. Implementation of the Mitigation Program, including SC 4.14-1 (building and site safety design recommendations) and SC 4.14-2 (site security), would ensure that adequate police protection services can be provided to the site. As with the proposed Project, the impact of Alternative C on police protection services would be less than significant.

Potential impacts to schools (Threshold 4.14-5) associated with Alternative C would be the same as with the proposed Project. The Project site is located within the Newport-Mesa Unified School District (School District). Both the proposed Project and Alternative C would generate approximately 161 elementary school students, approximately 42 middle school students, and approximately 65 high school students. These students would attend schools within the School District, which has capacity to accommodate the expected number of students. Access to the schools that would be attended by children in the Newport Banning Ranch development would not be adversely impacted by not providing the segment of North Bluff Road between 17th Street and 19th Street. Implementation of the Mitigation Program, including SC 4.14-3 (payment of developer fees) and SC 4.14-4 (application of General Obligation bond tax rate), would preclude significant impacts to the School District associated with Alternative C. As with the proposed Project, no significant impacts are anticipated with Alternative C.

Potential impacts to library service (Threshold 4.14-7) associated with Alternative C would remain the same as the proposed Project. Implementation of the Mitigation Program, including SC 4.14-5 (payment of required Property Excise Tax to the City of Newport Beach) would further reduce potential impacts to library services. As with the proposed Project, Alternative C would not create a need for new or expanded library facilities; therefore, there would be no impact to library services.

Potential impacts to solid waste service (Threshold 4.14-9) associated with Alternative C would remain the same as with the proposed Project. Both the proposed Project and Alternative C would generate an estimated 19,456.3 pounds of solid waste per day or approximately 3,540.5 tons of solid waste annually. As with the proposed Project, less than significant impacts to solid waste would result from implementation of Alternative C.

Thresholds 4.14-2, 4.14-4, 4.14-6, 4.14-8, and 4.14-10 pertain to consistency with any applicable plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. As with the proposed Project, Alternative C would be consistent with applicable policies

Utilities

The Utilities evaluated in the EIR include the following: Water, Wastewater Facilities, and Energy (Electricity and Natural Gas). Alternative C assumes the same land uses and same development plan as the proposed Project without the construction of North Bluff Road between 17th Street and 19th Street. As a result, Alternative C would have the same residential population as the proposed Project, and would have the same level of impact on public services and facilities.

As with the proposed Project, Alternative C would require the construction of new water lines and connections (Threshold 4.15-1) both on site and off site. The impacts of the construction of these facilities have been assumed in the impact analysis of this Alternative. Regarding water supply (Threshold 4.15-2), based on the Water Supply Assessment, the City has indicated that a sufficient supply of water is available during average, single-dry, and multiple-dry years that would meet the anticipated water demand associated with the proposed Project, in addition to the water demands of existing and planned future uses through year 2030. Because Alternative C assumes the same land uses as the proposed Project, it can be assumed that there would be sufficient water supply to serve Alternative C. As with the proposed Project, less than significant impacts to water supply would result with Alternative C.

As with the proposed Project, wastewater flows from the Project site for Alternative C would be subject to treatment according to treatment requirements set forth by the RWQCB (Threshold 4.15-4). Project flows would not exceed the established wastewater treatment requirements for Alternative C.

With Alternative C, an increase in wastewater would occur with discharge flowing to the Bitter Point Pump Station. As with the proposed Project, there is a potential City-operated sewer lift station would be constructed in the event that a gravity system cannot be incorporated (Threshold 4.15-5). As with the proposed Project, Alternative C would require the construction of new wastewater pipelines on site and one off-site connection on 16th Street; however, the off-site connection would occur within existing street right-of-way and would not result in environmental effects beyond those addressed as part of this Alternative. As with the proposed Project, less than significant impacts to wastewater would result with Alternative C.

Alternative C would result in an increase in demand for electrical service and natural gas service. As with the proposed Project, Alternative C is designed to avoid inefficient, wasteful, and unnecessary energy consumption and to otherwise reduce energy consumption as compared to standard construction practices. The electrical and natural gas utility providers have indicated their ability to serve the proposed Project; therefore, it is assumed these service providers would be able to adequately serve Alternative C. As with the proposed Project, there would be less than significant impacts to additional demand for electricity and natural gas services and infrastructure with implementation of Alternative C. Physical impacts related to installation and/or relocation of necessary infrastructure include air quality and noise impacts. Implementation of the Mitigation Program, including construction noise and short-term air quality mitigation would reduce these physical impacts to a less than significant level. As with the proposed Project, no significant impacts are anticipated with Alternative C (Threshold 4.15-7).

Thresholds 4.15-3, 4.15-6, and 4.15-8 pertain to consistency with any applicable plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. As with the proposed Project, Alternative C would be consistent with applicable policies.

Conclusion

Alternative C is the same as the proposed Project, except that the extension of North Bluff Road between 17th Street and 19th Street would not be constructed. As a result, the nature of the impacts are the same as those discussed in Sections 4.1 through 4.15 of this EIR, with incremental decreases in impacts associated with the amount of grading and disturbance to native habitat and biological resources, and increased (qualitative and quantitative) opportunities for habitat restoration. There is also a reduction in the amount of construction air emissions and impacts to cultural resources disturbed. This Alternative would also have the benefit of not having the road extension bisecting the open space area. However, Alternative C would result in additional traffic using Bluff Road, which would result in an incremental increase in traffic noise along this segment of roadway. In addition, this alternative would increase the number of intersections that have project-related impacts. Additionally, should it be determined at some point in the future that the connection of North Bluff Road to 19th Street is required, the City or other entity would be responsible for implementing the improvement. This would not be an expense borne by the developer. Subsequent CEQA analysis would likely be required and permitting may be more difficult because the roadway would bisect lands that had been remediated and were functioning as open space.

Significant and Unavoidable Impacts

Alternative C would not eliminate or substantially lessen any of the significant and unavoidable impacts identified with the proposed Project. The following significant and unavoidable impacts would occur with Alternative C:

The following is a summary of the significant, unavoidable impacts associated with Alternative C:

- There would be land use incompatibility with respect to night illumination associated with the Community Park and long-term noise impacts on those Newport Crest residences immediately contiguous to the Project site. In addition, there would be a potential long-range noise impacts for residents on 17th Street west of Monrovia Avenue. For noise, though mitigation is proposed, noise impacts would remain significant if the residents of Newport Crest elect not to implement the mitigation measures to reduce the increased interior noise levels and if the City of Costa Mesa does not implement the recommended measure of resurfacing the street with rubberized asphalt (Threshold 4.1-1).
- Alternative C would include a “dark sky” lighting regulations in the NBR-PC that would apply to businesses (e.g., resort inn and neighborhood commercial uses) and Homeowners Association-owned and operated land uses within 100 feet of the Open Space Preserve. However, Alternative C would introduce nighttime lighting into a currently unlit area. The Community Park is anticipated to have night lighting of active sports fields, which could result in light spillover onto adjacent properties. The night lighting impacts are considered significant and unavoidable. The City of Newport Beach General Plan Final EIR found that the introduction of new sources of lighting associated with development of the site would be considered significant and unavoidable. In certifying the General Plan Final EIR and approving the General Plan project, the City Council approved a Statement of Overriding Considerations, which notes that there are specific economic, social, and other public benefits that outweigh the significant and unavoidable impacts associated with the General Plan project (Threshold 4.2-3).
- Alternative C would have impacts on intersections in the City of Costa Mesa. Implementation of MM 4.9-2 would mitigate the impacts to a level considered less than significant. However, the City of Newport Beach cannot impose mitigation on another jurisdiction. Therefore, if the Applicant is unable to reach an agreement with the City of Costa Mesa that would ensure that Project impacts occurring in Costa Mesa would be mitigated concurrent with or preceding the impact, for purposes of this EIR, the impacts to be mitigated by the improvements would remain significant and unavoidable. Pursuant to Threshold 4.9-2, the following impacts were identified with the various traffic scenarios evaluated:
 - *Existing Plus Alternative C*: Alternative C would significantly impact four intersections in Costa Mesa, whereas the proposed Project would significantly impact three intersections in Costa Mesa.
 - *Year 2016 With Alternative C Transportation Phasing Ordinance (TPO)*. Alternative C would significantly impact five intersections, compared to seven for the proposed Project.
 - *Year 2016 Cumulative With Alternative C*. Alternative C would significantly impact six intersections; the proposed Project would significantly impact seven intersections:

- *General Plan Buildout with Alternative C.* Alternative C would significantly impact four intersections compared to the proposed Project would significantly impact two intersections
- Without mitigation, regional (mass) emissions of nitrogen oxides (NO_x) are forecasted to exceed applicable thresholds in some construction years. Though MM 4.10-1 would reduce the emissions to a less than significant level, the availability of sufficient Tier 4 diesel engine construction equipment cannot be assured. Therefore, for purposes of this EIR, the impacts are found to be significant and unavoidable impact (Threshold 4.10-2).
- Long-term operational emissions of criteria pollutants would not exceed the SCAQMD mass emissions thresholds from initial occupancy through 2020. However, as Alternative C development continues beyond 2020, emissions of volatile organic compounds (VOC) and carbon monoxide (CO) would exceed the significance thresholds, principally due to vehicle operations. Therefore, the impacts remain significant and unavoidable (Threshold 4.10-2).
- Alternative C would have cumulatively considerable contributions to regional pollutant concentrations of ozone (O₃) (Threshold 4.10-3).
- Alternative C would emit quantities of greenhouse gases (GHGs) that would exceed the City's 6,000 metric tons of carbon dioxide equivalent per year (MTCO₂e/yr) significance threshold. Development associated with Alternative C would make a cumulatively considerable contribution to the global GHG inventory affecting global climate change (Threshold 4.11-1).
- For the *Existing Plus Project, 2016 with Project, and General Plan Buildout* scenarios, the increased traffic volumes on 17th Street west of Monrovia Avenue would expose sensitive receptors to noise level increases in excess of the City of Newport Beach's standards for changes to the ambient noise levels. At buildout, noise levels would also exceed significance thresholds in the City of Costa Mesa. MM 4.12-5 requires the Applicant to provide funds to the City of Costa Mesa to resurface the street with rubberized asphalt; however, the City of Newport Beach has no ability to ensuring that the mitigation would be implemented. Therefore, the forecasted impact to residents of 17th Street west of Monrovia is considered significant and unavoidable (Threshold 4.12-2).
- For portions of the Newport Crest development, there would be a significant increase in the ambient noise level due to the projected traffic volumes in the buildout condition of Alternative C. MM 4.12-6 would reduce impacts to levels within the "Clearly Compatible" or "Normally Compatible" classifications but would remain above the 5 dBA significance criterion in the General Plan. MM 4.12-7 would provide interior noise attenuation but because the City of Newport Beach does not have the authority to mandate the implementation of mitigation on private property that is not on the Project site, the impact would be significant and unavoidable (Thresholds 4.12-4).
- Use of construction equipment would result in a substantial temporary increase in ambient noise levels to nearby noise-sensitive receptors in the vicinity of the Project. Due to the low existing ambient noise levels, the proximity of the noise-sensitive receptors, and duration of construction activities, the temporary noise increases would be significant and unavoidable (Threshold 4.12-2).

Feasibility and Ability to Meet Project Objectives

Alternative C is a potentially feasible alternative. It is able to meet the Project objectives as effectively as the proposed Project, with the exception of Objective 7. This objective reads: "Provide for roadway improvements to improve and enhance regional circulation, minimize impacts of Project development on the existing circulation system, and enhance public access while not developing more roadways than are needed for adequate regional circulation and coastal access." Alternative C does not operate as effectively as the proposed Project in meeting this objective because it results in an additional intersection operating at a deficient level of service. Additionally, it does not construct a segment of the local and regional transportation network.

7.5.4 ALTERNATIVE D: REDUCED DEVELOPMENT AND REDUCED DEVELOPMENT AREA (NO RESORT INN AND 1,200 UNITS)

Description of the Alternative

Alternative D was developed to evaluate whether the Project objectives could be met, while decreasing the Project impacts by reducing the number of residential and hotel units and the overall Project footprint. This Alternative would result in a minimal reduction in the number of acres impacted by the development and, in that respect, would reduce impacts (Table 7-1 provides a comparison of the acres for each alternative). However, it would not totally avoid the significant impacts associated with the proposed Project.

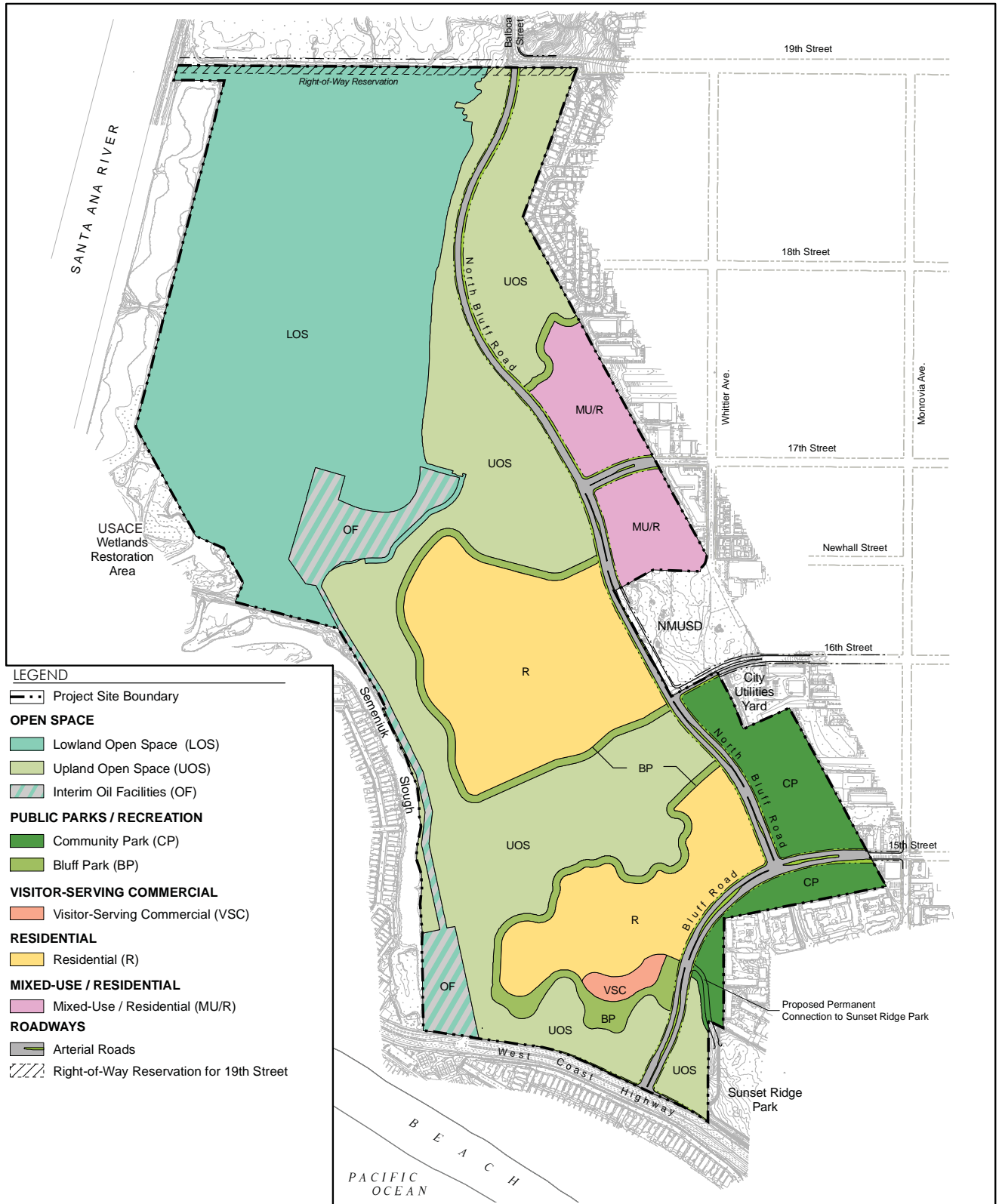
Alternative D assumes both a reduction in the amount of development that would occur on the Project site and a reduction in the acreage associated with that development. The same roadway system is proposed. When compared to the proposed Project, Alternative D would allow for 1,200 du, including an affordable housing component per the⁶; 60,000 sf of neighborhood commercial uses (compared to 75,000 sf); 15,000 sf of visitor-serving commercial uses (in place of a 75-room resort inn); approximately 39.1 acres of parks including a 24.8-gross-acre Community Park (compared to approximately 51 total acres of parklands for the proposed Project).⁷ The 15,000 sf of visitor-serving commercial use would be predominately restaurant uses. Alternative D does not include a Nature Center or interpretive trails. Similarly, the pedestrian bridge and the internal trail network would not be implemented as part of this Alternative. Open space uses would increase from 252.3 gross acres to 269.1 gross acres. The development area (residential, commercial, and visitor-serving uses) would decrease from 97.4 gross acres to 92.9 gross acres. As with the proposed Project, the Community Park would be constructed by the Applicant as part of this Alternative; it would be offered for dedication to the City; and, upon acceptance, it would be maintained by the City.

Alternative D would require the same discretionary actions as noted for the proposed Project. It is assumed that a Mitigation Program similar to what is proposed for the Project would be required for Alternative D. Though the nature of the mitigation would be the same, for some topical areas, such as biological resources, the mitigation requirements may be slightly less because the number of acres of habitat impacted would be less.

Exhibit 7-7, Alternative D: Reduced Development and Reduced Development Area, depicts the land use plan for Alternative D. Table 7-15 identifies the land uses and acreage associated with the allowable land uses. The exhibit reflects the land uses that would be allowed, which is not the same as the limits of land disturbance. Additional impacts would be associated with the oilfield remediation, fuel modification, and any trails that ultimately are provided by other parties in open space area.

⁶ The number of required affordable units would be 15 percent of the total number of approved units.

⁷ Alternative D assumes compliance with Quimby Act, which would require approximately 15 acres of parkland based on 5 acres of park per 1,000 persons; the City assumes 2.19 persons per dwelling unit.



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Source: FORMA 2011

Alternative D: Reduced Footprint and 1,200 Dwelling Units

Exhibit 7-7

Newport Banning Ranch EIR



Bonterra
CONSULTING

**TABLE 7-15
ALTERNATIVE D STATISTICAL SUMMARY**

Land Use District		Gross Acres ^a	Planned Dwelling Units	Maximum Permitted Commercial sf	Maximum Permitted Overnight Accommodations
Open Space					
LOS	Lowland Open Space ^b	130.6	–	–	–
UOS	Upland Open Space ^b	122.0			
OF	Interim Oil Facilities ^c	16.5	–	–	–
<i>Subtotal Open Space</i>		<i>269.1</i>	<i>–</i>	<i>–</i>	<i>–</i>
Public Parks/Recreation					
CP	Community Park	24.8	–	–	–
BP	Bluff Park ^d	14.3	–	–	–
<i>Subtotal Public Parks/Recreation</i>		<i>39.1</i>	<i>–</i>	<i>–</i>	<i>–</i>
Visitor-Serving Commercial					
VSC	Visitor-Serving Commercial ^e	2.0	–	15,000	–
<i>Subtotal Visitor-Serving Commercial</i>		<i>2.0</i>	<i>–</i>	<i>15,000</i>	<i>–</i>
Residential					
R	Residential (up to 10 du/ac) ^e	70.0	645	–	–
<i>Subtotal Residential</i>		<i>70.0</i>	<i>645</i>	<i>–</i>	<i>–</i>
Mixed-Use/Residential					
MU/R	Mixed-Use/Residential (up to 35 du/ac) ^e	20.9	555	60,000	–
<i>Subtotal Mixed-Use/Residential</i>		<i>20.9</i>	<i>555</i>	<i>60,000</i>	<i>0</i>
Total Project		401.1	1,200	75,000	0
sf: square footage; du/ac: dwelling unit per acre					
^a Gross acres are measured to centerlines of all public roads where such roads are shown on the plan. Gross acres are computed using geographic information system (GIS) technology with accuracy to 10 decimal places. Acres are shown in this table to 1 decimal place.					
^b The Right-of-Way Reservation for the 19 th Street Extension contains approximately 3.1 acres.					
^c The Interim Oil Facilities (Open Space Land Use) District includes: (1) the existing oil operations site near West Coast Highway; (2) the oil consolidation site near the middle of the Lowland; and (3) an oil access road (non-exclusive easement) connecting the two working sites.					
^d Gross acres for the Bluff Park District may include fuel management zones and landscape focal points and greens.					
^e Gross acres for the Residential District, the Visitor-Serving Commercial District, and the Mixed-Use/Residential District may include fuel management zones, privately owned and maintained parks and recreational facilities, and landscape focal points and greens.					
Source: FORMA 2011.					

