

6.0 ALTERNATIVES TO THE PROPOSED PROJECT

6.1 CEQA REQUIREMENTS FOR ALTERNATIVES IDENTIFICATION AND ANALYSIS

Under CEQA, the identification and analysis of alternatives to a project is a fundamental part of the environmental review process. Public Resources Code (PRC) Section 21002.1(a) establishes the need to address alternatives in an EIR by stating that in addition to determining a project's significant environmental impacts and indicating potential means of mitigating or avoiding those impacts, "the purpose of an environmental impact report is ... to identify alternatives to the project."

Direction regarding the definition of project alternatives is provided in State CEQA Guidelines Section 15126.6(a):

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.

The State CEQA Guidelines emphasize that the selection of project alternatives be based primarily on the ability to reduce impacts relative to a proposed project, "...even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly."¹ The State CEQA Guidelines further direct that the range of alternatives be guided by a "rule of reason," such that only those alternatives necessary to permit a reasoned choice are addressed.²

Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site.

Beyond these factors, the State CEQA Guidelines require the analysis of a "no project" alternative and an evaluation of alternative location(s) for a project, if feasible. Based on the alternatives analysis, the City of Newport Beach (City) must identify an environmentally superior alternative. If the environmentally superior alternative is the no project alternative, then the EIR must identify an environmentally superior alternative among the other alternatives.³ In addition, State CEQA Guidelines Section 15126.6(c) requires that an EIR identify any alternatives that were considered for analysis but rejected as infeasible and discuss the reasons for their rejection.

The Program EIR evaluates potential environmental impacts that could result from the Housing Implementation Project, including future housing development on the housing sites.

¹ State CEQA Guidelines Section 15126.6(b).

² State CEQA Guidelines Section 15126.6(f).

³ State CEQA Guidelines Section 15126.6(e)(2).

6.2 CRITERIA FOR SELECTING ALTERNATIVES

The range of feasible alternatives must be selected and discussed in a manner to foster meaningful public participation and informed decision making. Several criteria were used to select alternatives to the Proposed Project. These criteria are described below.

6.2.1 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.

The State CEQA Guidelines do not require an EIR to consider every plausible alternative to a project, but rather must examine in detail only the ones which the lead agency determines could feasibly attain most of the basic project objectives.

The adopted and statutorily compliant (certified) 2021–2029 Housing Element provides the City with a coordinated and comprehensive strategy for promoting the production of safe, decent, and affordable housing for all within the City. The 2021–2029 Housing Element was prepared to ensure the City establishes policies, procedures, and incentives in its land use planning and development activities that result in maintenance and expansion of the housing supply to adequately accommodate households currently living and expected to live in the City.

The objective of the proposed Project is to ensure compliance with State housing law and implementation of the 2021–2029 Housing Element, including an update to the City’s Land Use Element and rezoning of housing opportunity sites.

6.2.2 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 (PRC §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 Program 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 4.18 of this Program EIR. With implementation of the Mitigation Program identified for each topical issue, many of the potentially significant impacts resulting from future development on the housing sites would be reduced to a level considered less than significant. The following topical issues are expected to result in significant and avoidable impacts even after mitigation:

- Aesthetics: light and glare (Banning Ranch)
- Air Quality
- Cultural Resources: historic resources
- Greenhouse Gas Emissions
- Noise
- Utilities and Service Systems: water supply

6.2.3 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).

An EIR also does not need to consider alternatives whose effects cannot be reasonably ascertained and whose implementation is remote and speculative. If the lead agency determines no alternative projects or locations are feasible, it must disclose the reasons for this conclusion in the EIR (State CEQA Guidelines §15126.6).

Unlike a typical development project or even an update to a General Plan initiated by a local agency, the proposed Project is being undertaken to implement the City's 2021-2029 Housing Element, a state-mandated 6th Cycle Regional Housing Needs Assessment (RNHA) that identified a specific number of new residential units that the City is required to plan for and accommodate. Each alternative was evaluated for its feasibility, its ability to attain the Project's objectives, and its ability to reduce and/or eliminate significant impacts associated with the Project.

6.3 DEVELOPMENT ALTERNATIVES CONSIDERED BUT NOT CARRIED FORWARD

Compliance with the 6th Cycle RHNA mandate significantly narrows options available for alternatives that both meet the basic Project objectives that are driven by the RHNA issued by the Southern California Association of Governments (SCAG) as well as those capable of avoiding or substantially reducing the potentially significant impacts identified for the proposed Project. The following alternative has not been carried forward in this Program EIR because it would not meet the basic objectives of the proposed Project; was not considered feasible; and/or would not result in any substantial avoidance or minimization of impacts that are not already accommodated in the other alternatives being evaluated.

6.3.1 Alternative Housing Sites

State CEQA Guidelines Section 15126.6(f)(2)(A) notes the following concerning alternative locations:

The key question and first step in (alternative location) 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.

Under the Alternative Housing Sites scenario, the City would consider a different or broader range of sites to accommodate housing to be planned for to meet the RHNA while still meeting the basic objectives of the Project to ensure compliance with State housing law and implementation of the 2021–2029 Housing Element and avoiding or substantially reducing potentially significant environmental impacts.

Unlike a typical CEQA alternative site analysis for a development project (i.e., a different property), the proposed Project is a citywide planning effort that involves consideration and review of hundreds of potential housing sites throughout the City. The guidance provided by CEQA relates largely to how impacts associated with individual sites could be reduced or avoided by relocating the planned project.

As required by State Housing Law, the City adopted and HCD certified the 2021-2029 Housing Element, which identifies specific parcels/sites that may be available and suitable (e.g., avoids major constraints) for residential development in order to demonstrate that Newport Beach has adequate capacity to accommodate residential development as necessary to achieve the City's 6th Cycle RHNA. Alternate housing sites were considered but rejected during the preparation of the 2021-2029 Housing Element because they were determined to be Infeasible during the City's Candidate Sites Analysis process due to regulations, site constraints, property owner interest in developing housing, community input, and existing uses. Development on a different or amended set of sites throughout the City would be unlikely to avoid or substantially lessen potentially significant impacts identified for the proposed Project as the proposed levels of residential development and population growth would remain similar and therefore result in similar environmental impacts as identified in this Program EIR for the proposed Project. Therefore, based on the City's previous detailed screening of sites throughout the City and limited or no reduction in environmental impacts, the Alternative Housing Sites Alternative has been eliminated from further consideration in the Program EIR.

6.4 PROJECT ALTERNATIVES CONSIDERED

State CEQA Guidelines Section 15126.6 (d) of the CEQA Guidelines requires an EIR to provide sufficient information about each alternative to allow for meaningful evaluation, analysis, and comparison with the Project. Pursuant to State CEQA Guidelines Section 15126.6, an analysis of alternatives is presented in this Program EIR to provide decision-makers with alternatives to be considered. The State CEQA Guidelines specify that an EIR shall describe a reasonable range of alternatives that would avoid or substantially lessen the Project's significant effects but need not consider every conceivable alternative.

The following alternatives are analyzed in this Program EIR:

- Alternative A: No Project
- Alternative B: RHNA with Reduced Buffer
- Alternative C: RHNA Only

The three analyzed alternatives present a reasonable range of alternatives to the proposed Project. The analysis in this section focuses on significant and unavoidable impacts attributable to each alternative and the ability of each alternative to meet basic Project objectives. The evaluation of each alternative uses the same thresholds of significance identified in Sections 4.1 through 4.18.

6.4.1 Alternative A: No Project Alternative

Description of the Alternative

Alternative A is the “No Project” alternative required by the State CEQA Guidelines Section 15126.6(e) which allows the decision-makers to compare the potential impacts of the proposed Project with the potential impacts of not approving the proposed Project. Section 15126.6(e)(2) of the State CEQA Guidelines 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.

State CEQA Guidelines Section 15126.6(e)(3)(A) states:

When the project is the revision of an existing land use or regulatory plan, policy or ongoing operation, the “no project” alternative will be the continuation of the existing plan, policy or operation into the future. Typically this is a situation where other projects initiated under the existing plan will continue while the new plan is developed. Therefore, the projected impacts of the proposed plan or alternative plans would be compared to the impacts that would occur under the existing plan.

There are 247 housing sites, of which only 21 sites are vacant. Alternative A assumes that future development of the sites could occur consistent with the existing underlying zoning of the sites. No overlays would be adopted and no General Plan Land Use Element policy amendments would occur to facilitate housing development and implement the 2021-2029 Housing Element. While the proposed Project does not consider any loss of existing on the ground development which may be displaced to accommodate 9,914 housing units, Alternative A acknowledges that fewer sites would be redeveloped.