Comparative Analysis of Environmental Impacts

Land Use and Related Planning Programs

Alternative D would result in approximately 13 percent fewer dwelling units than the proposed Project and no overnight accommodations (i.e., the 75-room resort inn). As previously described in Section 4.1.7 of Section 4.1, Land Use and Related Planning Programs, the Project site is surrounded by established communities of residential development and is an active oilfield. There are no other uses on site or public access to the site. Therefore, as with the proposed Project, Alternative D would not physically divide an established community (Threshold 4.1-1). However, as with the proposed Project, there would be land use incompatibility with respect to night illumination associated with the Community Park and long-term noise impacts on those

Newport Crest residences immediately contiguous to the Project site. In addition, there would be a potential long-range noise impacts for residents on 17th Street west of Monrovia Avenue. For noise, though mitigation is proposed, noise impacts would remain significant if the residents of Newport Crest elect not to implement the mitigation measures to reduce the increased interior noise levels and if the City of Costa Mesa does not implement the recommended measure of resurfacing the street with rubberized asphalt.

Threshold 4.1-2 pertains to consistency with any applicable plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. As with the proposed Project, Alternative D would be consistent with land use policies, outlined in Table 4.1-6, City of Newport Beach General Plan Consistency Evaluation. However, this Alternative would not provide visitor-serving uses in the form of overnight accommodations, as called for in the City's General Plan and the Coastal Act. Without the overnight accommodations component, this Alternative would not provide job opportunities to the same extent as the proposed Project. These were project elements that the City, when preparing the updated General Plan, identified for the Newport Banning Ranch site. Though this would not be considered a significant impact, when evaluating the consistency of Alternative D and the proposed Project with applicable planning programs, the proposed Project has a greater level of compliance. Therefore, Alternative D would have greater impacts than the proposed Project for this threshold.

Aesthetics and Visual Resources

The City does not have any designated scenic vistas, and West Coast Highway is not a State- or locally designated scenic highway. Therefore, similar to the proposed Project, Alternative D would not result in any impacts to this type of resource (Threshold 4.2-1).

Compared to the proposed Project, Alternative D assumes both a reduction in the amount of development that would occur on the Project site and a reduction in the acreage associated with that development. The same roadway system is proposed, including the North Bluff Road. While Alternative D would provide slightly more open space than the proposed Project, the overall visual changes to the Project site associated with the implementation of Alternative D would be similar to those anticipated to occur under the proposed Project. The site would be converted from an active oilfield to a developed condition. Visibly notable features of the proposed Project that would not be constructed with Alternative D are the resort inn and the pedestrian/bicycle bridge over West Coast Highway. Removal of the resort inn would reduce the mass of the buildings visible from key locations, such as West Coast Highway. The removal of the pedestrian bridge would also reduce the change to views from West Coast Highway. Though these are important components, the visual changes to the Project site associated with the implementation of Alternative D would not be substantially different from the proposed Project. The character of the Project site would change to a suburban environment, consistent with the surrounding uses. Similar to the proposed Project, Alternative D would not result in a significant topographical or aesthetic impact (Threshold 4.2-2).

Under both the proposed Project and this Alternative, significant and unavoidable impacts would occur with the creation of nighttime light. Because Alternative D would be developed with generally the same land uses, Alternative D would introduce new sources of light on the Project site similar to the proposed Project, resulting in nighttime lighting into a currently unlit area. This increased nighttime lighting on the Project site is considered a significant unavoidable impact (Threshold 4.2-3). As discussed for the proposed Project, as part of the General Plan update, the City identifies the need for having an active park, with lighted ball fields. The City of Newport Beach General Plan Final EIR finds that the introduction of new sources of lighting associated with development of the site would be considered significant and unavoidable. The conclusions

of the proposed Project and this Alternative with respect to night lighting are consistent with the General Plan Findings of Fact and Statement of Overriding Considerations.

As with the proposed Project, Alternative D would be consistent with the intent of the aesthetic resources goals and policies of the *City of Newport Beach General Plan* and the California Coastal Act (Threshold 4.2-4).

Geology and Soils

Alternative D would have a smaller development footprint compared to the proposed Project. Alternative D represents an approximately 11 percent reduction in the grading footprint. Because the reduction comes at the Project's perimeter, however, the corresponding reduction in grading is expected to be somewhat less. The expected earthwork reduction for both the mass excavation and corrective grading is in the range of 8 to 10 percent for this Alternative.

As indicated in Section 4.3, Geology and Soils, the Project site is located in a seismically active area with faults within the proposed development site that could not be proven to be inactive (Threshold 4.3-1). Alternative D proposes fewer structures than the proposed Project; however, the nature of the development would be the same (i.e., residential village). Alternative D would result in the potential for impacts associated with surface fault rupture and seismic shaking (Threshold 4.3-2). It is reasonable to assume that Alternative D would be subject to the same type of measures outlined in the Mitigation Program in Section 4.3.9 and that the potential impacts would be reduced to less than significant levels. Because of the reduced footprint, reduction in dwelling units, and elimination of the resort inn, Alternative D would expose fewer people and structures to impacts associated with these thresholds and therefore, impacts would be incrementally less than the proposed Project.

As indicated in Section 4.3, Geology and Soils, two fault segments on the Project site have not been confirmed as inactive, and development setbacks have been recommended. The fault setback zones would reduce the risk of surface fault rupture. As with the proposed Project, it is assumed that Alternative D would be required to incorporate strengthened building foundations and structural design which would accommodate strong seismic shaking on the Project site. Habitable structures would be restricted to the Upland area, avoiding soils that may liquefy or undergo lateral spreading and, where necessary, corrective grading would ensure all structures are placed on competent foundation materials. Furthermore, this Alternative would not result in impacts from seismic-related ground failure, liquefaction, lateral spreading, soil collapse, or landslides (Thresholds 4.3-3 and 4.3-6). Implementation of the Mitigation Program in Section 4.3.9 would reduce potential impacts to less than significant. Because of the reduced footprint and reduction in dwelling units, Alternative D would expose fewer people and structures to impacts associated with these thresholds and therefore, would be less than the proposed Project.

As with the proposed Project, Alternative D would be subject to some existing on-site potential for landslides under dynamic seismic conditions. Consistency with the CBC, City building code requirements, and General Plan policies along with the incorporation of bluff setback zones would ensure that impacts associated with on- and off-site landslides would be less than significant (Threshold 4.3-4). Because of the reduced footprint and reduction in dwelling units, Alternative D would expose fewer people and structures to impacts associated with these thresholds and therefore, the impacts would be less than the proposed Project.

As with the proposed Project, grading activities associated with Alternative D would increase the potential for soil erosion and loss of topsoil (Threshold 4.3-5). With the incorporation of

construction BMPs as described in Section 4.4, Hydrology and Water Quality, impacts on soil erosion and loss of topsoil would be less than significant. Design measures would be applied through the approval process that would require that post-construction soil erosion and loss of topsoil be minimized through the use of engineered grading, surface drainage improvements, and landscaping. This Alternative would require slightly less grading; therefore, impacts associated with this threshold would be incrementally less than the proposed Project.

On-site soils have a low to medium expansion potential. As with the proposed Project, incorporation of standard conditions and mitigation measures would reduce impacts from this Alternative associated with expansive soils to a less than significant level (Threshold 4.3-7). Because of the reduced footprint and reduction in dwelling units, Alternative D would expose fewer people and structures to impacts associated with these thresholds and therefore, would be less than the proposed Project.

Both the proposed Project and Alternative D would be consistent with the intent of the soils and geology-related goals and policies of the City of Newport Beach General Plan and the California Coastal Act (Threshold 4.3-8).

Hydrology and Water Quality

Alternative D would result in on-site grading and development on the Project site but not to the same extent as there would be less development. As with the proposed Project, Alternative D would result in an increase in impervious surfaces, although to a slightly lesser degree than the proposed Project, and would increase the amount of runoff and the concentration of pollutants in storm water runoff (Thresholds 4.4-1, 4.4-6, 4.4-11, 4.4-12, and 4.4-13). Implementation of the Mitigation Program in Section 4.4.7 of the EIR would ensure that these impacts would be reduced to a less than significant level. However, when these impacts are compared to the proposed Project, Alternative D would result in fewer impacts. These impacts would be less than significant.

The proposed Project would result in an increase in impervious surface and would reduce the potential for groundwater percolation (Threshold 4.4-2); implementation of treatment-control BMPs and LID features would ensure that impacts would be less than significant. Alternative D would have less impervious surface than the proposed Project; therefore, potential impacts to groundwater would be less than the proposed Project. This impact would be less than significant.

This Alternative would involve changes to existing drainage patterns and would cause increases in erosion of the Project site or surrounding areas that would occur with the proposed Project (Thresholds 4.4.3 and 4.4-15). Implementation of the Mitigation Program in Section 4.4.7 of the EIR would ensure that these impacts would be reduced to a less than significant level. However, when compared to the proposed Project, Alternative D would result in a slight reduction in impacts because of the smaller project footprint. This impact would be less than significant.

Alternative D would result in increases in impervious surfaces and in peak flow runoff and runoff volumes from the site (Thresholds 4.4-4 and 4.4-14). However, the increase would be less than the proposed Project. Implementation of the Mitigation Program in Section 4.4.7 of the EIR section would ensure that impacts related to on-site or downstream flooding would be considered less than significant. As with the proposed Project, the impact of Alternative D on on-site or downstream flooding would be considered less than significant.

This Alternative would also affect the capacity of existing or planned storm water drainage systems (Threshold 4.4-5). Since the same drainage improvements would be constructed but there would be incrementally less grading and development, the impacts with Alternative D would be slightly less when compared to the proposed Project. This impact would be less than significant.

As with the proposed Project, housing associated with Alternative D would be located on the Upland at elevations well outside the 100-year floodplain. There would be no impacts to or from the 100-year floodplain for both the proposed Project and Alternative D (Thresholds 4.4-7 and 4.4-8).

The Project site is located at the lower end of the watershed and is not located within any dam inundation areas. As with the proposed Project, housing associated with Alternative D would be located on the Upland and people and/or structures would not be exposed to significant risk associated with the failure of a levee or dam (Threshold 4.4-9). Potential impacts associated with Threshold 4.4-9 would be less than significant for both the proposed Project and Alternative D.

There are no permanent standing water bodies in the Upland area and inundation by tsunami is not likely because of Project site elevations and the City's existing Emergency Management Plan. Therefore, as with the proposed Project, inundation by seiche, tsunami, or mudflow is not likely for this Alternative (Threshold 4.4-10).

Alternative D would not conflict with applicable policies (Threshold 4.4-16). As with the proposed Project, this Alternative would be consistent with the Harbor and Bay Element, Natural Resources Element, and Safety Element goals and policies, which were outlined in Table 4.4-25, City of Newport Beach General Plan Consistency Evaluation and the relevant California Coastal Act policies which were outlined in Table 4.4-26, California Coastal Act Consistency Analysis.

Hazards and Hazardous Materials

As discussed in Section 4.5, Hazards and Hazardous Materials, with implementation of the identified Mitigation Program, potentially significant impacts related to the historical and continuing oil operations on the Project site and the potential presence of ACMs and LBP in some structures would be reduced to a level considered less than significant. Alternative D assumes similar land uses within a similar development plan as the proposed Project except for the overnight accommodations (75-room resort inn) component. The presence or absence of the resort inn and incremental decrease in the number of units is inconsequential to the need for, or implementation of, the RAP. This Alternative would require implementation of the final RAP, including consolidation of oilfield activities. Therefore, like the proposed Project, with implementation of the Mitigation Program, Alternative D would result in less than significant impacts related to Thresholds 4.5-1 and 4.5-2, which pertain to the creation of hazards associated with the transport, use, disposal and/or emissions of hazardous materials and location on an identified hazardous materials site.

Both the construction and operational characteristics of Alternative D are the same as the proposed Project. The long-term operation of the development would not emit hazardous emissions within ¼ mile of a school. Since the remediation activities may establish off-site haul routes on streets that pass existing schools, Alternative D may have slightly less impact than the proposed Project because it would reduce the amount of grading by 8 to 10 percent. Implementation of standard conditions would provide for impacts to be considered less than significant. This is consistent with the finding for the proposed Project (Threshold 4.5-3).

The Project site is not identified on the Cortese List, which is compiled pursuant to Section 65962.5 of the *California Government Code*. Therefore, there would be no impact associated with Threshold 4.5-4.

Threshold 4.5-5 pertains to consistency with any applicable plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Alternative D would not conflict with any applicable land use, harbor and bay, natural resource, or safety policies because it would provide for the consolidation of oilfield activities and remediation of the site, same as the proposed Project. The policies, which were outlined in Table 4.5-5, City of Newport Beach General Plan Consistency Evaluation, call for the prohibition of new oil and gas extraction activities, the consolidation and/or relocation of existing oil operations, to limit hazards associated with oil operations, and to remediate soil and groundwater contamination. This Alternative would be consistent with provisions of the General Plan. For this threshold, this Alternative would have similar impact to the proposed Project, and would remain less than significant.

Biological Resources

Alternative D would include the primary features of the proposed Project, but assumes both a reduction in the amount of development that would occur and a reduction in the acreage associated with that development.

Because the proposed Project and Alternative D have minimal differences in their impact areas, their corresponding impacts to biological resources are expected to be similar. Alternative D would result in a substantial adverse effect on special status plant and wildlife species similar to, however, slightly less, than the proposed Project (Threshold 4.6-1). As discussed in Section 4.6, Biological Resources, with implementation of the identified Mitigation Measures, potentially significant impacts to special status species from Alternative D would be reduced to a level considered less than significant.

This Alternative would involve a substantial adverse effect on riparian habitat (woodland/scrub habitats and marsh areas) and other sensitive natural communities (e.g., coastal sage scrub) (Thresholds 4.6-2 and 4.6-3). Although these impacts are expected to be less than the proposed Project, they are still considered significant. As discussed in Section 4.6, Biological Resources, with implementation of the identified Mitigation Measures, potentially significant impacts to special status habitats would be reduced to a level considered less than significant. This finding would be applicable to Alternative D, as well.

Development on the Project site, which is highly disturbed due to the oilfield operations and is primarily limited to the upland area, would reduce the habitat available for species moving along the Santa Ana River and those using the upland portions of the Project site as a migration stopover point. This impact would be considered significant for both Alternative D and the proposed Project (Threshold 4.6-4). However, Alternative D would retain more area in open space so the impact would be incrementally less than the proposed Project. As discussed in

Section 4.6, Biological Resources, with implementation of the identified Mitigation Measures, these potentially significant impacts would be reduced to a level considered less than significant.

As with the proposed Project, any acreage to be restored after fulfilling mitigation requirements and requiring restoration would be placed in a reserve area (mitigation bank) or similar mechanism and may be made available to third parties seeking off-site areas in which to fulfill their respective mitigation obligations. The area would be restored in accordance with the Habitat Restoration Plan. One area that is contemplated for inclusion in a mitigation bank is the land proposed for use for the consolidated oil operations. Upon cessation of oil production operations, these two Oil Consolidation sites would be remediated and could be available in a reserve area.

This Alternative would also not conflict with any local or regional policies or ordinances protecting biological resources or provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan (Threshold 4.6-5).

Population, Housing, and Employment

Alternative D would result in approximately 13 percent fewer dwelling units than the proposed Project and would not include the resort inn. This is less than what is assumed with the Residential Village concept presented in the General Plan, but greater than the Open Space scenario of the General Plan (Alternative B). This Alternative would not result in a substantial population growth, nor would it exceed projected growth estimates for the area (Threshold 4.7-1). To meet the City's RHNA goals and to implement the Housing Element, there would need to be an intensification of development in one of the eight other locations identified in the General Plan as being suitable for residential development. Assuming the total number of units developed in the City would remain the same, impacts would be less than significant with respect to consistency with population projections.

Alternative D would not provide the visitor accommodations called for in the General Plan; therefore, it would not provide the same level of employment assumed as part of the long-range planning. In addition, it would not contribute as much as the proposed Project to meeting the City's housing goals. Alternative D would also include an AHIP and contribute to meeting the City's affordable housing goals, but to a lesser degree than the proposed project. This Alternative would require intensification of affordable housing development elsewhere in the City to meet the RHNA requirements. In addition to the reduction in the number of affordable units, Alternative D would have a reduction of a 175 du. To ensure the City's contribution to the regional housing requirements are met, intensification of density would be required elsewhere within the City. Increasing density elsewhere may require a General Plan Amendment. City Charter Section 423 requires a vote if the number of dwelling units in any statistical area is increased by more than 100. It is uncertain if the residual density would be spread throughout multiple statistical areas or absorbed by one area. If it were proposed to be placed in one statistical area, it is uncertain if this would be approved by voters. While these impacts would be less than significant and overall Alternative D would be consistent with the applicable policies; this Alternative would not meet the City's goals for affordable housing and employment as effectively as the proposed Project (Threshold 4.7-2). This Alternative would be consistent with the California Coastal Act provision pertaining to population and housing.

Recreation and Trails

Alternative D assumes both a reduction in the amount of development that would occur on the Project site and a reduction in the acreage associated with that development. There would also be a reduction in the amount of parkland from approximately 51 acres to approximately 39.1 acres of parks. This Alternative does not include a Nature Center or trails. However, under Alternative D, open space uses would increase from 252.3 gross acres to 269.1 gross acres. As with the proposed Project, as part of this Alternative, the Community Park would be constructed by the Applicant; it would be offered for dedication to the City; and upon acceptance, it would be maintained by the City. Alternative D would increase the demand for park and recreational facilities similar to that of the proposed Project. While this Alternative does not offer the same amenities or number of amenities as the proposed Project, it would meet the recreational needs of the Project without accelerating the deterioration of existing facilities. Both Alternative D and the proposed Project would have less than significant impacts with respect to recreation (Thresholds 4.8-1, 4.8-2, and 4.8-3). However, this Alternative does not provide as many recreational amenities of the proposed Project, which proposes 51.4 acres of parkland and a trail network.

As with the proposed Project, Alternative D would be consistent with the intent of the recreational resources goals and policies of the *City of Newport Beach General Plan* and the California Coastal Act (Threshold 4.2-4). Because this Alternative would provide fewer trails and would not construct the pedestrian/bike overcrossing, it would provide less public access opportunities than the proposed Project from a Coastal Act policy perspective. Though consistent, the proposed Project better meets the recreational goals and policies.

Transportation and Circulation

Alternative D assumes basically the same arterial roadway network as the proposed Project. The number of residences in the Urban Colony would decrease from 730 du to 525 du. The resort inn in the Resort Colony would be eliminated. There would also be a redistribution of the commercial development. The commercial use in the Urban Colony would decrease from 75,000 sf to 60,000 sf and 15,000 sf of commercial use would be allocated to the area designed by the proposed Project as the Resort Colony. This commercial use would be visitor-serving and is anticipated to be a combination of shopping and restaurant uses with an emphasis on restaurants.

Although this Alternative would have fewer units and no resort inn, it is projected that there would be a lower number of average daily trips (ADT), an increase in the number of AM peak hour trips, and a slight decrease in PM peak hour trips.

The trip generation associated with Alternative D is provided in Table 7-16. Alternative D would generate 14,749 ADT with 962 AM peak hour trips and 1,408 PM peak hour trips. When compared to the proposed Project, Alternative D would have a reduction of 240 average daily trips, but an increase of 56 trips in the AM peak hour and a decrease of 22 trips in the PM peak hour. Moving the location of visitor-serving commercial uses to the Resort Colony from the Urban Colony would result in a redistribution of some trips on the circulation network, with more trips expected to be generated in the southerly portion of the Project site, which would be expected to result in a slightly higher volume of traffic on the southern portion of Bluff Road and use of 15th Street easterly of the Project site.

**TABLE 7-16
 ALTERNATIVE D TRIP GENERATION**

Trip Rates										
Land Use	ITE Code	Trips per	Trip Generation Rates							
			Daily	AM Peak Hour			PM Peak Hour			
				In	Out	Total	In	Out	Total	
Single-Family Detached Housing	210	du	9.57	0.19	0.56	0.75	0.64	0.37	1.01	
Residential Condominium/Townhouse	230	du	5.81	0.07	0.37	0.44	0.35	0.17	0.52	
Park ^a	412	Acre	2.28	0.01	0.00	0.01	0.02	0.04	0.06	
Soccer Complex	488	Field	71.33	0.70	0.70	1.40	14.26	6.41	20.67	
Tennis Courts	490	Court	31.04	0.84	0.84	1.68	1.94	1.94	3.88	
Shopping Center ^b	820	ksf	See Formulas Below							
High-Turnover (Sit-Down) Restaurant ^c	932	ksf	127.15	5.99	5.53	11.52	6.58	4.57	11.15	
Project Trip Generation										
Project Area	Land Use	Units	Daily	Trip Generation						
				AM Peak Hour			PM Peak Hour			
				In	Out	Total	In	Out	Total	
South Family Village	Single-Family Detached Housing	141	du	1,349	27	79	106	90	52	142
	Park	28	Acre	64	0	0	0	1	1	2
	Soccer Complex	4	Fields	285	3	3	6	57	26	83
	Tennis Courts	6	Courts	186	5	5	10	12	12	24
Subtotal			1,884	35	87	122	160	91	251	
Resort Colony	Residential Condominium/Townhouse	87	du	505	6	32	38	30	15	45
	High-Turnover (Sit-down) Restaurant ^c	15	ksf	1,907	90	83	173	99	69	168
	Subtotal			2,412	96	115	211	129	84	213
North Family Village	Single-Family Detached Housing	282	du	2,699	54	158	212	180	104	284
	Residential Condominium/Townhouse	135	du	784	9	50	59	47	23	70
	Subtotal			3,483	63	208	271	227	127	354
Urban Colony	Residential Condominium/Townhouse	525	du	3,050	37	194	231	184	89	273
	Shopping Center ^b	60	ksf	4,872	70	44	114	221	230	451
	Subtotal			7,922	107	238	345	405	319	724
Eastern Residential Colony	Residential Condominium/Townhouse	30	du	174	2	11	13	11	5	16
Total Before Internal Capture/Pass-By			15,875	303	659	962	932	626	1,558	
Internal Capture^d			1,126				55	55	110	
Pass-By Reduction for Retail (10%)^e							20	20	40	
Total Alternative D Project Trips			14,749	303	659	962	857	551	1,408	
Total Proposed Project Trips			14,989	251	655	906	866	564	1,430	

ITE: Institute of Transportation Engineers; du: dwelling unit; ksf: thousand square feet
^a Trip generation is based on ITE Land Use County Park (Land Use 412) because this category includes peak hour trip rates.
^b Trip rates for Shopping Center are derived from the following regression equations: T = Trip Ends, X = units in ksf
 ADT: Ln(T) = 0.65 Ln(X) + 5.83
 AM Peak Hour: Ln(T) = 0.59 Ln(X) + 2.32
 PM Peak Hour: Ln(T) = 0.67 Ln(X) + 3.37
^c Trip generation is based on ITE land use 932 (High-Turnover Restaurant), a higher generator than shopping center.
^d Source: Institute of Transportation Engineers (ITE) publication *Trip Generation Handbook*. See Internal Capture Worksheets in Appendix C of the Kimley-Horn Traffic Impact Analysis.
^e Note: The ITE publication *Trip Generation Handbook* indicates pass-by for a shopping center is 34% in the PM peak hour. 10% is assumed here, for a conservative approach. Pass-by reduction is taken on balance of retail trips, after Internal Capture reduction
 Source: Kimley-Horn 2011.

Intersection Levels of Service: Alternative D would be expected to result in a slight decrease in ADT and PM peak hour traffic volumes but a slight increase in AM peak hour trips when compared to the proposed Project. Based on the lower volume of ADT and PM peak hour volumes, Alternative D would not create additional roadway or intersection deficiencies when compared to the proposed Project. The slight increase in AM peak hour volumes would not be expected to cause any of the intersections forecasted to operate at an acceptable level of service with the Project to operate at an unacceptable level of service with this Alternative. Both Alternative D and the proposed Project would be expected to significantly impact the intersection of Newport Boulevard at West Coast Highway in the City Newport Beach. The impact can be mitigated to a level considered less than significant with the implementation of SC 4.9-3 and MM 4.9-1.

Both Alternative D and the proposed Project would be expected to result in a significant impact at seven intersections in Costa Mesa: Newport Boulevard at 19th Street, Newport Boulevard at Harbor Boulevard, Newport Boulevard at 18th Street/Rochester Street, Newport Boulevard at 17th Street, Monrovia at 19th Street, Pomona Avenue at 17th Street, and Superior Avenue at 17th Street. Implementation of MM 4.9-2 would mitigate the impact to a level considered less than significant. However, the City of Newport Beach cannot impose mitigation on another jurisdiction. Therefore, if the Applicant is unable to reach an agreement with the City of Costa Mesa that would ensure that Alternative D and proposed Project impacts occurring in Costa Mesa would be mitigated concurrent with or preceding the impact, for purposes of this EIR, the impacts to be mitigated by the improvements would remain significant and unavoidable.

Congestion Management Plan Intersection: Consistent with the findings for the proposed Project, Alternative D would not be expected to cause the intersection of Newport Boulevard at West Coast Highway to fall below the CMP level of service standards. Therefore, no significant impact would be expected to occur.

State Highway Intersections: Neither Alternative D nor the proposed Project would be expected to cause any State intersections to operate at a deficient level of service. No significant impact would occur.

Freeway Mainline Segments: Neither Alternative D nor the proposed Project would be expected to significantly impact any freeway segments.

Therefore with respect to Threshold 4.9-1 (would the project cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system [i.e., result in a substantial increase in either the number of vehicle trips, the volume-to-capacity ratio on roads, or congestion at intersections]), both Alternative D and the proposed Project would be expected to result in significant impacts at the same intersections in the traffic study area, some of which would remain unavoidable impacts because the City of Newport Beach cannot guarantee implementation of the Mitigation Program in Costa Mesa. This Alternative would not conflict with the CMP (Threshold 4.9-2). As with the proposed Project, Alternative D would not substantially increase hazards due to a design feature, incompatible land uses, or inadequate emergency access (Threshold 4.9-3). As with the proposed Project, Alternative D land uses would be required to provide adequate on-site parking. No parking impacts would occur with this alternative (Threshold 4.9-4).

With respect to Threshold 4.9-5—which addresses consistency with transportation-related plans, policies, and regulations—both Alternative D and the proposed Project would require amendments to the City of Newport Beach General Plan Circulation Element's Master Plan of Streets and Highways and the Orange County Master Plan of Arterial Highways (MPAH). The

same modifications to the roadway system are proposed for Alternative D and the proposed Project. However, both the proposed Project and Alternative D would be consistent with applicable transportation policies.

Air Quality

Alternative D would have less development than the proposed Project because there would be less developed area, 175 fewer housing units and no resort inn. Construction maximum daily emissions would be essentially the same as for the proposed Project, although construction duration would be less. The impacts described for the proposed Project would also be applicable to Alternative D. Regional (mass) emissions of NO_x are forecasted to exceed applicable thresholds in some construction years (Threshold 4.10-2). Localized concentrations of CO, NO₂, PM₁₀, and PM_{2.5} due to construction activities would not exceed the applicable thresholds (Threshold 4.10-2). The analysis of TAC emissions to both off-site and on-site receptors demonstrates that the cancer risk, the cancer burden, the chronic hazard risk and the acute hazard risk would be less than significant (Threshold 4.10-4), as would odors from construction and long-term operations (Threshold 4.10-5). The elimination of housing units and the resort inn proposed with Alternative D would result in an approximate 1.6 percent reduction in daily vehicle trips, which would be a negligible change in VMT compared to the proposed Project. The reduction in VMT would not change the impact conclusions. As a result, the following significant and unavoidable impacts would occur:

- Without mitigation, regional (mass) emissions of NO_x are forecasted to exceed applicable thresholds in some construction years. Implementation of the Mitigation Program would reduce the emissions to less than significant. However, the availability of sufficient Tier 4 diesel engine construction equipment cannot be assured; thus the impact is potentially significant and unavoidable (Threshold 4.10-2).
- Long-term operational emissions of criteria pollutants would not exceed the SCAQMD mass emissions thresholds from initial occupancy through 2020. However, as Project development continues beyond 2020, emissions of VOC and CO would exceed the significance thresholds, principally due to vehicle operations (Threshold 4.10-2).
- The Project would have a significant cumulative air quality impact because its contribution to regional pollutant concentrations of O₃ would be cumulatively considerable (Threshold 4.10-3).

As with the proposed Project, development would not exceed the assumptions used to develop the SCAQMD AQMPs, and Alternative D would not conflict with or obstruct implementation of the SCAQMD AQMPs (Threshold 4.10-1) or other applicable policies of agencies with jurisdiction over the project (Threshold 4.10-6).

Greenhouse Gas Emissions

Alternative D construction GHG emissions would be less than for the proposed Project because there would be less development area and no construction of the resort inn or 175 residential units. Alternative D long-term GHG emissions would be slightly less than those associated with the proposed Project. Alternative D would have an incremental reduction in vehicle trips, and there would be less consumption of electricity, natural gas, and water because of the reduced development. Nevertheless, as with the proposed Project, the long-term GHG emissions generated by Alternative D would be substantially greater than the 6,000 MTCO₂e/yr significance threshold and would be a significant impact (Threshold 4.11-1). The cumulative

GHG emission impacts of this Alternative would be less than, but similar to, the proposed Project.

Neither the proposed Project nor Alternative D would conflict with applicable plans, policies, or regulations adopted for the purpose of reducing GHG emissions (Threshold 4.11-2).

Noise

Construction noise impacts for Alternative D would be very similar to those for the proposed Project, with the exception that there would be less impact or duration of impact to receptors near areas selected for less housing and elimination of the resort inn compared to the proposed Project. There would be periodic, temporary, unavoidable significant noise impacts that would cease upon completion of construction activities (Threshold 4.12-2). Vibration impacts would be the same as for the proposed Project (Threshold 4.12-3).

The reduction of 175 planned housing units and elimination of the resort inn from the proposed Project would result in an approximate 1.6 percent reduction in daily project-generated vehicle trips with a less than 1 percent increase in AM peak hour trips and a less than one percent decrease in PM peak hour trips. Because the roadway system for Alternative D is the same as for the proposed Project, cumulative noise levels on existing roadways at General Plan buildout for Alternative D would be similar to those for the proposed Project, with the exception that there would be a slightly higher volume of traffic on 15th Street easterly of the Project site. The noise level changes would be due to a combination of cumulative growth; a redistribution of traffic resulting from building Alternative D roads; and new trips generated by the development of residential, commercial, and park uses. There would be a significant noise impact on 17th Street west of Monrovia Avenue, the same as is forecasted for the proposed Project. As with the proposed Project, mitigation is proposed, but because these impacts would occur in the City of Costa Mesa and the City of Newport Beach cannot dictate mitigation outside its jurisdiction, it cannot be certain the mitigation would be implemented (Thresholds 4.12-1 and 4.12-4). There would be a significant noise impact on 15th Street, west of Monrovia Avenue in the *Existing Plus Project* and 2016 with Project scenarios, but not in the *General Plan Buildout* scenario, the same as is forecasted for the proposed Project, Although there would be a decrease in total trip generation, there would be a slight increase in traffic volumes on 15th Street due to a redistribution of traffic; thus the impact would be slightly greater than the proposed Project. As with the proposed Project, the impact can be mitigated to less than significant.

Although there would be a slight overall project trip reduction with Alternative D, the substitution of 15,000 sf of commercial development for the resort inn would increase traffic on Bluff Road between West Coast Highway and 15th Street. With Alternative D at General Plan buildout, future CNEL at the Newport Crest residences facing the Project site would increase from approximately 8 to 16 dBA above existing noise levels, which would be a significant noise impact. Future noise levels at the California Seabreeze and Parkview Circle residences, and at the Carden Hall School would be the same or slightly greater than with the proposed Project because redistribution of traffic on Bluff Road; the impact would be less than significant (Thresholds 4.12-1 and 4.12-4). Noise-abatement measures—including the construction of noise barriers to reduce exterior noise impacts and upgrades for windows on the facades of homes facing Bluff Road to reduce interior noise impacts—could reduce noise to a compatible level, as defined for new development by the General Plan. However, as with the proposed Project, from a CEQA perspective, the interior noise impacts on the first row of units in Newport Crest facing Newport Banning Ranch would remain a significant and unavoidable impact because the City of Newport Beach does not have the authority to mandate the implementation of mitigation on private property that is not on the Project site.

Traffic noise levels to proposed land uses (internal to the development) would be the same or very similar to those forecasted for the proposed Project, but slightly greater for development proposed adjacent to Bluff Road. Noise land use compatibility would be the same as for the proposed Project. Mitigation would be required to reduce traffic noise to proposed residential uses adjacent to roadways to achieve compatible noise levels required by the General Plan and the *California Code of Regulations* (Threshold 4.12-1).

Noise impacts from stationary sources associated with new residential and commercial development would be the same or very similar with Alternative D as with the proposed Project (Thresholds 4.12-1 and 4.12-4). Noise impacts from the possible drilling of new wells in the consolidated oilfield would be the same as for the proposed Project (Threshold 4.12-2).

As with the proposed Project, Alternative D would have no impacts pursuant to Thresholds 4.12-5 and 4.12-6 because the Project site is not within an airport land use plan or near a private airstrip so there would be no impacts from excessive aircraft noise levels. Similarly, Alternative D would be consistent with the goals and policies of the City of Newport Beach General Plan related to noise (Threshold 4.12-7).

Cultural and Paleontological Resources

Alternative D assumes a smaller grading area compared to the proposed Project. As with the proposed Project, there would be no direct impacts to known historic sites; however, grading and excavation could impact unknown historical resources (Threshold 4.13-1).

As with the proposed Project, Alternative D would impact three known archaeological sites (CA-ORA-839, CA-ORA-844B, and CA-ORA-906) that are deemed eligible for listing in the CRHR and NRHP. In addition, disturbance activities could also impact unknown resources (Threshold 4.13-2). The development activities for Alternative D would not be able to avoid the three known sites, but the potential for affecting unknown resources may be incrementally less than with the proposed Project because the area to be graded would be less.

As with the proposed Project, grading activities also have the potential to impact significant paleontological resources (Threshold 4.13-3) and unknown human remains, including those interred outside formal cemeteries (Threshold 4.13-4). The Mitigation Program identified for the proposed Project, would also be applicable to Alternative D. As discussed in Section 4.13, Cultural Resources, with implementation of the identified Mitigation Program (e.g., a data recovery program and construction monitoring by qualified professionals), potentially significant impacts related to the cultural resources identified within the Project site would be reduced to a level considered less than significant. Impacts with Alternative D would generally be the same as with the proposed Project.

Alternative D would not conflict with applicable land use policies (Threshold 4.13-5). As with the proposed Project, this Alternative would be consistent with the Land Use Element, Historic Resource Element, and Natural Resources Element goals and policies, which were outlined in Table 4.13-3, City of Newport Beach General Plan Consistency Analysis.

Public Services and Facilities

The public services and facilities evaluated in the EIR include the following: fire protection, police protection, schools, library services, and solid waste. Alternative D would result in approximately 13 percent fewer dwelling units than the proposed Project and no overnight accommodations. Therefore, the associated demand for public services (fire protection, police

protection, schools, library service, and solid waste) would be incrementally reduced compared to the proposed Project. However, as discussed for the proposed Project, Site Planning Area 12b, the northerly block of Site Planning Area 10a, and the northerly block of Site Planning Area 10b cannot be served by Station Number 2 within the established response time, which is a significant impact. As with the proposed Project, implementation of the Mitigation Program would be required and potential impacts to fire protection service associated with Alternative D would be less than significant (Threshold 4.14-1).

The increase in demand for police protection services would not require new facilities or other environmental impacts in order to maintain acceptable levels of service (Threshold 4.14-3). Because the number of dwelling units would be reduced compared to the proposed Project, the demand for schools and library service would be reduced with Alternative E compared to the proposed Project (Thresholds 4.14-5 and 4.14-7). The demand for solid waste services would be incrementally reduced because of the reduction in units and the elimination of the resort inn (Threshold 4.14-9). The impacts to Thresholds 4.14-3, 4.14-5, 4.14-7, and 4.14-9 would be less than significant.

The increase in service demand would not require other new facilities or other environmental impacts in order to maintain acceptable levels of service (Thresholds 4.14-3, 4.14-5, 4.14-7, and 4.14-9). Since Alternative D would result in reduced demand, this determination would also be applicable to Alternative D.

Thresholds 4.14-2, 4.14-4, 4.14-6, 4.14-8, and 4.14-10 pertain to consistency with any applicable plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. As with the proposed Project, this Alternative would meet the policies, which were outlined in Table 4.14-8, City of Newport Beach General Plan Consistency.

Utilities

The Utilities evaluated in the EIR included the following: Water, Wastewater Facilities, and Energy (Electricity and Natural Gas). The reduction in development associated with Alternative D compared to the proposed Project would result in an incremental reduction in demand for utilities (water supply, wastewater facilities, and energy-electricity and natural gas). However, the impacts associated with construction of new infrastructure for distribution of water and energy transmission would be the same for Alternative D, as for the proposed Project (Thresholds 4.15-1 and 4.15-7). From a water demand perspective, the impacts of Alternative D would be less than the proposed Project because there would be less development (Threshold 4.15-2).

Alternative D would generate less wastewater than the proposed Project because of the reduced development and would be required to comply with all the same regulations and wastewater treatment requirements as the proposed Project. Therefore, as with the proposed Project, impacts for Alternative D would be less than significant and slightly reduced compared to the proposed Project (Thresholds 4.15-4 and 4.15-5).

Thresholds 4.15-3, 4.15-6, and 4.15-8 pertain to consistency with any applicable plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. As with the proposed Project, this Alternative would meet the policies, which were outlined in Table 4.15-11, City of Newport Beach General Plan Consistency.

Conclusion

Alternative D would reduce the number of residential units by approximately 13 percent and eliminate the resort inn. The project footprint would be approximately 11 percent smaller. Although the nature of the impacts would be the same as those discussed for the proposed Project, the overall impacts associated with Alternative D would be less due to the reduced amount and area of development. However, it should be noted that this Alternative offers a reduced level of public amenities (i.e., trails, parks, and pedestrian bridge) compared to the proposed Project, and would not provide as much affordable housing as the proposed Project. Additionally, there are additional traffic impacts.

Significant and Unavoidable Impacts

This Alternative does not eliminate any of the significant impacts of the proposed project, but would substantially lessen the impacts because Alternative D would have a smaller footprint (approximately 11 percent less acres of developed with urban uses and parkland), involve less grading, and have less development (no resort inn and a reduction of approximately 13 percent in the number of units). Construction air emissions would remain significant and unavoidable, but would be lessened. Although not identified as significant and unavoidable, impacts associated with grading, habitat removal, and creation of impervious surfaces would be reduced compared to the proposed Project due to the reduction in the development footprint. The following significant and unavoidable impacts would occur with Alternative D:

- There would be land use incompatibility with respect to night illumination associated with the Community Park and long-term noise impacts on those Newport Crest residences immediately contiguous to the Project site. In addition, there would be a potential long-range noise impacts for residents on 17th Street west of Monrovia Avenue. For noise, though mitigation is proposed, noise impacts would remain significant if the residents of Newport Crest elect not to implement the mitigation measures to reduce the increased interior noise levels and if the City of Costa Mesa does not implement the recommended measure of resurfacing the street with rubberized asphalt (Threshold 4.1-1).
- Alternative D would include a “dark sky” lighting regulations in the NBR-PC that would apply to businesses (e.g., visitor-serving commercial and neighborhood commercial uses) and Homeowners Association-owned and operated land uses within 100 feet of the Open Space Preserve. However, Alternative D would introduce nighttime lighting into a currently unlit area. The Community Park is anticipated to have night lighting of active sports fields, which could result in light spillover onto adjacent properties. The night lighting impacts are considered significant and unavoidable. The City of Newport Beach General Plan Final EIR found that the introduction of new sources of lighting associated with development of the site would be considered significant and unavoidable. In certifying the General Plan Final EIR and approving the General Plan project, the City Council approved a Statement of Overriding Considerations, which notes that there are specific economic, social, and other public benefits that outweigh the significant and unavoidable impacts associated with the General Plan project (Threshold 4.2-3).
- When compared to the proposed Project, Alternative D would have a reduction of average daily trips (ADT), but an increase of trips in the AM peak hour and a decrease trips in the PM peak hour. Based on the lower volume of ADT and PM peak hour volumes, Alternative D would not create additional roadway or intersection deficiencies. Both Alternative D and the proposed Project would be expected to result in a significant impact at one intersection in the City of Newport Beach and seven intersections in the City of Costa Mesa. Impacts to the intersection of Newport Boulevard at West Coast

Highway in the City of Newport Beach can be mitigated to a level considered less than significant. Alternative D would impact the following Costa Mesa intersections: Newport Boulevard at 19th Street, Newport Boulevard at Harbor Boulevard, Newport Boulevard at 18th Street/Rochester, Newport Boulevard at 17th Street, Monrovia at 19th Street, Pomona Avenue at 17th Street, and Superior Avenue at 17th Street. Implementation of MM 4.9-2 would mitigate the impact to a level considered less than significant. However, the City of Newport Beach cannot impose mitigation on another jurisdiction. Therefore, if the Applicant is unable to reach an agreement with the City of Costa Mesa that would ensure that Alternative D impacts occurring in Costa Mesa would be mitigated concurrent with or preceding the impact, for purposes of this EIR, the impacts to be would remain significant and unavoidable (Threshold 4.9-2).