It is speculative to know how many of the currently developed sites would be redeveloped. Future reuse would likely occur on these sites over time depending upon numerous factors such as market conditions, and economic and planning considerations, and at the individual property owners’ discretion.

Under Alternative A, no development would occur on 14 of the 21 vacant housing sites. The two housing sites in the Coyote Canyon Focus Area (housing sites 131 and 336) have a General Plan land use designation and is zoned Parks and Recreation (PR). Therefore, the Coyote Canyon Focus Area assumes development of the property with active public or private recreational use. Permitted uses could include active and passive parks, golf courses, tennis clubs and courts, private recreation, and similar facilities.

Banning Ranch is designated in the General Plan Land Use Element as OS(RV). The proposed Project does not include a zoning overlay for the Banning Ranch Focus Area. Consistent with the 2021-2029 Housing Element, Alternative A assumes the potential to accommodate 1,475 housing units (at an assumed unit yield of 50 du/ac) on 44 acres. The Banning Ranch Focus Area is included in the 2021–2029 Housing Element’s sites inventory but is not assumed in order to accommodate the City’s 6th Cycle RHNA growth allocation. Banning Ranch is considered as an additional dwelling unit opportunity beyond that needed to accommodate the RHNA.

The proposed Project's housing sites inventory is intended to accommodate future housing development on identified properties, consistent with the 2021-2029 Housing Element. The No Project Alternative is the circumstance under which the actions required to implement the Housing Element would not occur. Although the City would continue to have an approved and certified Housing Element, the City would not provide adequate opportunities to implement the 2021-2029 Housing Element because the City would not approve and/or amend (1) General Plan goals and policies; (2) Housing Opportunity Overlay zoning districts for the focus areas, including housing sites in the Coastal Zone; and (3) Local Coastal Program policies. Following certification by HCD, the City is required to ensure the continued and effective implementation of the Housing Element programs including, but not limited to, the provision of sufficient adequately zoned land to accommodate its share of the regional growth and its required share of lower income dwelling units consistent with the General Plan and RHNA obligations.

HCD notes that various consequences may apply if a city or county does not have a Housing Element in compliance with State Housing Element Law. First, noncompliance would result in ineligibility or delay in receiving State funds that require a compliant Housing Element as a prerequisite including, but not limited to, the Permanent Local Housing Allocation Program, the Local Housing Trust Fund Program, the Infill Infrastructure Grant Program, SB 1 Caltrans Sustainable Communities Grants; and the Affordable Housing and Sustainable Communities Program.

Second, jurisdictions that do not meet their Housing Element requirements may face additional financial and legal ramifications. HCD may notify the California Office of the Attorney General, which may bring suit for violations of State Housing Element Law. Further, State law provides for court-imposed penalties for persistent noncompliance, including financial penalties. For example, Government Code Section 65585(l)(1) establishes a minimum fine of \$10,000 per month, up to \$100,000 per month. If a jurisdiction remains noncompliant, a court can multiply those penalties by a factor of six. Other potential ramifications could include the loss of local land use authority to a court-appointed agent.

Future housing development facilitated by the 2021-2029 Housing Element would only occur where the proposed multi-unit use is currently consistent with applicable land use regulations; otherwise, future projects may require both amendments to General Plan land use designations and rezones.

In addition to the legal remedies available in the courts, under the Housing Accountability Act (Government Code §65589.5(d)), jurisdictions without a substantially compliant Housing Element cannot rely on inconsistency with zoning and general plan standards as a basis for denial of a housing project for Very-Low-, Low-, or Moderate-Income households.⁴

Impact Comparison to the Proposed Project

Aesthetics

Alternative A assumes future development on 7 of the 21 vacant sites and reuse of currently developed properties would occur on the housing sites consistent with the existing land use and zoning, and existing Municipal Code requirements. Like the proposed Project, Alternative A does not assume construction on the housing sites. Future development on identified housing sites would be subject to project-specific review, including design review, and would be required to comply with the goals and policies in the City's General Plan and Municipal Code.

⁴ For purposes of the Housing Accountability Act, housing for very low-, low-, or moderate-income households is defined as having at least 20 percent of units set aside for low-income residents or 100 percent of units set aside for middle-income residents. (Gov. Code §65589.5(h)(3)).

Under the Alternative A scenario, no General Plan Land Use Element or Local Coastal Plan policy amendments, including updates to policies that would minimize potential impacts to scenic vistas from future development, would be adopted. These policies include Policy LU 1.1 which would require future housing developments to be designed in a manner that maintains and enhances neighborhood character and public views.