- Alternative D would have construction-related air quality impacts. During grading, large and fine particulate matter (PM10 and PM2.5, respectively) concentrations may exceed the SCAQMD CEQA significance thresholds at the property lines, but would not be likely to exceed ambient air quality standards (Threshold 4.10-2).
- Long-term operational emissions of criteria pollutants would not exceed the SCAQMD mass emissions thresholds from initial occupancy through 2020. However, as development continues beyond 2020, emissions of VOCs, CO, and PM10 would exceed the significance thresholds, principally due to vehicle operations (Threshold 4.10-2).
- Alternative D would have a significant cumulative air quality impact because its contribution to regional pollutant concentrations would be cumulatively considerable (Threshold 4.10-3).
- Alternative D would emit quantities of GHGs that would exceed the City's 6,000 MTCO₂e/yr significance threshold. Similar to the Project, Alternative D would make a cumulatively considerable contribution to the global GHG inventory affecting global climate change (Threshold 4.11-1).
- The increased traffic volumes on 17th Street west of Monrovia Avenue would expose sensitive receptors to noise levels in excess of the City of Newport Beach's standards for changes to the ambient noise levels. At buildout, noise levels would also exceed significance thresholds in the City of Costa Mesa (Threshold 4.12-2).
- For portions of the Newport Crest development, there would be a significant increase in the ambient noise level due to the projected traffic volumes in the buildout condition. MM 4.12-6 would reduce impacts to levels within the "Clearly Compatible" or "Normally Compatible" classifications but would remain above the 5 dBA significance criterion in the General Plan. MM 4.12-7 would provide interior noise attenuation but because the City of Newport Beach does not have the authority to mandate the implementation of mitigation on private property that is not on the Project site, the impact would be significant and unavoidable (Threshold 4.12-4).
- Use of construction equipment would result in a substantial temporary increase in ambient noise levels to nearby noise-sensitive receptors in the vicinity of the Project. Due to the low existing ambient noise levels, the proximity of the noise-sensitive receptors, and duration of construction activities, the temporary noise increases would be significant and unavoidable (Threshold 4.12-2).

Feasibility and Ability to Meet Project Objectives

This Alternative is potentially feasible. However, it would require the same investment in infrastructure as the proposed Project (e.g., the same circulation and infrastructure system

would be constructed for this Alternative as for the proposed Project), but the costs would have to be allocated over a smaller amount of development. Thus, the economic feasibility of this Alternative would be less certain. Further, public benefits, coastal access, and visitor-serving amenities would be reduced.

This Alternative is able to meet most of the project objectives. However, it does not meet the objective of providing overnight visitor accommodations (Objective 4), which is an important Coastal Act policy consideration and does not provide as extensive of a public access network (no pedestrian and bicycle bridge over West Coast Highway) as compared to the proposed Project. In addition, it only partially meets the following objectives:

- Development of a residential village of 1,375 residential units, offering a variety of housing types in a range of housing prices for future residents, including provision of affordable residential dwelling units to help meet the City's Regional Housing Needs Assessment (RHNA) (Objective 3).
- Provide enhanced public access through the Coastal Zone through a system of pedestrian walkways, multi-use trails, and on-street bikeways designed to encourage walking and biking as an alternative to the use of automobiles by providing connectivity among residential, commercial, park, open space, and resort uses within the Project site and to existing adjacent open space, hiking and biking trails, the beach, and the Pacific Ocean (Objective 8).

As previously indicated, Section 15126.6(a) of the State CEQA Guidelines requires that the alternatives "feasibly attain most of the basic objectives of the project". Since Alternative D is able to meet most of the project objectives, it is considered a potentially feasible alternative.

7.5.5 ALTERNATIVE E: REDUCED DEVELOPMENT AREA (NO RESORT INN)

Description of the Alternative

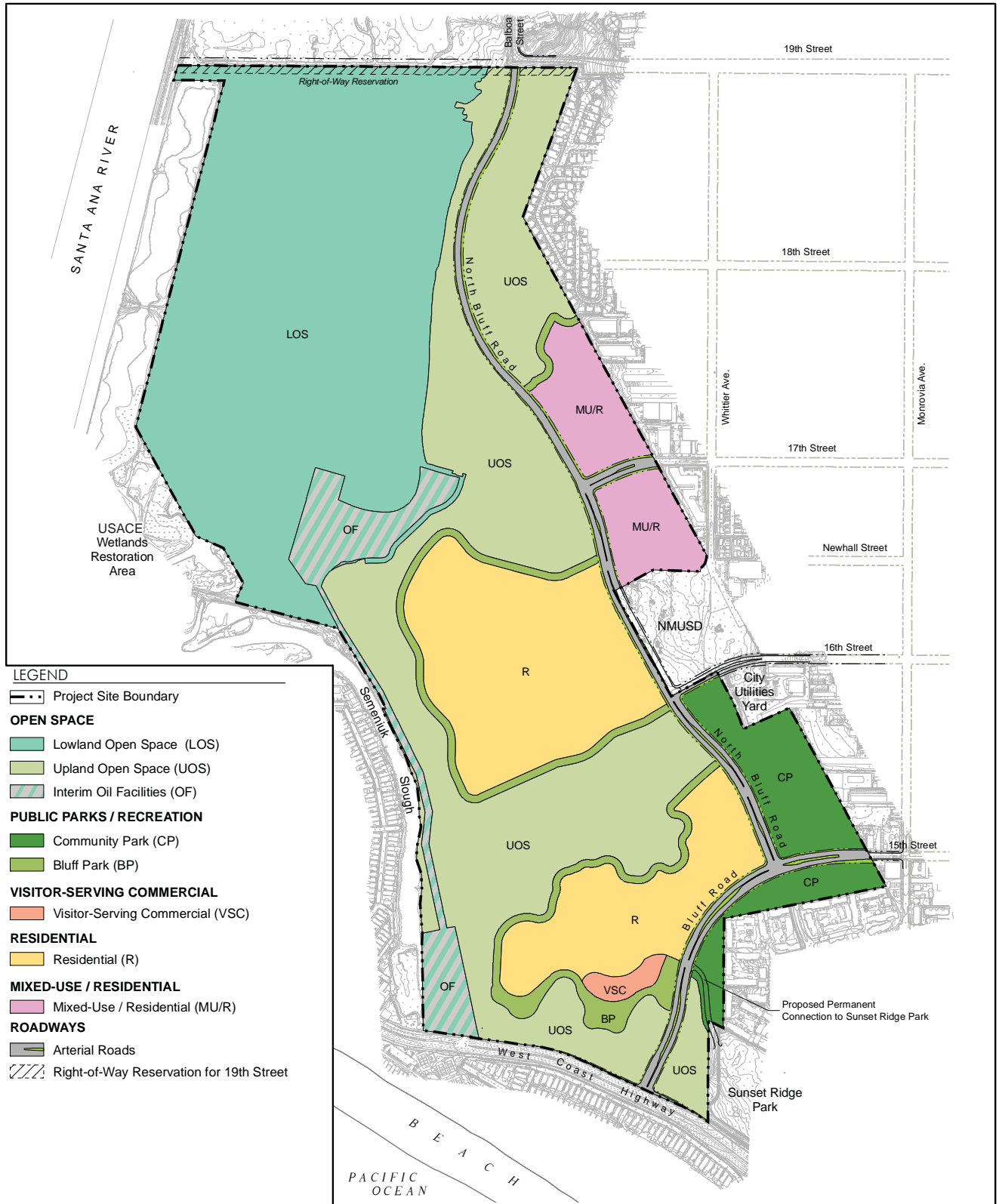
Alternative E was developed to evaluate potential benefits associated with reducing the project footprint, while maintaining the overall number of residential units and commercial component. However, this alternative would not provide the resort inn. This Alternative would result in an incremental reduction in impacts on natural resources because more area would be converted from oilfield operations to protected open space. However, it would not avoid any of the significant impacts associated with the proposed Project.

Alternative E assumes the same number of residential units (1,375 du) as proposed by the Project within a reduced footprint. The development area (residential, commercial, and visitor-serving uses) would decrease from 97.4 gross acres to 92.9 gross acres. Residential units would be provided at a higher density and on smaller lots than assumed for the proposed Project. The same roadway system is proposed. Open space uses would increase from 252.3 gross acres to 269.1 gross acres. This Alternative does not include a Nature Center or interpretive trails; provides 60,000 sf of neighborhood commercial uses (compared to 75,000 sf); provides 15,000 sf of visitor-serving commercial uses instead of the resort inn; and provides approximately 39.1 acres of parks, including a 24.8-gross-acre Community Park (compared to approximately 51.4 total acres of parklands under the proposed Project).⁸ As with the proposed Project, the Community Park would be constructed by the Applicant as part of this Alternative; it would be offered for dedication to the City; and upon acceptance, it would be maintained by the City. This Alternative does not assume a pedestrian and bicycle bridge spanning West Coast Highway.

Alternative E would require the same discretionary actions as noted for the proposed Project (also identified above under Alternative C). It is assumed that a Mitigation Program similar to what is proposed for the Project would be required for Alternative E. However, as discussed above, there are project features (such as the pedestrian bridge, Nature Center, and interpretive trails) that would not be incorporated in Alternative E.

Exhibit 7-8, Alternative E: Reduced Footprint and 1,375 Dwelling Units, depicts the land use plan for Alternative E. Table 7-17 identifies the land uses and acreage associated with the allowable land uses. Similar to the other land use alternatives, the exhibit reflects the land uses that would be allowed, which is not the same as the limits of land disturbance; additional impacts would be associated with the oilfield remediation, fuel modification, and any trails that ultimately are provided by other parties in open space.

⁸ Alternative E assumes compliance with Quimby Act, which would require approximately 15 acres of parkland based on 5 acres of park per 1,000 persons; the City assumes 2.19 persons per dwelling unit.



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Source: FORMA 2011

Alternative E: Reduced Footprint and 1,375 Dwelling Units

Exhibit 7-8

Newport Banning Ranch EIR



**TABLE 7-17
ALTERNATIVE E STATISTICAL SUMMARY**

Land Use District		Gross Acres ^a	Planned Dwelling Units	Maximum Permitted Commercial sf	Maximum Permitted Overnight Accommodations
Open Space					
LOS	Lowland Open Space ^b	130.6	–	–	–
UOS	Upland Open Space ^b	122.0			
OF	Interim Oil Facilities ^c	16.5	–	–	–
<i>Subtotal Open Space</i>		269.1	–	–	–
Public Parks/Recreation					
CP	Community Park	24.8	–	–	–
BP	Bluff Park ^d	14.3	–	–	–
<i>Subtotal Public Parks/Recreation</i>		39.1	–	–	–
Visitor-Serving Commercial					
VSC	Visitor-Serving Commercial ^e	2.0	–	15,000	–
<i>Subtotal Visitor-Serving Commercial</i>		2.0	–	15,000	–
Residential					
R	Residential (up to 10 du/ac) ^e	70.0	645	–	–
<i>Subtotal Residential</i>		70.0	645	–	–
Mixed-Use/Residential					
MU/R	Mixed-Use/Residential (up to 35 du/ac) ^e	20.9	730	60,000	–
<i>Subtotal Mixed-Use/Residential</i>		20.9	730	60,000	0
Total Project		401.1	1,375	75,000	0
sf: square footage; du/ac: dwelling units per acre					
^a Gross acres are measured to centerlines of all public roads where such roads are shown on the plan. Gross acres are computed using geographic information system (GIS) technology with accuracy to 10 decimal places. Acres are shown in this table to one decimal place					
^b The Right-of-Way Reservation for the 19 th Street Extension contains approximately 3.1 acres.					
^c Gross acres for the Bluff Park District may include fuel management zones and landscape focal points and greens.					
^d Gross acres for the Residential District, the Visitor-Serving Commercial District, and the Mixed-Use/Residential District may include fuel management zones, privately owned and maintained parks and recreational facilities, and landscape focal points and greens.					
^e The Interim Oil Facilities (Open Space Land Use) District includes: (1) the existing oil operations site near West Coast Highway; (2) the oil consolidation site near the middle of the Lowland; and (3) an oil access road (non-exclusive easement) connecting the two working sites.					

Comparative Analysis of Environmental Impacts

Land Use and Related Planning Programs

Alternative E assumes the same land uses and similar development plan as the proposed Project without the overnight accommodations (75 room resort inn) component. As previously described and in Section 4.1.7 of Section 4.1, Land Use and Related Planning Programs, the Project site is surrounded by established communities of residential development and is an active oilfield. There are no other uses on site or public access to the site. Therefore, as with the proposed Project, Alternative E would not physically divide an established community (Threshold 4.1-1). However, as with the proposed Project, there would be land use incompatibility with respect to night illumination associated with the Community Park and long-term noise impacts on those Newport Crest residences immediately contiguous to the Project

site. In addition, there would be a potential long-range noise impacts for residents on 17th Street west of Monrovia Avenue. For noise, though mitigation is proposed, noise impacts would remain significant if the residents of Newport Crest elect not to implement the mitigation measures to reduce the increased interior noise levels and if the City of Costa Mesa does not implement the recommended measure of resurfacing the street with rubberized asphalt.

Threshold 4.1-2 pertains to consistency with any applicable plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. This Alternative would generally be consistent with land use policies, outlined in Table 4.1-6, City of Newport Beach General Plan Consistency Evaluation. However, without the overnight accommodations component, this Alternative would not provide the visitor accommodations called for in the General Plan or the same level of job opportunities to the same extent as the proposed Project. Therefore, for this threshold, Alternative E would have greater impacts than the proposed Project.

Aesthetics and Visual Resources

The City does not have any designated scenic vistas, and West Coast Highway is not a State- or locally designated scenic highway. Therefore, similar to the proposed Project, Alternative E would not result in any impacts to this type of resource (Threshold 4.2-1).

The area with urban development (residential, commercial, and visitor-serving uses) for Alternative E would decrease from 97.4 gross acres to 92.9 gross acres, when compared to the proposed Project. Residential units would be provided at a higher density and on smaller lots than assumed for the proposed Project. The same roadway system is proposed including North Bluff Road. Visual changes to the Project site associated with the implementation of Alternative E would be similar to those anticipated to occur under the proposed Project since the site would be converted from an active oilfield to a developed condition. As discussed above for Alternative D, the removal of the resort inn and pedestrian bridge would reduce the mass of the project compared to the proposed Project as viewed from West Coast Highway. However, the overall change in visual character of the Project site associated with the implementation of Alternative E would not be substantially different from the proposed Project. The character of the Project site would change to a suburban environment, consistent with the surrounding uses. Similar to the proposed Project, Alternative E would not result in a significant topographical or aesthetic impact (Threshold 4.2-2).

Under both the proposed Project and this Alternative, significant and unavoidable impacts would occur with the creation of nighttime light. Because Alternative E would be developed with similar land uses, Alternative E would introduce new sources of light on the Project site similar to the proposed Project resulting in nighttime lighting into a currently unlit area. This increased nighttime lighting on the Project site is considered a significant and unavoidable impact (Threshold 4.2-3). A Statement of Overriding Considerations was adopted by the City Council for this impact as part of the certification of the General Plan EIR and General Plan project approval.

As with the proposed Project, Alternative E would be consistent with the intent of the aesthetic resources goals and policies of the *City of Newport Beach General Plan* and the California Coastal Act (Threshold 4.2-4).

Geology and Soils

Alternative E assumes the same land uses and a similar development plan as the proposed Project without the overnight accommodations component. Alternative E would require less grading compared to the proposed Project. This Alternative represents an approximate 11 percent reduction in the grading footprint. Because the reduction comes at the project's perimeter, however, the corresponding reduction in grading is expected to be somewhat less. The expected earthwork reduction for both the mass excavation and corrective grading is in the range of 8 to 10 percent less than the proposed Project.

As indicated in Section 4.3, Geology and Soils, the Project site is located in a seismically active area with faults within the proposed development site that could not be proven to be inactive (Threshold 4.3-1). Although Alternative E proposes fewer structures (no resort inn) than the proposed Project, it would result in the same potential for impacts associated with surface fault rupture and seismic shaking (Threshold 4.3-2). Implementation of the Mitigation Program in Section 4.3.9 would reduce potential impacts to less than significant levels, which is the same as the proposed Project. Because of the reduced footprint without the overnight accommodations, Alternative E would expose fewer people and structures to impacts associated with these thresholds and therefore, would be incrementally less than the proposed Project.

As indicated in Section 4.3, Geology and Soils, two fault segments on the Project site have not been confirmed as inactive, and development setbacks have been recommended. The fault setback zones would reduce the risk of surface fault rupture. As with the proposed Project, Alternative E would be required to incorporate strengthened building foundations and structural design, which would accommodate strong seismic shaking on the Project site. Habitable structures would be restricted to the Upland area, avoiding soils that may liquefy or undergo lateral spreading and, where necessary, corrective grading would ensure all structures are placed on competent foundation materials. As with the proposed Project, after implementation of mitigation measures, this Alternative would not result in significant impacts from seismic-related ground failure, liquefaction, lateral spreading, soil collapse, or landslides (Thresholds 4.3-3 and 4.3-6). Although the conditions and type of risk would be the same, because of the reduced footprint without the overnight accommodations, Alternative E would expose fewer people and structures to impacts associated with these thresholds and therefore, would be less than the proposed Project.

As with the proposed Project, Alternative E would be subject to some existing on-site potential for landslides under dynamic seismic conditions. Consistency with the CBC, City building code requirements, and General Plan policies along with the incorporation of bluff setback zones would ensure that impacts associated with on- and off-site landslides would be less than significant (Threshold 4.3-4). Because of the reduced footprint without the overnight accommodations, Alternative E would expose fewer people and structures to impacts associated with these thresholds and therefore, would be less than the proposed Project.

As with the proposed Project, grading activities associated with Alternative E would increase the potential for soil erosion and loss of topsoil (Threshold 4.3-5). With the incorporation of construction BMPs, as described in Section 4.4, Hydrology and Water Quality, impacts on soil erosion and loss of topsoil would be less than significant. Post-construction soil erosion and the loss of topsoil would be minimized through the use of engineered grading, surface drainage improvements, and landscaping. This Alternative would require slightly less grading; therefore, impacts associated with this threshold would be incrementally less than the proposed Project.

On-site soils have a low to medium expansion potential. As with the proposed Project, incorporation of SCs 4.3-1 through 4.3-3 and MMs 4.3-1 and 4.3-2, would reduce impacts from this Alternative associated with expansive soils to a less than significant level (Threshold 4.3-7). Because of the reduced footprint and reduction in dwelling units, Alternative E would expose fewer people and structures to impacts associated with these thresholds and therefore, would be less than the proposed Project.

Alternative E would be consistent with the intent of the soils and geology-related goals and policies of the City of Newport Beach General Plan and the California Coastal Act (Threshold 4.3-8), which is the same as the proposed Project.

Hydrology and Water Quality

Alternative E would result in on-site grading and development on the Project site but not to the same extent without the overnight accommodations component. As with the proposed Project, Alternative E would result in an increase in impervious surfaces, although to a slightly lesser degree than the proposed Project, and would increase the amount of runoff and the concentration of pollutants in storm water runoff (Thresholds 4.4-1, 4.4-6, 4.4-11, 4.4-12, and 4.4-13). Implementation of the Mitigation Program in Section 4.4.7 of the EIR would ensure that these impacts would be reduced to a less than significant. However, when compared to the proposed Project, Alternative E would result in incrementally fewer impacts.

The proposed Project would result in an increase in impervious surface and would reduce the potential for groundwater percolation (Threshold 4.4-2); implementation of treatment-control BMPs and LID features would ensure that project impacts would be less than significant. Alternative E would have less impervious surface than the proposed Project; therefore, potential impacts to groundwater would be incrementally less than the proposed Project. This impact would be less than significant.

This Alternative would involve the same changes to existing drainage patterns and would cause the same increases in erosion of the Project site and surrounding areas that would occur with the proposed Project (Thresholds 4.4.3 and 4.4-15). Implementation of the Mitigation Program in Section 4.4.7 of the EIR would ensure that these impacts would be reduced to a less than significant. However, when compared to the proposed Project, Alternative E would result in incrementally fewer impacts. These impacts would be less than significant.

Alternative E would result in increases in impervious surfaces and in peak flow runoff and runoff volumes from the site (Thresholds 4.4-4 and 4.4-14) and would also affect the capacity of existing or planned storm water drainage systems (Threshold 4.4-5). Since the same drainage improvements would be constructed but there would be incrementally less grading and development, the impacts with Alternative E would be slightly less when compared to the proposed Project. Implementation of the Mitigation Program in Section 4.4.7 of the EIR section would ensure that impacts related to on-site or downstream flooding would be considered less than significant.

As with the proposed Project, housing associated with Alternative E would be located on the Upland at elevations well outside the 100-year floodplain. There would be no impacts to or from the 100-year floodplain for both the proposed Project and Alternative E (Thresholds 4.4-7 and 4.4-8).

The Project site is located at the lower end of the watershed and is not located within any dam inundation areas. As with the proposed Project, housing associated with Alternative E would be

located on the Upland and people and/or structures would not be exposed to significant risk associated with the failure of a levee or dam (Threshold 4.4-9). Potential impacts associated with Threshold 4.4-9 would be less than significant for both the proposed Project and Alternative E.

There are no permanent standing water bodies in the Upland area, and inundation by tsunami is not likely because of Project site elevations and the City's existing Emergency Management Plan. Therefore, as with the proposed Project, inundation by seiche, tsunami, or mudflow is not likely for this Alternative (Threshold 4.4-10).

Alternative E would not conflict with applicable land use policies (Threshold 4.4-16). As with the proposed Project, this Alternative would be consistent with the Harbor and Bay Element, Natural Resources Element, and Safety Element goals and policies, which are outlined in Table 4.4-25, City of Newport Beach General Plan Consistency Evaluation, and the relevant California Coastal Act policies which are outlined in Table 4.4-26, California Coastal Act Consistency Analysis.

Hazards and Hazardous Materials

As discussed in Section 4.5, Hazards and Hazardous Materials, with implementation of the identified Mitigation Program, potentially significant impacts related to the historical and continuing oil operations on the Project site and the potential presence of ACMs and LBP in some structures would be reduced to a level considered less than significant. Alternative E would result in on-site grading and development on the Project site. While this Alternative would result in a reduced site development area than the proposed Project, this reduction would not affect the need for or implementation of the final RAP, as identified in the Mitigation Program. Therefore, like the proposed Project, with implementation of the Mitigation Program, this Alternative would result in less than significant impacts related to Thresholds 4.5-1 and 4.5-2, which pertain to the creation of hazards associated with the transport, use, disposal, and/or emissions of hazardous materials and location on an identified hazardous materials site.

Both the construction and operational characteristics of Alternative E would be similar to the proposed Project. The long-term operation of the development would not emit hazardous emissions within ¼ mile of a school site. However, since the remediation activities may establish off-site haul routes on streets that pass the existing schools, Alternative E may have slightly less impact than the proposed Project because it would reduce the amount of grading by 8 to 10 percent. Implementation of standard conditions would provide for impacts to be considered less than significant. This is consistent with the finding for the proposed Project (Threshold 4.5-3).

The Project site is not identified on the Cortese List which is compiled pursuant to Section 65962.5 of the *California Government Code*. Therefore, there would be no impact associated with Threshold 4.5-4.

Threshold 4.5-5 pertains to consistency with any applicable plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Alternative E would not conflict with applicable land use, harbor and bay, natural resource, and safety policies because it would provide for the consolidation of oilfield activities and remediation of the site, same as the proposed Project. The policies, which were outlined in Table 4.5-5, City of Newport Beach General Plan Consistency Evaluation, call for the prohibition of new oil and gas extraction activities and the consolidation and/or relocation of existing oil operations in order to limit hazards associated with oil operations and to remediate soil and groundwater contamination.

This Alternative would be consistent with provisions of the General Plan. For this threshold, this Alternative would have similar impact to the proposed Project, and would remain less than significant.

Biological Resources

Alternative E would include the primary features of the proposed Project, but assumes a reduction in the development acreage.

Because the proposed Project and Alternative E have minimal differences in their impact areas, their corresponding impacts to biological resources are expected to be similar. Alternative E would result in a substantial adverse effect on special status plant and wildlife species, which is similar but slightly less than the proposed Project (Threshold 4.6-1). As discussed in Section 4.6, Biological Resources, with implementation of the identified Mitigation Measures, potentially significant impacts to special status species from Alternative E would be reduced to a level considered less than significant.

This Alternative would involve a substantial adverse effect on riparian habitat (woodland/scrub habitats and marsh areas) and other sensitive natural communities (e.g. coastal sage scrub) (Thresholds 4.6-2 and 4.6-3). Although these impacts are expected to be less than the proposed Project, they are still considered significant. As discussed in Section 4.6, Biological Resources, with implementation of the identified Mitigation Measures, potentially significant impacts to special status habitats from the Open Space Alternative would be reduced to a level considered less than significant.

The area to be developed is highly disturbed due to oilfield operations and is primarily limited to the upland area; development of this area would reduce the habitat available for species moving along the Santa Ana River and those using the upland portions of the Project site as a migration stopover point. Impacts to wildlife migration corridors would be incrementally less for Alternative E than for the proposed Project because it proposes a smaller footprint; however, this impact would be considered significant, similar to the proposed Project (Threshold 4.6-4). However, as discussed in Section 4.6, Biological Resources, with implementation of the identified Mitigation Measures, these potentially significant impacts would be reduced to a level considered less than significant.

As with the proposed Project, any acreage to be restored after fulfilling mitigation requirements and requiring restoration would be placed in a reserve area (mitigation bank) or similar mechanism and may be made available to third parties seeking off-site areas in which to fulfill their respective mitigation obligations. The area would be restored in accordance with the Habitat Restoration Plan. One area that is contemplated for inclusion in a mitigation bank is the land proposed for use for the consolidated oil operations. Upon cessation of oil production operations, these two Oil Consolidation sites would be remediated and could be available in a reserve area.

This Alternative would also not conflict with any local policies or ordinances protecting biological resources or provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan (Threshold 4.6-5), same as the proposed Project.

Population, Housing, and Employment

Alternative E would have the same residential population as the proposed Project. This Alternative would create long-term employment opportunities and help balance the employment demands associated with the City's population; however, without the overnight accommodations component, it would not accomplish this to same extent when compared to the proposed Project.

Long-range planning programs assume approximately 36 percent of the projected population growth and 25 percent of the projected employment growth in the City for the 25-year period between 2010 and 2035 would be accommodated on the Newport Banning Ranch site. Alternative E would be the same as the proposed Project with respect to consistency with population projections and impacts would be less than significant (Threshold 4.7-1). This Alternative would provide the same commitment to affordable housing as the proposed Project. This Alternative would not require intensification of development elsewhere in the City to meet the City's RHNA allocation.

Alternative E would not provide the visitor accommodations called for in the General Plan; therefore, it would not provide the same level of employment assumed as part of the General Plan. While this impact would be less than significant and overall Alternative E would be consistent with the applicable policies; this Alternative would not meet the City's General Plan policies as effectively as the proposed Project (Threshold 4.7-2).

Recreation and Trails

With Alternative E, residential units would be provided at a higher density and on smaller lots than assumed for the proposed Project. Compared to the proposed Project, there would be a reduction on the amount of parkland from approximately 51.4 gross acres to 39.1 gross acres, but still including a 24.8-gross-acre Community Park. As with the proposed Project, the Community Park would be constructed by the Applicant as part of this Alternative; it would be offered for dedication to the City; and, upon acceptance, it would be maintained by the City. Alternative E does provide a 14.3-gross acre Bluff Park, which would be in addition to the Community Park in the proposed Project. As with Alternative D, this Alternative does not include a Nature Center or interpretive trails. However, under Alternative E open space uses would increase from 252.3 gross acres with the proposed Project to 269.1 gross acres. This Alternative does not include the pedestrian and bicycle bridge spanning West Coast Highway. While there is a reduction in development on the Project site, the same types of land uses would still be developed (residential, commercial, and visitor-serving commercial). Alternative E would increase the demand for park and recreational facilities similar to that of the proposed Project and sufficient parkland would be provided to meet applicable City standards. While this Alternative does not offer the same amenities or number of amenities, less than significant impacts would result with respect to recreation because sufficient parkland would be provided to meet the needs of the Alternative (Thresholds 4.8-1, 4.8-2, and 4.8-3). However, since this Alternative does not provide the recreational amenities of the proposed Project, which proposes 51.4 acres of parkland and a trail network, recreational benefits of the Project are greater than Alternative E.

Alternative E would be consistent with the intent of the recreational resources goals and policies of the *City of Newport Beach General Plan* and the California Coastal Act (Threshold 4.2-4). However, because this Alternative would provide few trails and would not construct the pedestrian/bike overcrossing, it would provide less public access opportunities than the proposed Project from a Coastal Act policy perspective. Therefore, it would not meet the recreational goals as effectively as the proposed Project.

Transportation and Circulation

Alternative E assumes the same arterial roadway network as the proposed Project. It also is proposed to provide the same number of residential units in the same basic distribution. The resort inn in the Resort Colony would be eliminated and there would also be a redistribution of the commercial development. The commercial use in the Urban Colony would decrease from 75,000 sf to 60,000 sf and 15,000 sf of commercial use would be reallocated to the 2-acre visitor-serving commercial site in the Resort Colony. This would be in lieu of the resort inn. The 15,000 sf of visitor-serving commercial use is anticipated to be a combination of shopping and restaurant uses.

Alternative E is projected to result in higher daily traffic volumes (by approximately 5.2 percent) as well as higher traffic during the AM and PM peak hours. The trip generation associated with Alternative E is provided in Table 7-18. Alternative E would generate 15,766 ADT with 1,039 AM peak hour trips and 1,500 PM peak hour trips.

**TABLE 7-18
ALTERNATIVE E TRIP GENERATION**

Trip Rates										
Land Use	ITE Code	Trips per	Trip Generation Rates							
			Daily	AM Peak Hour			PM Peak Hour			
				In	Out	Total	In	Out	Total	
Single-Family Detached Housing	210	du	9.57	0.19	0.56	0.75	0.64	0.37	1.01	
Residential Condominium/Townhouse	230	du	5.81	0.07	0.37	0.44	0.35	0.17	0.52	
Park ^a	412	acre	2.28	0.01	0.00	0.01	0.02	0.04	0.06	
Soccer Complex	488	Field	71.33	0.70	0.70	1.40	14.26	6.41	20.67	
Tennis Courts	490	Court	31.04	0.84	0.84	1.68	1.94	1.94	3.88	
Shopping Center ^b	820	ksf	Equation - See Below							
High-Turnover (Sit-Down) Restaurant ^c	932	ksf	127.15	5.99	5.53	11.52	6.58	4.57	11.15	
Project Trip Generation										
Project Area	Land Use	Units	Trip Generation							
			Daily	AM Peak Hour			PM Peak Hour			
				In	Out	Total	In	Out	Total	
South Family Village	Single-Family Detached Housing	141	du	1,349	27	79	106	90	52	142
	Park	28	acre	64	0	0	0	1	1	2
	Soccer Complex	4	Fields	285	3	3	6	57	26	83
	Tennis Courts	6	Courts	186	5	5	10	12	12	24
	<i>Subtotal</i>			<i>1,884</i>	<i>35</i>	<i>87</i>	<i>122</i>	<i>160</i>	<i>91</i>	<i>251</i>
Resort Colony	Res. Condominium/Townhouse	87	du	505	6	32	38	30	15	45
	High-Turnover (Sit-down) Restaurant ^c	15	ksf	1,907	90	83	173	99	69	168
	<i>Subtotal</i>			<i>2,412</i>	<i>96</i>	<i>115</i>	<i>211</i>	<i>129</i>	<i>84</i>	<i>213</i>

**TABLE 7-18 (Continued)
 ALTERNATIVE E TRIP GENERATION**

North Family Village	Single-Family Detached Housing	282	du	2,699	54	158	212	180	104	284
	Res. Condominium/Townhouse	135	du	784	9	50	59	47	23	70
	<i>Subtotal</i>			3,483	63	208	271	227	127	354
Urban Colony	Res. Condominium/Townhouse	700	du	4,067	49	259	308	245	119	364
	Shopping Center ^b	60	ksf	4,872	70	44	114	221	230	452
	<i>Subtotal</i>			8,939	119	303	422	466	349	816
Eastern Residential Colony	Res. Condominium/Townhouse	30	du	174	2	11	13	11	5	16
Total Before Internal Capture/Pass-By				16,892	315	724	1,039	993	656	1,650
Internal Capture^a				1,126				55	55	110
Pass-By Reduction for Retail (10%)^e								20	20	40
Total Alternative E Trips				15,766	315	724	1,039	918	581	1,500
Total Proposed Project Trips				14,989	251	655	906	866	564	1,430
du: dwelling unit; ksf: thousand square feet. a. Trip generation is based on ITE Land Use County Park (Land Use 412) because this category includes peak hour trip rates. b. Trip rates for Shopping Center are derived from the following regression equations: T = Trip Ends; X = units in ksf; ADT: $\text{LN}(T) = 0.65 \text{Ln}(X) + 5.83$; AM Peak Hour: $\text{Ln}(T) = 0.59 \text{Ln}(X) + 2.32$; PM Peak Hour: $\text{Ln}(T) = 0.67 \text{Ln}(X) + 3.37$ c. Trip generation is based on ITE land use 932 (High-Turnover Restaurant), a higher generator than shopping center. d. Source: Institute of Transportation Engineers (ITE) publication <i>Trip Generation Handbook</i> . See Internal Capture Worksheets in Appendix C of the Kimley-Horn Traffic Impact Analysis. e. Note: The ITE publication <i>Trip Generation Handbook</i> indicates pass-by for a shopping center is 34% in the PM peak hour. 10% is assumed here, for a conservative approach. Pass-by reduction is taken on balance of retail trips, after Internal Capture reduction Source: Kimley Horn 2011.										

When compared to the proposed Project, Alternative E would increase average daily trips by 777 trips, AM peak hour trips by 133 trips, and PM peak hour trips by 70 trips. The reallocation of 15,000 sf of the proposed retail uses from the Urban Colony to the Resort Colony would result in a redistribution of traffic. Moving the location of visitor-serving commercial uses to the Resort Colony from the Urban Colony would result in a redistribution of trips on the circulation network, with more trips using the southerly portion of Bluff Road as well as increased use of 15th Street easterly of the Project.

Intersection Levels of Service: Alternative E would be expected to have an increase in ADT and peak hour traffic volumes when compared to the proposed Project. However, this increase in peak hour volumes over the proposed Project traffic volumes is not anticipated to cause any of the intersections operating at an acceptable level of service with the Project to operate at an unacceptable level of service with this Alternative. Both Alternative E and the proposed Project would be expected to result in deficiencies at the intersection of Newport Boulevard at West Coast Highway in the City Newport Beach. The impact can be mitigated to a level considered less than significant with implementation of SC 4.9-3 and MM 4.9-1.

Both Alternative E and the proposed Project would be expected to significantly impact seven intersections in Costa Mesa: Newport Boulevard at 19th Street, Newport Boulevard at Harbor Boulevard, Newport Boulevard at 18th Street/Rochester Street, Newport Boulevard at

17th Street, Monrovia at 19th Street, Pomona Avenue at 17th Street, and Superior Avenue at 17th Street. Implementation of MM 4.9-2 would mitigate these impacts to a level considered less than significant. However, the City of Newport Beach cannot impose mitigation on another jurisdiction. Therefore, if the Applicant is unable to reach an agreement with the City of Costa Mesa that would ensure that Alternative E and proposed Project impacts occurring in Costa Mesa would be mitigated concurrent with or preceding the impact, for purposes of this EIR, the impacts to be mitigated by the improvements would remain significant and unavoidable.

Congestion Management Plan Intersection: Consistent with the findings for the proposed Project, Alternative E would not be expected to cause the intersection of Newport Boulevard at West Coast Highway to fall below the CMP LOS standards. Therefore, no significant impact would be expected to occur.

State Highway Intersections: Neither Alternative E nor the proposed Project would be expected to cause any State intersections to operate at a deficient LOS. No significant impact would be expected to occur.

Freeway Mainline Segments: Neither Alternative E nor the proposed Project would be expected to significantly impact any freeway segments.

Therefore with respect to Threshold 4.9-1, Alternative E would still be expected to cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume-to-capacity ratio on roads, or congestion at intersections). Both Alternative E and the proposed Project would significantly impact intersections in the traffic study area, some of which would remain unavoidable impacts because the City of Newport Beach cannot guarantee implementation of the Mitigation Program in Costa Mesa. This Alternative would not conflict with the CMP (Threshold 4.9-2). As with the proposed Project, Alternative E would not substantially increase hazards due to a design feature, incompatible land uses, or inadequate emergency access (Threshold 4.9-3). As with the proposed Project, Alternative E land uses would be required to provide adequate on-site parking. No parking impacts would occur (Threshold 4.9-4).

With respect to Threshold 4.9-5 which addresses consistency with transportation-related plans, policies, and regulations, both Alternative E and the proposed Project would require amendments to the City of Newport Beach General Plan Circulation Element's Master Plan of Streets and Highways and the Orange County Master Plan of Arterial Highways (MPAH). The same modifications to the roadway system are proposed for Alternative E and the proposed Project.

Air Quality

Alternative E would have less development than the proposed Project because there would be less developed area and no resort inn. However, the relocation of 15,000 sf of visitor-serving commercial would result in an approximate 5.2 percent increase in vehicle trips and VMT when compared to the proposed Project, with a similar increase of long-term vehicle emissions. This increase would add to the exceedances of the VOC and CO thresholds forecasted for the proposed Project post-2020.

Construction maximum daily emissions would be essentially the same as for the proposed Project, although the construction duration may be slightly less. The impacts described for the proposed Project would also be applicable to Alternative E. Regional (mass) emissions of NOx

are forecasted to exceed applicable thresholds in some construction years (Threshold 4.10-2). Localized concentrations of CO, NO₂, PM₁₀, and PM_{2.5} due to construction activities would not exceed the applicable thresholds (Threshold 4.10-2). The analysis of TAC emissions to both off-site and on-site receptors demonstrates that the cancer risk, the cancer burden, the chronic hazard risk and the acute hazard risk would be less than significant (Threshold 4.10-4), as would odors from construction and long-term operations (Threshold 4.10-5). However, since the relocation of some commercial uses would result in an approximate 5.2 percent increase in daily vehicle trips, there would be a similar increase in VMT compared to the proposed Project. As a result, the following significant and unavoidable impacts would occur:

- Without mitigation, regional (mass) emissions of NO_x are forecasted to exceed applicable thresholds in some construction years. Implementation of the Mitigation Program would reduce the emissions to less than significant. However, the availability of sufficient Tier 4 diesel engine construction equipment cannot be assured; thus the impact is potentially significant and unavoidable (Threshold 4.10-2).
- Long-term operational emissions of criteria pollutants would not exceed the SCAQMD mass emissions thresholds from initial occupancy through 2020. However, as Project development continues beyond 2020, emissions of VOC and CO would exceed the significance thresholds, principally due to vehicle operations (Threshold 4.10-2).
- Alternative E would have a significant cumulative air quality impact because its contribution to regional pollutant concentrations of O₃ would be cumulatively considerable (Threshold 4.10-3). Due to the increase VMT compared to the proposed Project, the impact would be incrementally greater.

As with the proposed Project, development would not exceed the assumptions used to develop the SCAQMD AQMPs, and Alternative E would not conflict with or obstruct implementation of the SCAQMD AQMPs (Threshold 4.10-1) or other applicable policies of agencies with jurisdiction over the project (Threshold 4.10-6).

Greenhouse Gas Emissions

Alternative E construction GHG emissions would be less than for the proposed Project because there would be less development area and no construction of the resort inn. Alternative E long-term GHG emissions would be greater than for the proposed Project because there would be an approximately 5.2 percent increase in vehicle trips, which would add more GHG emissions than the reduction of emissions anticipated with the elimination of the resort inn and reduced of electricity, natural gas, and water. The long-term GHG emissions with Alternative E would be substantially higher than the 6,000 MTCO₂e/yr significance threshold and would be a significant impact (Threshold 4.11-1), which is the same as the proposed Project.

Alternative E would not conflict with applicable plans, policies, or regulations adopted for the purpose of reducing GHG emissions; the impact would be less than significant (Threshold 4.11-2).

Noise

Construction noise impacts for Alternative E would be very similar to those for the proposed Project. There would be periodic, temporary, unavoidable significant noise impacts that would cease upon completion of construction activities (Threshold 4.12-2). The nature of the vibration impacts would be the same as for the proposed Project. Vibration may be noticeable for short periods during construction for both the proposed Project and Alternative E (Threshold 4.12-3).

Vibration is a potential concern when large bulldozers and vibration rollers are operating within ten feet from an existing residential structure. Therefore, neither the elimination of the resort inn nor the reduction in development area would not change the impact compared to the proposed Project.