Because Alternative A assumes development consistent with designated land uses, the General Plan EIR findings for aesthetics is applicable. The General Plan EIR notes that, with the exception of lighting associated with the development of Banning Ranch, impacts associated with aesthetics would be less than significant with compliance with General Plan policies and Municipal Code regulations. The “substantial increase of lighting” was identified as a significant impact to the Banning Ranch area, if the area is ultimately developed, with no feasible mitigation available to reduce the impact. With the exception of significant, unavoidable lighting impacts associated with Banning Ranch, potential impacts associated with the topic of Aesthetics would be less than significant for both the proposed Project and Alternative A.

Air Quality

The proposed Project would conflict with the growth assumptions in the Air Quality Management Plan (AQMP) and would exceed the South Coast Air Quality Management District (SCAQMD) daily emissions thresholds during long-term operations. There are no feasible mitigation measures to reduce this impact to a less than significant level. Therefore, on a programmatic level, the Project would result in a significant and unavoidable impact concerning air quality plan consistency, long-term air quality emissions, and exceedance of Localized Significance Thresholds (LSTs) associated with construction and operational emissions.

Under Alternative A, future development would occur consistent with the existing General Plan and zoning designations applicable to the housing sites, and therefore, would be consistent with growth assumptions in the SCAQMD AQMP. Alternative A would not conflict with or obstruct implementation of the AQMP. Similar to the Project, future development would generate air quality emissions, and SCAQMD rules and any applicable measures would be applied on a project-by-project basis in order to minimize those potential adverse air quality effects. Because Alternative A assumes that the vacant sites would be developed and the developed sites would be developed with non-residential uses (unless current zoned for residential uses), air quality impacts under Alternative A are expected to be similar when compared to the proposed Project. With respect to the topic of Air Quality, impacts for the proposed Project and Alternative A would be significant and unavoidable.

Biological Resources

Except for the vacant housing sites, all of the other housing sites are developed/occupied by structures and do not contain special status species, riparian habitats, other sensitive communities, or wetlands. The housing sites are also largely bordered by urban development. Following compliance with General Plan policies and **MM BIO-1**, the Project’s potential impacts to special-status species habitats, riparian habitats or other sensitive communities, and wetlands would be reduced to less than significant levels. Under Alternative A, these sites would have the potential to be developed consistent with their General Plan and zoning designation, subject to compliance with General Plan, Municipal Code, and relevant City policies. Therefore, Alternative A would result in the same or similar impacts to biological resources as the proposed Project.

Cultural Resources

The Project was determined to have the potential to impact historic and archaeological resources and to disturb human remains from ground disturbing activities. Following compliance with City Council and General Plan policies, **SC CUL-1** and **SC CUL-2**, and **MM CUL-1** and **MM CUL-2**, the proposed Project's potential impacts to archeological resources would be less than significant. However, potential impacts to historic resources would remain significant and unavoidable. Under Alternative A, historic and archaeological resources could be impacted, including by ground disturbing activities and redevelopment of non-vacant housing sites. Vacant sites would have the potential to be developed under the existing General Plan and zoning designations and could still affect cultural resources. Future projects under Alternative A would similarly implement **SC CUL-1** and **SC CUL-2**, and **MM CUL-1** and **MM CUL-2** to minimize potential impacts to cultural resources. Because Alternative A assumes that housing sites could be developed or redeveloped, there is the potential to discover and impact historic resources and previously undisturbed cultural resources and archaeological resources. Consistent with the findings for the proposed Project, Alternative A could result in significant unavoidable impacts to historic resources. Impacts to cultural and archaeological resources would be mitigated to a less than significant level.

Energy

Alternative A assumes less housing development than the proposed Project but would allow development to occur in the City consistent with the existing land use designations for the housing sites, which require use of energy resources for construction and operation. Alternative A may have a reduced total energy demand than the proposed Project. For example, the Coyote Canyon Focus Area housing sites could be developed with active and passive recreational uses that would have less energy demand than housing. Future development under both the proposed Project and Alternative A would be more-energy efficient development because Title 24 standards continue to be modified to include more energy efficiency requirements. Impacts would be less than significant under both the proposed Project and Alternative A because development under either scenario would not conflict with plans for energy efficiency or result in the wasteful use of energy.