The reallocation of the commercial use to the visitor-serving location as a replacement for the resort inn would result in an approximate 5.2 percent increase in project-generated vehicle trips. Therefore, because the roadway system for Alternative E is the same as for the proposed Project, it may be assumed that cumulative noise levels on existing roadways at General Plan buildout for Alternative E would be similar or slightly greater than those for the proposed Project with the greater increases on 15th Street east of the Project and nearby roadways. The noise level changes would be due to a combination of cumulative growth, a redistribution of traffic resulting from building of the Alternative E roads, and new trips generated by the development of residential, commercial, and park uses. Because most of the additional trip generation with Alternative E would occur on Bluff Road, the direct project contribution to a significant noise impact on 17th Street west of Monrovia Avenue that is forecasted for the proposed Project would be similar with Alternative E, and would result in a significant impact. As with the proposed Project, mitigation is proposed, but because these impacts would occur in the City of Costa Mesa and the City of Newport Beach cannot dictate mitigation outside its jurisdiction, it cannot be certain the mitigation would be implemented (Thresholds 4.12-1 and 4.12-4). There would be a significant noise impact on 15th Street, west of Monrovia Avenue in the *Existing Plus Project* and *2016 with Project* scenarios, but not in the *General Plan Buildout* scenario, which is the same as is forecasted for the proposed Project. The increase in total trip generation and a redistribution of traffic would result in an increase in traffic volumes on 15th Street; thus the impact would be slightly greater than the proposed Project. As with the proposed Project, the impact can be mitigated to less than significant.

The reallocation of 15,000 sf of commercial development for the resort inn would increase traffic on Bluff Road between West Coast Highway and 15th Street. With Alternative E at General Plan buildout, the future CNEL at the Newport Crest residences facing the Project site would increase from approximately 8 to 16 dBA above existing noise levels, which would be a significant noise impact. The noise increases would be less than 1 dBA CNEL greater than with the proposed Project because traffic volumes on Bluff Road would be greater than with the proposed Project. Noise abatement measures, including the construction of noise barriers to reduce exterior noise impacts, and noise insulation upgrades to further reduce interior noise impacts could reduce noise to a compatible level as defined for new development by the General Plan; however, the increase would still exceed the significance criterion. Future noise levels at the California Seabreeze and Parkview Circle residences would be the same or less with Alternative E than with the proposed Project and would be less than significant. It is likely that the noise levels would be less because commercial development at the nearby proposed Urban Colony would be reduced by 15,000 sf. Future noise levels at the Carden Hall School would be the same or very similar to those forecasted for the proposed Project; the impact would be less than significant (Thresholds 4.12-1 and 4.12-4), which is the same as the proposed Project.

Traffic noise levels to proposed internal land uses would be the same or very similar to those forecasted for the proposed Project, but slightly greater for development proposed adjacent to Bluff Road south of 15th Street. Noise-land use compatibility would be the same as for the proposed Project. Mitigation would be required to reduce traffic noise to proposed residential uses adjacent to roadways to achieve compatible noise levels required by the General Plan and the *California Code of Regulations* (Threshold 4.12-1).

Noise impacts from stationary sources associated with new residential and commercial development would be the same or very similar with Alternative E as with the proposed Project (Thresholds 4.12-1 and 4.12-4). Noise impacts from the possible drilling of new wells in the consolidated oilfield would be the same as for the proposed Project (Threshold 4.12-2). The Project site is not within an airport land use plan or near a private airstrip; therefore, there would be no impacts from excessive aircraft noise levels (Thresholds 4.12-5 and 4.12-6). Alternative E would be consistent with the goals and policies of the City of Newport Beach General Plan related to noise (Threshold 4.12-7).

Cultural and Paleontological Resources

Alternative E would result in on-site grading and development on the Project site but, without the resort inn component, they would not be to the same extent. Grading and excavation could impact unknown historical resources (Threshold 4.13-1). As discussed in Section 4.13, Cultural Resources, with implementation of the identified Mitigation Program, potentially significant impacts related to the cultural resources identified within the Project site would be reduced to a level considered less than significant, which is the same as the proposed Project.

Alternative E would impact known archaeological resources. Three archaeological sites (CA-ORA-839, CA-ORA-844B, and CA-ORA-906) are deemed eligible for listing in the CRHR and the NRHP. Disturbance activities could also impact unknown resources (Threshold 4.13-2), which is the same as the proposed Project.

Grading activities also have the potential to impact significant paleontological resources and unknown human remains, including those interred outside formal cemeteries (Threshold 4.13-3 and Threshold 4.13-4), which is the same as the proposed Project.

Alternative E would not conflict with applicable land use policies (Threshold 4.13-5). As with the proposed Project, this Alternative would be consistent with Land Use Element, Historic Resource Element, and Natural Resources Element goals and policies, which were outlined in Table 4.13-3, City of Newport Beach General Plan Consistency Analysis.

Public Services and Facilities

The public services and facilities evaluated in the EIR include the following: Fire Protection, Police Protection, Schools, Library Services, and Solid Waste. Alternative E would result in the same number of dwelling units as the proposed Project; however, no overnight accommodations (75-units resort inn) are proposed.

Because this Alternative would not include the resort inn component of the proposed Project; the associated demand for public services (fire protection, police protection) would be incrementally reduced compared to the proposed Project. As with the proposed Project, Site Planning Area 12b, the northerly block of Site Planning Area 10a, and the northerly block of Site Planning Area 10b cannot be served by Station Number 2 within the established response time, which is a significant impact. As with the proposed Project, implementation of the Mitigation Program would be required and potential impacts to fire protection service associated with Alternative E would be less than significant (Threshold 4.14-1).

The increase in demand for police protection services would not require new facilities or other environmental impacts in order to maintain acceptable levels of service (Threshold 4.14-3). Because the number of dwelling units would remain the same as the proposed Project, the demand for schools and library service (Thresholds 4.14-5 and 4.14-7) associated with

Alternative E would be the same as the proposed Project. The demand for solid waste services would be incrementally reduced because of the elimination of the resort inn (Threshold 4.14-9). The impacts to Thresholds 4.14-3, 4.14-5, 4.14-7, and 4.14-9 would be less than significant.

Thresholds 4.14-2, 4.14-4, 4.14-6, 4.14-8, and 4.14-10 pertain to consistency with any applicable plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. As with the proposed Project, this Alternative would meet the policies, which were outlined in Table 4.14-8, City of Newport Beach General Plan Consistency.

Utilities

This Alternative would not include the resort inn component of the proposed Project; therefore, the associated demand for utilities (water supply, wastewater facilities, and energy-electricity and natural gas) would be incrementally reduced compared to the proposed Project. However, the impacts associated with construction of new infrastructure for distribution of water and energy transmission would be the same for Alternative E, as for the proposed Project (Thresholds 4.15-1 and 4.15-7). From a water demand perspective, the impacts of Alternative E would be less than the proposed Project because there would be less development (Threshold 4.15-2).

Alternative E would generate less wastewater than the proposed Project because of the there would be no resort inn but would be required to comply with all the same regulations and wastewater treatment requirements as the proposed Project. Therefore, as with the proposed Project, impacts for Alternative E would be less than significant and slightly reduced when compared to those of the proposed Project (Thresholds 4.15-4 and 4.15-5).

Thresholds 4.15-3, 4.15-6, and 4.15-8 pertain to consistency with any applicable plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. As with the proposed Project, this Alternative would meet the policies, which were outlined in Table 4.15-11, City of Newport Beach General Plan Consistency.

Conclusion

Alternative E would reduce the development footprint by approximately 11 percent. Though the nature of the impacts would be the same as those discussed for the proposed Project, the impacts associated grading and project footprint would be incrementally smaller due to the reduced amount of disturbed area with Alternative E (i.e., impacts associated with grading, habitat removal, creation of impervious surfaces, construction air emissions). This Alternative would increase the overall VMT; therefore, there would be slightly greater long-term air emissions, noise, and traffic. It should be noted that while this Alternative increases public access and amenities over the existing condition and Alternatives A and B, this Alternative would not provide the same benefits (i.e., trails, Nature Center, parks, and pedestrian bridge) as compared to the proposed Project. Additionally, it would not provide overnight visitor accommodations, which is an important Coastal Act policy consideration.

Significant and Unavoidable Impacts

Alternative E would not eliminate any of the significant and unavoidable impacts identified with the proposed Project. The following significant and unavoidable impacts would occur with Alternative E:

- There would be land use incompatibility with respect to long-term noise impacts and night illumination on those Newport Crest residences immediately contiguous to the Project site. Noise impacts would remain significant if the residents of Newport Crest elect not to implement the mitigation measures to reduce the increased interior noise levels. Land use compatibility issues from night lighting associated with the Community Park would also be considered significant.
- Development would introduce new sources of light on the Project site, which would result in a significant visual impact.
- Alternative E would result in impacts to the same intersections as outlined for the proposed Project. Implementation of the Mitigation Program would reduce impacts to less than significant levels. However, the City of Newport Beach cannot guarantee implementation of necessary mitigation within another jurisdiction. Therefore, for purposes of this EIR, the impacts in the City of Costa Mesa intersections are assumed to remain significant and unavoidable.
- Without mitigation, regional (mass) emissions of NO_x are forecasted to exceed applicable thresholds in some construction years. Though MM 4.10-1 would reduce the emissions to less than significant, the availability of sufficient Tier 4 diesel engine construction equipment cannot be assured. Therefore, for purposes of this EIR, the impacts are found to be significant and unavoidable.
- Alternative E would have cumulatively considerable contributions to regional pollutant concentrations of O₃.
- Alternative E would emit quantities of GHGs that would exceed the City's 6,000 MTCO₂e/yr significance threshold. This would make a cumulatively considerable contribution to the global GHG inventory.
- For portions of the Newport Crest development, there would be a significant increase in the ambient noise level due to the projected traffic volumes in the buildout condition. MM 4.12-6 would reduce impacts to levels within the "Clearly Compatible" or "Normally Compatible" classifications, but would remain above the 5 dBA significance criterion in the General Plan. MM 4.12-7 would provide interior noise attenuation, but because the City of Newport Beach does not have the authority to mandate the implementation of mitigation on private property that is not on the Project site, the impact would be significant and unavoidable.
- The increased traffic volumes on 17th Street west of Monrovia Avenue would expose sensitive receptors to noise levels in excess of the City of Costa Mesa's standards. MM 4.12-5 requires the Applicant to provide funds to the City of Costa Mesa to resurface the street with rubberized asphalt; however, the City of Newport Beach has no control to assure that the mitigation would be implemented. Therefore, the forecasted impact to residents of 17th Street west of Monrovia Avenue is considered significant and unavoidable.
- Use of construction equipment would result in a substantial temporary increase in ambient noise levels to nearby noise-sensitive receptors in the vicinity of the Project. Due to the low existing ambient noise levels, the proximity of the noise-sensitive

receptors, and duration of construction activities, temporary noise increases would be significant and unavoidable.

Feasibility and Ability to Meet Project Objectives

This Alternative is potentially feasible. However, public benefits, coastal access and visitor-serving amenities would be reduced.

This Alternative is able to meet most of the Project objectives. However, it does not meet the objective of providing overnight visitor accommodations (Objective 4). In addition, it only partially meets the following objective:

- Provide enhanced public access through the Coastal Zone through a system of pedestrian walkways, multi-use trails, and on-street bikeways designed to encourage walking and biking as an alternative to the use of automobiles by providing connectivity among residential, commercial, park, open space, and resort uses within the Project site and to existing adjacent open space, hiking and biking trails, the beach, and the Pacific Ocean (Objective 8).

This Alternative provides the land uses identified in the General Plan, with the exception of the resort inn. This Alternative “feasibly attain[s] most of the basic objectives of the project” and may be considered to be a potentially feasible alternative.

7.5.6 ALTERNATIVE F: INCREASED OPEN SPACE/REDUCED DEVELOPMENT AREA

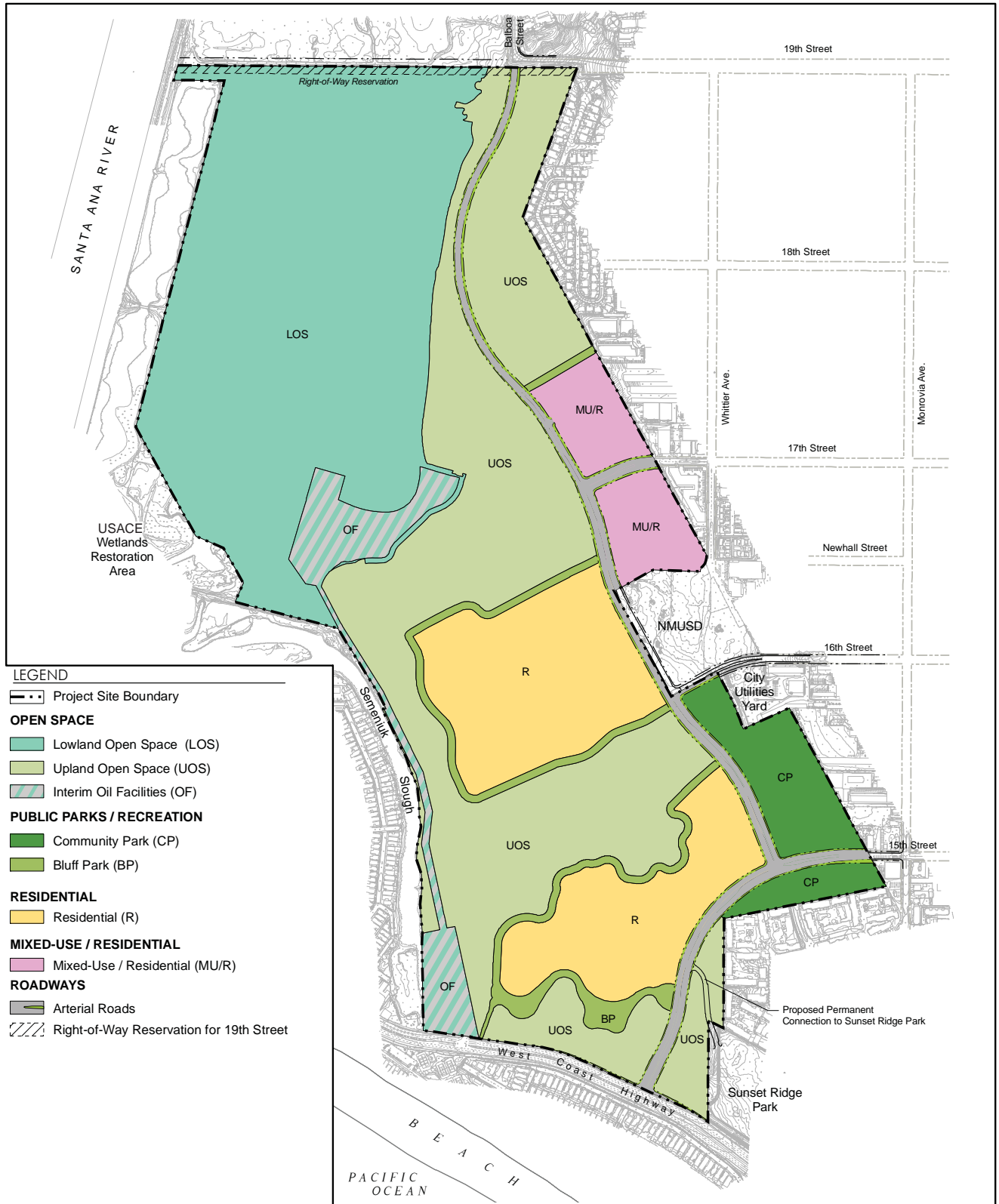
Description of the Alternative

Alternative F was developed to evaluate potential benefits associated with reducing the Project footprint and increasing open space while maintaining the overall number of residential units. This Alternative would result in an incremental reduction in impacts on natural resources because more area would be converted from oilfield operations to protected open space. Although impacts would be reduced, Alternative F would not avoid any of the significant impacts associated with the proposed Project.

Alternative F assumes the same number of residential units (1,375 du) as proposed by the Project within a reduced footprint. The development area (residential and commercial) would decrease from 97.4 gross acres to 84.0 gross acres, an approximate 14 percent reduction compared to the proposed Project. When parkland is factored in, the development footprint for Alternative F is reduced by 20 percent compared to the proposed Project. This Alternative does not include a resort inn or visitor-serving commercial uses. Residential units would be provided at a higher density and on smaller lots than assumed for the proposed Project. The same roadway system is proposed. Open space uses would increase from 252.3 gross acres to 282.4 gross acres. This Alternative does not include a Nature Center or interpretive trails; it provides 60,000 sf of neighborhood commercial uses (compared to 75,000 sf); and it would have approximately 34.7 acres of parks, including a 21.8-gross-acre Community Park (compared to approximately 51 total acres of parklands). As with the proposed Project, the Community Park would be constructed by the Applicant as part of this Alternative; it would be offered for dedication to the City; and upon acceptance, it would be maintained by the City. This Alternative does not assume a pedestrian and bicycle bridge spanning West Coast Highway.

Alternative F would require the same discretionary actions as noted for the proposed Project (also identified above under Alternative C). It is assumed that a Mitigation Program similar to what is proposed for the Project would be required for Alternative F. However, the Applicant has identified a number of design features (i.e., trails, Nature Center, and pedestrian bridge) that are amenities for the proposed Project that would not be incorporated in Alternative F.

Exhibit 7-9, Alternative F: Increased Open Space and Reduced Footprint, depicts the land use plan for Alternative F. Table 7-19 identifies the land uses and acreage associated with the allowable land uses. Similar to the other land use alternatives, the exhibit reflects the land uses that would be allowed, which is not the same as the limits of land disturbance; additional impacts would be associated with oilfield remediation, fuel modification, and any trails that ultimately are provided by other parties in open space.



Source: FORMA 2011

Alternative F: Increased Open Space/Reduced Footprint and 1,375 Dwelling Units, 60,000 SF Commercial

Exhibit 7-9

Newport Banning Ranch EIR



**TABLE 7-19
ALTERNATIVE F STATISTICAL SUMMARY**

Land Use District		Gross Acres ^a	Planned Dwelling Units	Maximum Permitted Commercial sf	Maximum Permitted Overnight Accommodations
Open Space					
LOS	Lowland Open Space ^b	130.6	–	–	–
UOS	Upland Open Space ^b	135.3			
OF	Interim Oil Facilities ^c	16.5	–	–	–
<i>Subtotal Open Space</i>		<i>282.4</i>	–	–	–
Public Parks/Recreation					
CP	Community Park	21.8	–	–	–
BP	Bluff Park ^d	12.9	–	–	–
<i>Subtotal Public Parks/Recreation</i>		<i>34.7</i>	–	–	–
Residential					
R	Residential (up to 14 DU/Ac) ^e	64.9	666	–	–
<i>Subtotal Residential</i>		<i>64.9</i>	<i>666</i>	–	–
Mixed-Use/Residential					
MU/R	Mixed-Use/Residential (up to 40 DU/Ac) ^e	19.1	709	60,000	–
<i>Subtotal Mixed-Use/Residential</i>		<i>19.1</i>	<i>709</i>	<i>60,000</i>	<i>0</i>
Total Project		401.1	1,375	60,000	0
<p>^a Gross acres are measured to centerlines of all public roads where such roads are shown on the plan. Gross acres are computed using geographic information system (GIS) technology with accuracy to 10 decimal places. Acres are shown in this table to one decimal place</p> <p>^b The Right-of-Way Reservation for the 19th Street Extension contains approximately 3.1 acres.</p> <p>^c Gross acres for the Bluff Park District may include fuel management zones and landscape focal points and greens.</p> <p>^d Gross acres for the Residential District and the Mixed-Use/Residential District may include fuel management zones, privately owned and maintained parks and recreational facilities, and landscape focal points and greens.</p> <p>^e The Interim Oil Facilities (Open Space Land Use) District includes: (1) the existing oil operations site near West Coast Highway; (2) the oil consolidation site near the middle of the Lowland; and (3) an oil access road (non-exclusive easement) connecting the two working sites.</p>					
Source: FORMA 2011.					

Comparative Analysis of Environmental Impacts

Land Use and Related Planning Programs

Alternative F assumes a similar development plan as the proposed Project without the overnight accommodations (75-room resort inn) and the visitor-serving commercial (15,000 sf) components. As previously described in Section 4.1.7 of Section 4.1, Land Use and Related Planning Programs, the Project site is surrounded by established communities of residential development and is an active oilfield. There are no other uses on site or public access to the site. Therefore, as with the proposed Project, Alternative F would not physically divide an established community (Threshold 4.1-1). However, as with the proposed Project, there would be land use incompatibility with respect to night illumination associated with the Community Park and long-term noise impacts on those Newport Crest residences immediately contiguous to the Project site. In addition, there would be a potential long-range noise impacts for residents on 17th Street west of Monrovia Avenue. For noise, though mitigation is proposed, noise impacts would remain significant if the residents of Newport Crest elect not to implement the mitigation

measures to reduce the increased interior noise levels and if the City of Costa Mesa does not implement the recommended measure of resurfacing the street with rubberized asphalt

Threshold 4.1-2 pertains to consistency with any applicable plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. This Alternative would generally be consistent with the land use policies outlined in Table 4.1-6, City of Newport Beach General Plan Consistency Evaluation. However, without the overnight accommodations and the visitor-serving components, this Alternative would not provide the visitor accommodations called for in the General Plan and Coastal Act or the level of job opportunities to the same extent as the proposed Project. Therefore, for this threshold, Alternative F would have greater impacts than the proposed Project.

Aesthetics and Visual Resources

The City does not have any designated scenic vistas, and West Coast Highway is not a State- or locally designated scenic highway. Therefore, similar to the proposed Project, Alternative F would not result in any impacts to this type of resource (Threshold 4.2-1).

The area with urban development (residential, commercial, and visitor-serving uses) for Alternative F would decrease from 97.4 gross acres under the proposed Project to 84.0 gross acres, a reduction in the development footprint of approximately 14 percent. When parkland is taken into consideration, the grading footprint is reduced by 20 percent and the earthwork quantities are expected to be reduced by 25 to 35 percent. Residential units would be provided at a higher density and on smaller lots than assumed for the proposed Project. The same roadway system is proposed, including North Bluff Road. Visual changes to the Project site associated with the implementation of Alternative F would be similar to those anticipated to occur under the proposed Project since the site would be converted from an active oilfield to a developed condition. The character of the Project site would change to a suburban environment, consistent with the surrounding uses. Because of the higher density and smaller lots than the proposed Project, potentially higher residential building heights may occur. However, this would not be expected to degrade the visual quality of the site based on its setting in an urban environment. Alternative F would have less of an aesthetic impact than the proposed Project because more area would be retained in open space and the amount of landform alteration would be reduced (Threshold 4.2-2).

Under both the proposed Project and this Alternative, significant and unavoidable impacts would occur with the creation of nighttime light. Because Alternative F would be developed with similar land uses, Alternative F would introduce new sources of light on the Project site—similar to the proposed Project—resulting in nighttime lighting in a currently unlit area. This increased nighttime lighting on the Project site is considered a significant and unavoidable impact (Threshold 4.2-3). A Statement of Overriding Considerations was adopted by the City Council for this impact as part of the certification of the General Plan EIR and General Plan project approval.

As with the proposed Project, Alternative F would be consistent with the intent of the aesthetic resources goals and policies of the *City of Newport Beach General Plan* and the California Coastal Act (Threshold 4.2-4).

Geology and Soils

Alternative F assumes the same land uses and similar development plan as the proposed Project without the overnight accommodations or the visitor-serving commercial components.

Alternative F reflects a more substantial reduction in the proposed development area and, as a result, the anticipated earthwork quantities would be reduced. The majority of the reduced footprint is in the proposed residential areas of the north and south family villages. These areas on the Project site have proportionately greater amounts of mass grading and corrective grading. As a result, qualitatively, the 20 percent reduction in the grading footprint would result in an estimated reduction in the range of 25 to 35 percent in the mass grading and corrective grading quantities. Additionally the maximum fill slope of 60 feet would not apply under this Alternative.

As indicated in Section 4.3, Geology and Soils, the Project site is located in a seismically active area with faults within the proposed development site that could not be proven to be inactive (Threshold 4.3-1). Alternative F proposes fewer structures (no resort inn and visitor-serving commercial) than the proposed Project. Although development would be exposed to the same potential for impacts associated with surface fault rupture and seismic shaking (Threshold 4.3-2) because of the reduced footprint without the overnight accommodations and visitor-serving commercial, Alternative F would expose fewer people and structures to impacts associated with these thresholds; therefore, Alternative F would have incrementally fewer impacts than the proposed Project.

As indicated in Section 4.3, Geology and Soils, two fault segments on the Project site have not been confirmed as inactive and development setbacks have been recommended. The fault setback zones would reduce the risk of surface fault rupture. As with the proposed Project, Alternative F would be required to incorporate strengthened building foundations and structural design, which would accommodate strong seismic shaking on the Project site. Habitable structures would be restricted to the Upland area, avoiding soils that may liquefy or undergo lateral spreading and, where necessary, corrective grading would ensure all structures are placed on competent foundation materials. As with the proposed Project, Alternative F would not result in significant impacts from seismic-related ground failure, liquefaction, lateral spreading, soil collapse, or landslides (Thresholds 4.3-3 and 4.3-6). As with the proposed Project, Alternative F would be subject to some existing on-site potential for landslides under dynamic seismic conditions. Consistency with the CBC, City building code requirements, and General Plan policies along with the incorporation of bluff setback zones would ensure that impacts associated with on- and off-site landslides would be less than significant (Threshold 4.3-4). Because of the reduced footprint, without the overnight accommodations and visitor-serving commercial, Alternative F would expose fewer people and structures to impacts associated with these thresholds; therefore, Alternative F would have fewer impacts than the proposed Project.

As with the proposed Project, grading activities associated with Alternative F would increase the potential for soil erosion and loss of topsoil (Threshold 4.3-5). With the incorporation of construction BMPs as described in Section 4.4, Hydrology and Water Quality, impacts on soil erosion and loss of topsoil would be less than significant. Post-construction soil erosion and the loss of topsoil would be minimized through the use of engineered grading, surface drainage improvements, and landscaping. This Alternative would require less grading; therefore, impacts associated with this threshold would be less than the proposed Project.

On-site soils have a low to medium expansion potential. As with the proposed Project, incorporation of SCs 4.3-1 through 4.3-3 and MMs 4.3-1 and 4.3-2, would reduce impacts from this Alternative associated with expansive soils to a less than significant level (Threshold 4.3-7). Because of the reduced footprint and reduction in dwelling units, Alternative F would expose fewer people and structures to impacts associated with these thresholds; therefore, impacts under Alternative F would be less than the proposed Project.

Alternative F would be consistent with the intent of the soils and geology-related goals and policies of the City of Newport Beach General Plan and the California Coastal Act (Threshold 4.3-8), which is the same as the proposed Project.

Hydrology and Water Quality

Alternative F would result in on-site grading and development on the Project site. However, this Alternative would reduce the development area (exclusive of parks and open space) by approximately 14 percent compared to the proposed Project. As with the proposed Project, Alternative F would result in an increase in impervious surfaces, although to a lesser degree than the proposed Project, and would increase the amount of runoff and the concentration of pollutants in storm water runoff (Thresholds 4.4-1, 4.4-6, 4.4-11, 4.4-12, and 4.4-13). Implementation of the Mitigation Program in Section 4.4.7 of the EIR would ensure that these impacts would be reduced to a less than significant level. However, when compared to the proposed Project, Alternative F would result in incrementally fewer impacts.

The proposed Project would result in an increase in impervious surface and would reduce the potential for groundwater percolation (Threshold 4.4-2); implementation of treatment-control BMPs and LID features would ensure that Project impacts would be less than significant. Since Alternative F would have less impervious surface than the proposed Project, potential impacts to groundwater would be less than the proposed Project. This impact would be less than significant.

This Alternative would involve changes to existing drainage patterns and would cause increases in erosion of the Project site or surrounding areas that would occur with the proposed Project (Thresholds 4.4.3 and 4.4-15). Implementation of the Mitigation Program in Section 4.4.7 of the EIR would ensure that these impacts would be reduced to a less than significant level. However, when compared to the proposed Project, Alternative F would result in fewer impacts. These impacts would be less than significant.

Alternative F would result in increases in impervious surfaces, in peak flow runoff, and in runoff volumes from the site (Thresholds 4.4-4 and 4.4-14); it would also affect the capacity of existing or planned storm water drainage systems (Threshold 4.4-5). Implementation of the Mitigation Program in Section 4.4.7 of the EIR section would ensure that impacts related to on-site or downstream flooding would be considered less than significant. However, when compared to the proposed Project, Alternative F would result in fewer impacts. These impacts would be less than significant.

As with the proposed Project, housing associated with Alternative F would be located on the Upland at elevations well outside the 100-year floodplain. There would be no impacts to or from the 100-year floodplain for both the proposed Project and Alternative F (Thresholds 4.4-7 and 4.4-8).

The Project site is located at the lower end of the watershed and is not located within any dam inundation areas. As with the proposed Project, housing associated with Alternative F would be located on the Upland and people and/or structures would not be exposed to significant risk associated with the failure of a levee or dam (Threshold 4.4-9). Potential impacts associated with Threshold 4.4-9 would be less than significant for both the proposed Project and Alternative F.

There are no permanent standing water bodies in the Upland area and inundation by tsunami is not likely because of Project site elevations and the City's existing Emergency Management

Plan. Therefore, as with the proposed Project, inundation by seiche, tsunami, or mudflow is not likely for this Alternative (Threshold 4.4-10).

Alternative F would not conflict with applicable land use policies (Threshold 4.4-16). As with the proposed Project, this Alternative would be consistent with the Harbor and Bay Element, Natural Resources Element, and Safety Element goals and policies, which were outlined in Table 4.4-25, City of Newport Beach General Plan Consistency Evaluation, and the relevant California Coastal Act policies which were outlined in Table 4.4-26, California Coastal Act Consistency Analysis.

Hazards and Hazardous Materials

As discussed in Section 4.5, Hazards and Hazardous Materials, with implementation of the identified Mitigation Program, potentially significant impacts related to the historical and continuing oil operations on the Project site and the potential presence of ACMs and LBP in some structures would be reduced to a level considered less than significant. Alternative F would result in on-site grading and development on the Project site. While this Alternative would result in a reduced site development area, compared to the proposed Project, this reduction would not affect the need for or implementation of the final RAP identified in the Mitigation Program. This Alternative would require implementation of the final RAP (identified in the Mitigation Program), including consolidation of oilfield activities. Therefore, like the proposed Project and with implementation of the Mitigation Program this Alternative would result in less than significant impacts related to Thresholds 4.5-1 and 4.5-2, which pertain to the creation of hazards associated with the transport, use, disposal and/or emissions of hazardous materials and location on an identified hazardous materials site.

Both the construction and operational characteristics of Alternative F would be similar to the proposed Project. The long-term operation of the development would not emit hazardous emissions within ¼ mile of a school site. However, Alternative F may have slightly less impact than the proposed Project because it would reduce the amount of grading by 25 to 35 percent, which potentially reduces the amount of soil from remediation activities that may have to be hauled off site. Haul routes may be established on streets that pass existing schools. Implementation of standard conditions would provide for impacts to be considered less than significant (Threshold 4.5-3).

The Project site is not identified on the Cortese List which is compiled pursuant to Section 65962.5 of the *California Government Code*. Therefore, there would be no impact associated with Threshold 4.5-4.

Threshold 4.5-5 pertains to consistency with any applicable plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Alternative F would not conflict with applicable land use, harbor and bay, natural resource, or safety policies because it would provide for the consolidation of oilfield activities and remediation of the site, which is the same as the proposed Project. The policies, which were outlined in Table 4.5-5, City of Newport Beach General Plan Consistency Evaluation, call for prohibiting new oil and gas extraction activities; consolidating and/or relocating existing oil operations; limiting hazards associated with oil operations; and remediating soil and groundwater contamination. This Alternative would be consistent with provisions of the General Plan.

Biological Resources

Alternative F would include the primary features of the proposed Project, but assumes a reduction in the development acreage.

Alternative F would reduce the development area by approximately 14 percent compared to the proposed Project; therefore, corresponding impacts to biological resources are expected to be similar. Alternative F would result in a substantial adverse effect on special status plant and wildlife species; this is similar to, but less than, the proposed Project (Threshold 4.6-1). As discussed in Section 4.6, Biological Resources, with implementation of the identified Mitigation Measures, potentially significant impacts to special status species from Alternative F would be reduced to a level considered less than significant.

This Alternative would have a substantial adverse effect on riparian habitat (woodland/scrub habitats and marsh areas) and other sensitive natural communities (e.g., coastal sage scrub) (Thresholds 4.6-2 and 4.6-3). Although these impacts are expected to be less than the proposed Project because of the reduced development area, they are still considered significant. As discussed in Section 4.6, Biological Resources, with implementation of the identified Mitigation Measures, potentially significant impacts to special status habitats from Alternative F would be reduced to a level considered less than significant.

The area to be developed is highly disturbed due to the oilfield operations and is primarily limited to the upland area, which would reduce the habitat available for species moving along the Santa Ana River and those using the upland portions of the Project site as a migration stopover point. Impacts to wildlife migration corridors would be incrementally less for Alternative F than for the proposed Project because it proposes a smaller footprint; however, this impact would be considered significant (Threshold 4.6-4). As discussed in Section 4.6, Biological Resources, with implementation of the identified Mitigation Measures, these potentially significant impacts would be reduced to a level considered less than significant.

Because Alternative F would reduce the impacts to biological resources, the amount of acreage that would be restored in compliance with mitigation measures imposed on the Project as conditions of approvals and permits within the Lowland Open Space Preserve would be expected to be less than the proposed Project. Any acreage to be restored after fulfilling mitigation requirements and requiring restoration would be placed in a reserve area (mitigation bank) or similar mechanism and may be made available to third parties seeking off-site areas in which to fulfill their respective mitigation obligations. The area would be restored in accordance with the Habitat Restoration Plan. One area that is contemplated for inclusion in a mitigation bank is the land proposed for use for the consolidated oil operations. Upon cessation of oil production operations, these two Oil Consolidation sites would be remediated and could be available in a reserve area.

This Alternative would also not conflict with any local policies or ordinances protecting biological resources or provisions of an adopted Habitat Conservation Plan; Natural Community Conservation Plan; or other approved local, regional, or State habitat conservation plan (Threshold 4.6-5), which is the same as the proposed Project.

Population, Housing, and Employment

Long-range plans assume approximately 36 percent of the projected population growth and 25 percent of the projected employment growth in the City would be accommodated on the Newport Banning Ranch site for the 25-year period between 2010 and 2035. Alternative F

would be consistent with the population assumptions and would have the same residential population as the proposed Project (Threshold 4.7-1). This Alternative would provide the same commitment to affordable housing as the proposed Project, and it would not require intensification of development elsewhere in the City to meet the RHNA requirements.

Alternative F would be consistent with most of the applicable planning programs; however, it would not provide the visitor commercial uses called for in the General Plan. This Alternative would create long-term employment opportunities; however, without the overnight accommodations and visitor-serving commercial components and it would not help balance the employment demands associated with the City's population to same extent as the proposed Project (Threshold 4.7-2).

Recreation and Trails

Alternative F assumes both a reduction in the amount of development that would occur on the Project site and a reduction the acreage associated with that development. With Alternative F, residential units would be provided at a higher density and on smaller lots than assumed for the proposed Project. Compared to the proposed Project, there would be a reduction on the amount of parkland from approximately 51 acres to approximately 34.7 acres, but it would still include a 21.8-gross-acre Community Park. As with the proposed Project, the Community Park would be constructed by the Applicant as part of this Alternative; it would be offered for dedication to the City; and upon acceptance, it would be maintained by the City. Alternative F also would provide a 12.9-gross acre Bluff Park, which would be in addition to the Community Park. As with Alternatives D and E, this Alternative does not include a Nature Center or interpretive trails. However, under Alternative F open space uses would increase from 252.3 gross acres with the proposed Project to 282.4 gross acres. This Alternative does not include a pedestrian and bicycle bridge spanning West Coast Highway. While there is a reduction in development on the Project site, the similar types of land uses would still be developed (residential and commercial); however, the resort inn and visitor-serving commercial uses would not be constructed under this Alternative. Alternative F would increase the demand for park and recreational facilities similar to that of the proposed Project. While this Alternative does not offer the same amenities or number of amenities, less than significant impacts would result with respect to recreation because sufficient parkland would be provided to meet the needs of the Alternative (Thresholds 4.8-1, 4.8-2, and 4.8-3). However, since this Alternative does not provide the recreational amenities of the proposed Project, which proposes 51.4 acres of parkland and a trail network.

Alternative F would be consistent with the intent of the recreational resources goals and policies of the *City of Newport Beach General Plan* and the California Coastal Act (Threshold 4.2-4). However, because this Alternative would provide few trails and would not construct the pedestrian/bike overcrossing, it would provide less public access opportunities than the proposed Project from a Coastal Act policy perspective. Therefore, it would not meet the recreational goals as effectively as the proposed Project would.

Transportation and Circulation

Alternative F assumes the same arterial roadway network as the proposed Project. It assumes the same number of residential units as the proposed Project but with a slightly different distribution of the units. The resort inn would be eliminated and there would be a reduction of commercial uses. The commercial use in the Urban Colony would decrease from 75,000 sf to 60,000 sf.

The trip generation associated with Alternative F is provided in Table 7-20. Alternative F would generate 13,645 ADT, with 849 AM peak hour trips and 1,305 PM peak hour trips. When compared to the proposed Project, Alternative F would decrease average daily trips by 1,344 trips, AM peak hour trips by 57 trips, and PM peak hour trips by 125 trips. The reduction of 15,000 sf of the proposed retail uses from the Urban Colony would change the overall ADT and peak hour trip generation and would result in a reduction of traffic focused primarily on the use of 17th Street easterly of the Project site.

Intersection Levels of Service

Alternative F would be projected to result in a decrease in ADT and peak hour traffic volumes when compared to the proposed Project. This decrease in peak hour volumes would not cause any of the intersections operating at an acceptable LOS with the Project to operate at an unacceptable LOS with Alternative F. Both Alternative F and the proposed Project would be expected to result in deficiencies at the intersection of Newport Boulevard at West Coast Highway in the City Newport Beach. The impact can be mitigated to a level considered less than significant with the implementation of SC 4.9-3 and MM 4.9-1.

Both Alternative F and the proposed Project would significantly impact seven intersections in Costa Mesa: Newport Boulevard at 19th Street, Newport Boulevard at Harbor Boulevard, Newport Boulevard at 18th Street/Rochester Street, Newport Boulevard at 17th Street, Monrovia at 19th Street, Pomona Avenue at 17th Street, and Superior Avenue at 17th Street. Implementation of MM 4.9-2 would mitigate the impact to a level considered less than significant. However, the City of Newport Beach cannot impose mitigation on another jurisdiction. Therefore, if the Applicant is unable to reach an agreement with the City of Costa Mesa that would ensure that Alternative F and proposed Project impacts occurring in Costa Mesa would be mitigated concurrent with or preceding the impact, for purposes of this EIR, the impacts to be mitigated by the improvements would remain significant and unavoidable.

Congestion Management Plan Intersection: Consistent with the findings for the proposed Project, Alternative F would not be expected to cause the intersection of Newport Boulevard at West Coast Highway to fall below the CMP LOS standards. Therefore, no significant impact would be expected to occur.

State Highway Intersections: Neither Alternative F nor the proposed Project would be expected to cause any State intersections to operate at a deficient level of service. No significant impact would be expected to occur.

Freeway Mainline Segments: Neither Alternative F nor the proposed Project would be expected to significantly impact any freeway segments.

**TABLE 7-20
 ALTERNATIVE F TRIP GENERATION**

Trip Rates										
Land Use	ITE Code	Trips per	Trip Generation Rates							
			Daily	AM Peak Hour			PM Peak Hour			
				In	Out	Total	In	Out	Total	
Single-Family Detached Housing	210	du	9.57	0.19	0.56	0.75	0.64	0.37	1.01	
Residential Condominium/Townhouse	230	du	5.81	0.07	0.37	0.44	0.35	0.17	0.52	
Park ^a	412	acre	2.28	0.01	0.00	0.01	0.02	0.04	0.06	
Soccer Complex	488	Field	71.33	0.70	0.70	1.40	14.26	6.41	20.67	
Tennis Courts	490	Court	31.04	0.84	0.84	1.68	1.94	1.94	3.88	
Shopping Center ^b	820	ksf	Equation - See Below							
Project Trip Generation										
Project Area	Land Use	Units	Trips per	Trip Generation						
				Daily	AM Peak Hour			PM Peak Hour		
					In	Out	Total	In	Out	Total
South Family Village	Single-Family Detached Housing	141	du	1,349	27	79	106	90	52	142
	Park	28	acre	64	0	0	0	1	1	2
	Soccer Complex	4	Fields	285	3	3	6	57	26	83
	Tennis Courts	6	Courts	186	5	5	10	12	12	24
	<i>Subtotal</i>			1,884	35	87	122	160	91	251
Resort Colony	Res. Condominium/Townhouse	165	du	959	12	61	73	58	28	86
	<i>Subtotal</i>			959	12	61	73	58	28	86
North Family Village	Single-Family Detached Housing	225	du	2,153	43	126	169	144	83	227
	Res. Condominium/Townhouse	135	du	784	9	50	59	47	23	70
	<i>Subtotal</i>			2,937	52	176	228	191	106	297
Urban Colony	Res. Condominium/Townhouse	679	du	3,945	48	251	299	238	115	353
	Shopping Center ^b	60	ksf	4,872	70	44	114	221	230	452
	<i>Subtotal</i>			8,817	118	295	413	459	345	805
Eastern Residential Colony	Res. Condominium/Townhouse	30	du	174	2	11	13	11	5	16
Total Before Internal Capture/Pass-By				14,771	219	630	849	879	575	1,455
Internal Capture^c				1,126				55	55	110
Pass-By Reduction for Retail (10%)^d								20	20	40
Total Alternative F Trips				13,645	219	630	849	804	500	1,305
Total Proposed Project Trips				14,989	251	655	906	866	564	1,430
du: dwelling unit; ksf: 1,000 square feet a. Trip generation is based on ITE Land Use County Park (Land Use 412) because this category includes peak hour trip rates. b. Trip rates for Shopping Center are derived from the following regression equations: T = Trip Ends, X = units in ksf ADT: $\ln(T) = 0.65 \ln(X) + 5.83$ AM Peak Hour: $\ln(T) = 0.59 \ln(X) + 2.32$ PM Peak Hour: $\ln(T) = 0.67 \ln(X) + 3.37$ c. Source: Institute of Transportation Engineers (ITE) publication <i>Trip Generation Handbook</i> . See Internal Capture Worksheets in Appendix C of the Kimley-Horn Traffic Impact Analysis. d. Note: The ITE publication <i>Trip Generation Handbook</i> indicates pass-by for a shopping center is 34% in the PM peak hour. 10% is assumed here, for a conservative approach. Pass-by reduction is taken on balance of retail trips, after Internal Capture reduction Source: Kimley-Horn 2011.										

With respect to Threshold 4.9-1, Alternative F would still be expected to cause an increase in traffic that is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume-to-capacity ratio on roads, or congestion at intersections), both Alternative F and the proposed Project would significantly impact intersections in the traffic study area, some of which would remain significant and unavoidable impacts because the City of Newport Beach cannot guarantee implementation of the Mitigation Program in Costa Mesa. This Alternative would not conflict with the CMP (Threshold 4.9-2). As with the proposed Project, Alternative F would not substantially increase hazards due to a design feature, incompatible land uses, or inadequate emergency access (Threshold 4.9-3). As with the proposed Project, Alternative F land uses would be required to provide adequate on-site parking. No parking impacts would occur (Threshold 4.9-4).

With respect to Threshold 4.9-5, which addresses consistency with transportation-related plans, policies, and regulations, both Alternative F and the proposed Project would require amendments to the City of Newport Beach General Plan Circulation Element's Master Plan of Streets and Highways and the Orange County MPAH. The same modifications to the roadway system are proposed for Alternative F and the proposed Project.

Air Quality

Alternative F would have less development than the proposed Project because there would be less developed area, no resort inn, or visitor-serving commercial. Construction maximum daily emissions would be essentially the same as for the proposed Project, although the construction duration may be slightly less. As described for the proposed Project, regional (mass) emissions of NO_x are forecasted to exceed applicable thresholds in some construction years (Threshold 4.10-2). Localized concentrations of CO, NO₂, PM₁₀, and PM_{2.5} due to construction activities would not exceed the applicable thresholds (Threshold 4.10-2). The analysis of TAC emissions to both off-site and on-site receptors demonstrates that the cancer risk, the cancer burden, the chronic hazard risk, and the acute hazard risk would be less than significant (Threshold 4.10-4), as would odors from construction and long-term operations (Threshold 4.10-5). The elimination of the resort inn and visitor-serving commercial uses from the proposed Project would result in an approximate nine percent decrease in vehicle trips and VMT, with a similar decrease of long-term vehicle emissions compared to the proposed Project. The reduction in VMT would not change the impact conclusions. As a result, the following significant and unavoidable impacts would occur:

- Without mitigation, regional (mass) emissions of NO_x are forecasted to exceed applicable thresholds in some construction years. Implementation of the Mitigation Program would reduce the emissions to less than significant. However, the availability of sufficient Tier 4 diesel engine construction equipment cannot be assured; thus the impact is potentially significant and unavoidable (Threshold 4.10-2).
- Long-term operational emissions of criteria pollutants would not exceed the SCAQMD mass emissions thresholds from initial occupancy through 2020. However, as Project development continues beyond 2020, emissions of VOC and CO would exceed the significance thresholds, principally due to vehicle operations (Threshold 4.10-2).
- The Project would have a significant cumulative air quality impact because its contribution to regional pollutant concentrations of O₃ would be cumulatively considerable (Threshold 4.10-3).

As with the proposed Project, development would not exceed the assumptions used to develop the SCAQMD AQMPs and Alternative F would not conflict with or obstruct implementation of the SCAQMD AQMPs (Threshold 4.10-1) or other applicable policies of agencies with jurisdiction over the project (Threshold 4.10-6).

Greenhouse Gas Emissions

Alternative F construction GHG emissions would be less than those for the proposed Project because there would be less development area and no construction of the resort inn or visitor-serving commercial uses. Alternative F long-term GHG emissions would be less than for the proposed Project because there would be an approximate nine percent reduction in vehicle trips and less consumption of electricity, natural gas, and water. However, long-term GHG emissions with Alternative F would be substantially higher than the 6,000 MTCO₂e/yr significance threshold and would be a significant impact (Threshold 4.11-1). The cumulative GHG emission impacts of this Alternative would be less than the proposed Project.

Alternative F would not conflict with applicable plans, policies, or regulations adopted for the purpose of reducing GHG emissions; the impact would be less than significant (Threshold 4.11-2).

Noise

There would be periodic, temporary, unavoidable significant noise impacts that would cease upon completion of construction activities (Threshold 4.12-2). Vibration impacts under Alternative F would be the same as for the proposed Project (Threshold 4.12-3). Therefore, neither the elimination of the resort inn nor the reduction in development area would change the impact compared to the proposed Project.

The elimination of the resort inn and visitor-serving commercial uses from the proposed Project would result in an approximate nine percent reduction in daily project-generated vehicle trips with similar decreases in AM and PM peak hour trips. Because the roadway system for Alternative F is the same as for the proposed Project, it may be assumed that cumulative noise levels on existing roadways at General Plan buildout for Alternative F would be slightly less (less than 0.5 dBA) than those for the proposed Project. The noise level changes would be due to a combination of cumulative growth, a redistribution of traffic resulting from building of the Alternative F roads, and new trips generated by development of residential, commercial, and park uses. There would be a significant noise impact on 17th Street west of Monrovia Avenue. As with the proposed Project, mitigation is proposed, but because these impacts would occur in the City of Costa Mesa and the City of Newport Beach cannot require mitigation outside its jurisdiction, the City of Newport Beach cannot be certain the mitigation would be implemented (Thresholds 4.12-1 and 4.12-4). There would also be a significant noise impact on 15th Street, west of Monrovia Avenue in the *Existing Plus Project* and *2016 with Project* scenarios, but not in the *General Plan Buildout* scenario, which is the same as is forecasted for the proposed Project. As with the proposed Project, the impact can be mitigated to less than significant.

With Alternative F at General Plan buildout, future CNEL at the Newport Crest residences facing the Project site would increase from approximately 8 to 16 dBA above existing noise levels, which would be a significant noise impact; however, due to decreased trip generation, noise levels would be slightly less than with the proposed Project. Noise-abatement measures—including the construction of noise barriers to reduce exterior noise impacts and upgrades for windows on the facades of homes facing Bluff Road to reduce interior noise impacts—could reduce noise to a compatible level as defined for new development by the General Plan.

However, as with the proposed Project, from a CEQA perspective, the interior noise impacts on the first row of units in Newport Crest facing Newport Banning Ranch would remain a significant and unavoidable impact because the City of Newport Beach does not have the authority to mandate the implementation of mitigation on private property that is not on the Project site. Future noise levels at the California Seabreeze and Parkview Circle residences would be the same or less with Alternative F than with the proposed Project and would be less than significant. Future noise levels at the Carden Hall School would be the same or less to those forecasted for the proposed Project; the impact would be less than significant (Thresholds 4.12-1 and 4.12-4), which is less than the proposed Project.

Traffic noise levels to proposed land uses (internal to the development) would be the same or less than those forecasted for the proposed Project. Noise land use compatibility would be the same as for the proposed Project. Mitigation would be required to reduce traffic noise to proposed residential uses adjacent to roadways to achieve compatible noise levels required by the General Plan and the *California Code of Regulations* (Threshold 4.12-1).

Noise impacts from stationary sources associated with new residential and commercial development would be the same or very similar with Alternative F as with the proposed Project (Thresholds 4.12-1 and 4.12-4). Noise impacts from the possible drilling of new wells in the consolidated oilfield would be the same as for the proposed Project (Threshold 4.12-2). Since the Project site is not within an airport land use plan or near a private airstrip, there would be no impacts from excessive aircraft noise levels (Thresholds 4.12-5 and 4.12-6). Alternative F would be consistent with the goals and policies of the City of Newport Beach General Plan related to noise (Threshold 4.12-7).

Cultural and Paleontological Resources

Alternative F would result in on-site grading and development on the Project site but not to the same extent because of the reduced development area and without the resort inn and visitor-serving commercial components. Grading and excavation could impact unknown historical resources (Threshold 4.13-1). As discussed in Section 4.13, Cultural Resources, with implementation of the identified Mitigation Program, potentially significant impacts related to the cultural resources identified within the Project site would be reduced to a level considered less than significant, which is the same as the proposed Project.

Alternative F would impact known archaeological resources. Three archaeological sites (CA-ORA-839, CA-ORA-844B, and CA-ORA-906) are deemed eligible for listing in the CRHR and the NRHP. Disturbance activities could also impact unknown resources (Threshold 4.13-2), which is the same as the proposed Project.

Grading activities also have the potential to impact significant paleontological resources and unknown human remains, including those interred outside formal cemeteries (Threshold 4.13-3 and Threshold 4.13-4), which is the same as the proposed Project.

Alternative F would not conflict with applicable land use policies (Threshold 4.13-5). As with the proposed Project, this Alternative would be consistent with the Land Use Element, Historic Resource Element, and Natural Resources Element goals and policies, which were outlined in Table 4.13-3, City of Newport Beach General Plan Consistency Analysis.

Public Services and Facilities

The public services and facilities evaluated in the EIR include the following: fire protection, police protection, schools, library services, and solid waste. Alternative F would result in the same number of dwelling units as the proposed Project; however, no overnight accommodations (75-room resort inn) or visitor-serving commercial components are proposed.

Because this Alternative would not include the resort inn or visitor-serving commercial components of the proposed Project, the associated demand for public services (fire protection, police protection) would be reduced compared to the proposed Project. Additionally a portion of Site Planning Area 12b, the northerly block of Site Planning Area 10a, and the northerly block of Site Planning Area 10b that cannot be served by Station Number 2 within the established response time, is not proposed for development. Therefore, the impact would be less with Alternative F than with the proposed Project. However, implementation of the Mitigation Program would be still required to reduce potential impacts to fire protection service associated with Alternative F to less than significant (Threshold 4.15-1).

The increase in demand for police protection services would not require new facilities or other environmental impacts in order to maintain acceptable levels of service (Threshold 4.14-3). Because the number of dwelling units would remain the same as the proposed Project, the demand for schools and library service (Thresholds 4.14-5 and 4.14-7) associated with Alternative F would be the same as (library) and/or similar to the proposed Project (schools). The School District has different generation rates for single-family detached, single-family attached, and multi-family units. Upon final determination of the number of single-family attached or single-family detached units are provided, the student generation could be slightly less with more attached than detached units. The demand for solid waste services would be incrementally reduced because of the elimination of the resort inn (Threshold 4.14-9). The impacts to Thresholds 4.14-3, 4.14-5, 4.14-7, and 4.14-9 would be less than significant.

Thresholds 4.14-2, 4.14-4, 4.14-6, 4.14-8, and 4.14-10 pertain to consistency with any applicable plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. As with the proposed Project, this Alternative would meet the policies, which were outlined in Table 4.14-8, City of Newport Beach General Plan Consistency.

Utilities

This Alternative would not include the resort inn or the visitor-serving commercial components of the proposed Project; therefore, the associated demand for utilities (water supply, wastewater facilities, and electricity and natural gas) would be reduced compared to the proposed Project. However, the impacts associated with construction of new infrastructure for distribution of water and energy transmission would be the same for Alternative F, as for the proposed Project (Thresholds 4.15-1 and 4.15-7). From a water demand perspective, the impacts of Alternative F would be less than the proposed Project because there would be less development (Threshold 4.15-2).

Alternative F would generate less wastewater than the proposed Project because of the reduced development and would be required to comply with all the same regulations and wastewater treatment requirements as the proposed Project. Therefore, as with the proposed Project, impacts for Alternative F would be less than significant and slightly reduced compared to the proposed Project (Thresholds 4.15-4 and 4.15-5). The impacts to Thresholds 4.15-1, 4.15-2, 4.15-4, 4.15-5, and 4.15-7 would be less than significant.

Thresholds 4.15-3, 4.15-6, and 4.15-8 pertain to consistency with any applicable plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. As with the proposed Project, this Alternative would meet the policies, which were outlined in Table 4.15-11, City of Newport Beach General Plan Consistency.

Conclusion

Alternative F would reduce the development footprint (area used for urban development and parkland) by approximately 20 percent. Although the nature of the impacts would be the same as those discussed for the proposed Project, the overall impacts associated with Alternative F would be fewer due to the reduced amount of disturbed area. Though not identified as significant and unavoidable impacts, this alternative would substantially less the impacts associated with grading, habitat removal, and creation of impervious surfaces. However, it should be noted that this Alternative does not offer the same level of amenities (i.e., trails, parks, and pedestrian bridge) as the proposed Project. While increasing public access opportunities over the existing condition and compared to Alternatives A and B, Alternative F would not provide the same extent of public access amenities (i.e., pedestrian/bike overcrossing) as compared to the proposed Project, and would not provide overnight visitor accommodations, which is an important Coastal Act policy consideration.

Significant and Unavoidable Impacts

Alternative F would substantially lessen construction air emissions impacts compared to the proposed Project because less development is proposed; the area of disturbance would be smaller; and grading would be reduced by 25 to 35 percent. However, Alternative F would not eliminate any significant and unavoidable impacts identified with the proposed Project. The following significant and unavoidable impacts would occur with Alternative F:

- There would be land use incompatibility with respect to night illumination associated with the Community Park and long-term noise impacts on those Newport Crest residences immediately contiguous to the Project site. In addition, there would be a potential long-range noise impacts for residents on 17th Street west of Monrovia Avenue. For noise, though mitigation is proposed, noise impacts would remain significant if the residents of Newport Crest elect not to implement the mitigation measures to reduce the increased interior noise levels and if the City of Costa Mesa does not implement the recommended measure of resurfacing the street with rubberized asphalt (Threshold 4.1-1).
- Alternative F would include a “dark sky” lighting regulations in the NBR-PC that would apply to businesses (e.g., neighborhood commercial uses) and Homeowners Association-owned and operated land uses within 100 feet of the Open Space Preserve. However, Alternative F would introduce nighttime lighting into a currently unlit area. The Community Park is anticipated to have night lighting of active sports fields, which could result in light spillover onto adjacent properties. The night lighting impacts are considered significant and unavoidable. The City of Newport Beach General Plan Final EIR found that the introduction of new sources of lighting associated with development of the site would be considered significant and unavoidable. In certifying the General Plan Final EIR and approving the General Plan project, the City Council approved a Statement of Overriding Considerations, which notes that there are specific economic, social, and other public benefits that outweigh the significant and unavoidable impacts associated with the General Plan project (Threshold 4.2-3).
- Alternative F would be projected to result in a decrease in ADT and peak hour traffic volumes when compared to the proposed Project. This decrease in peak hour volumes

would not cause any of the intersections operating at an acceptable level of service with the Project to operate at an unacceptable level of service. Both Alternative F and the proposed Project would be expected to result in deficiencies at the intersection of Newport Boulevard at West Coast Highway in the City of Newport Beach which can be mitigated to a level considered less than significant. Alternative F and the proposed Project would significantly impact seven intersections in Costa Mesa: Newport Boulevard at 19th Street, Newport Boulevard at Harbor Boulevard, Newport Boulevard at 18th Street/Rochester, Newport Boulevard at 17th Street, Monrovia at 19th Street, Pomona Avenue at 17th Street, and Superior Avenue at 17th Street. Implementation of MM 4.9-2 would mitigate the impact to a level considered less than significant. However, the City of Newport Beach cannot impose mitigation on another jurisdiction. Therefore, if the Applicant is unable to reach an agreement with the City of Costa Mesa that would ensure that Alternative F impacts occurring in Costa Mesa would be mitigated concurrent with or preceding the impact, for purposes of this EIR, the impacts to be mitigated by the improvements would remain significant and unavoidable (Threshold 4.9-2).

- Without mitigation, regional (mass) emissions of NO_x are forecasted to exceed applicable thresholds in some construction years. Though MM 4.10-1 would reduce the emissions to less than significant levels, the availability of sufficient Tier 4 diesel engine construction equipment cannot be assured. Therefore, for purposes of this EIR, the impacts are found to be significant and unavoidable (Threshold 4.10-2).
- Long-term operational emissions of criteria pollutants would not exceed the SCAQMD mass emissions thresholds from initial occupancy through 2020. However, as development continues beyond 2020, emissions of VOCs and CO would exceed the significance thresholds, principally due to vehicle operations (Threshold 4.10-2).
- Alternative F would have a cumulatively considerable contribution to regional pollutant concentrations of O₃ (Threshold 4.10-3).
- Alternative F would emit quantities of GHGs that would exceed the City's 6,000 MTCO₂e/yr significance threshold. Similar to the Project, Alternative F would make a cumulatively considerable contribution to the global GHG inventory affecting global climate change (Threshold 4.11-1).
- The increased traffic volumes on 17th Street west of Monrovia Avenue would expose sensitive receptors to noise levels in excess of the City of Newport Beach's standards for changes to the ambient noise levels. At buildout, noise levels would also exceed significance thresholds in the City of Costa Mesa. MM 4.12-5 requires the Applicant to provide funds to the City of Costa Mesa to resurface the street with rubberized asphalt; however, the City of Newport Beach has no ability to ensuring that the mitigation would be implemented. Therefore, the forecasted impact to residents of 17th Street west of Monrovia is considered significant and unavoidable (Threshold 4.12-2).
- For portions of the Newport Crest development, there would be a significant increase in the ambient noise level due to the projected traffic volumes in the buildout condition. MM 4.12-6 would reduce impacts to levels within the "Clearly Compatible" or "Normally Compatible" classifications but would remain above the 5 dBA significance criterion in the General Plan. MM 4.12-7 would provide interior noise attenuation but because the City of Newport Beach does not have the authority to mandate the implementation of mitigation on private property that is not on the Project site, the impact would be significant and unavoidable (Threshold 4.12-4).

- Use of construction equipment would result in a substantial temporary increase in ambient noise levels to nearby noise-sensitive receptors in the vicinity of the Project. Due to the low existing ambient noise levels, the proximity of the noise-sensitive receptors, and duration of construction activities, the temporary noise increases would be significant and unavoidable (Threshold 4.12-2).

Feasibility and Ability to Meet Project Objectives

This Alternative is potentially feasible. However, public benefits, coastal access (pedestrian and bicycle bridge), and visitor-serving amenities would be reduced.

This Alternative is able to meet most of the Project objectives. However, it does not meet the objective of providing overnight visitor accommodations (Objective 4). In addition, it only partially meets the following objectives:

- Development of 75,000 square feet of retail commercial uses oriented to serve the needs of local residences and visitors utilizing the resort inn and the coastal recreational opportunities provided as part of the Project (Objective 5).
- Provide enhanced public access through the Coastal Zone through a system of pedestrian walkways, multi-use trails, and on-street bikeways designed to encourage walking and biking as an alternative to the use of automobiles by providing connectivity among residential, commercial, park, open space, and resort uses within the Project site and to existing adjacent open space, hiking and biking trails, the beach, and the Pacific Ocean (Objective 8).

This Alternative provides the land uses identified in the General Plan, with the exception of the resort inn. This Alternative “feasibly attain[s] most of the basic objectives of the project” and may be considered to be a potentially feasible alternative.

7.6 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires the identification of an environmentally superior alternative. Section 15126.6(e)(2) of the State CEQA Guidelines identifies 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.

Based on the evaluation contained in this EIR, Alternative B, General Plan Open Space Designation, would be the environmentally superior alternative because it provides for restoration of the Project site and maintains the greatest amount of open space. This Alternative is consistent with the General Plan. While this Alternative would have greater impacts than the No Project Alternative in the near-term, the long-term benefits associated with site restoration would be environmentally superior to maintaining the site as an oilfield.

Although Alternative B is the environmentally superior alternative, there are significant challenges affecting its feasibility. Additionally, Alternative B does not meet a number of the project objectives. Therefore, an environmentally superior *development* alternative is also being identified.

When evaluating the environmental impacts and community benefits, Alternative F, Increased Open Space/Reduced Development Area has been identified as the environmentally superior development alternative. Alternative F would provide development that is generally consistent with the General Plan Residential Village designation and would be able to meet almost of the project objectives. This Alternative provides greater protection of the environment by reducing the area of non-open space uses by approximately 20 percent and the site grading by 25 to 35 percent. This would provide greater biotic resources protection and reduction in the amount of impervious soil with the associated drainage benefits. With less grading there is an incremental decrease in construction air emissions (short-term benefit).

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