Geology and Soils

The City is within a seismically active area that could be subject to strong seismic ground shaking with the highest risks originating from the Newport-Inglewood fault zone, the Whittier fault zone, the San Joaquin Hills fault zone, and the Elysian Park fault zone. Additionally, of the housing sites that have residential land use designations, 3 housing sites are located within liquefaction susceptibility zones and 3 housing sites within landslide susceptibility zones. The site-specific underlying geology is not known for the housing sites at this level of programmatic analysis; however, older shallow marine sediments that have the potential to produce paleontological resources have been identified within the City. Therefore, there is a likelihood that earthwork activities associated with future housing development facilitated by the proposed Project would encounter paleontological resources.

Alternative A would result in comparable impacts involving geology, soils, and paleontological resources as the Project, given the similar footprints of existing housing sites and potential for future development under the existing General Plan and zoning. Because both the proposed Project and Alternative A would result in an increase in potential geology and soil impacts, development under either alternative scenario would be subject to compliance with General Plan, Municipal Code, and Local Coastal Program policies, and **SC GEO-1**. Therefore, potential impacts associated with Alternative A would be the same or similar to the proposed Project; impacts would be less than significant.

Greenhouse Gas Emissions

The proposed Project would be consistent with applicable plans, policies, and regulations. However, due to the magnitude of the Project's GHG emissions, impacts would be significant and unavoidable at the program level. Alternative A assumes development or reuse of the housing sites consistent with the General Plan and zoning, which would generate GHG emissions. Future development under both Alternative A and the proposed Project would result in increased GHG emissions; however, as the ultimate land uses and nature of development under Alternative A cannot be known at this time, GHG emissions associated with vehicle miles travelled (VMT) could be greater due to greater distance between jobs and housing in the City. Additional GHG emissions would result from construction activities, stationary area sources (i.e., natural gas consumption for space and water heating devices, landscape maintenance equipment operations, and use of consumer products), energy consumption, water supply, and solid waste generation. As with the proposed Project, future projects under Alternative A would be subject to applicable General Plan policies and would be required to implement **MM GHG-1**. Therefore, both the proposed Project and Alternative A could result in significant unavoidable impacts.

Hazards and Hazardous Materials

Alternative A assumes less housing development than the proposed Project but would allow development to occur on the housing sites, consistent with the sites' existing General Plan designation and zoning. Similar to the proposed Project, compliance with established General Plan and Municipal Code policies would minimize impacts from the routine transport, use, and disposal of hazardous materials and from reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Alternative A would have similar impacts concerning demolition, transport, or disposal of hazardous materials associated with potential demolition, grading, and construction activities necessary (on a site-by-site basis) consistent with the existing General Plan and zoning.

With respect to proximity to John Wayne Airport, Alternative A assumes that less housing would be constructed in the future in the Airport Area Focus Area because this alternative would not adopt Housing Overlay Zones. No housing would occur in the Airport Environs Land Use Plan (AELUP) for John Wayne Airport Safety Zone 3, 4, or 6. While impacts associated with airport safety hazards would be less than significant for the proposed Project, Alternative A would limit the amount of future housing proximate to the airport.

Hydrology and Water Quality

Alternative A assumes development to occur on the housing sites, consistent with the sites' existing General Plan designation and zoning. Similar to the proposed Project, future development under Alternative A would be required to demonstrate compliance with water quality standards through compliance with all applicable local, State, federal regulatory requirements. Further, development under Alternative A and the Proposed Project would not deplete groundwater supplies or interfere with groundwater recharge. Therefore, hydrology and water quality effects would be similar when compared to the Proposed Project. Under both development scenarios, impacts would be less than significant.

Land Use and Planning

Under Alternative A, development on housing sites would occur in a manner that is consistent with the existing General Plan and zoning. Similar to the proposed Project, a majority of development under Alternative A would either redevelop existing sites or introduce development (infill) urbanized portions of the City. Alternative A would not divide the community with projects that typically create physical

divisions or separation within cities such as freeways or other large infrastructure projects that divide one portion of a City from another. Additionally, future development under Alternative A would be required to demonstrate consistency with applicable land use plans and policies, including the General Plan, Municipal Code, and SCAG's Connect SoCal. However, Alternative A would preclude the City from meeting its 6th Cycle RHNA allocation of 4,845 units. Therefore, the City would not be in compliance with State Housing laws. Following certification by HCD, the City is required to ensure the continued and effective implementation of the Housing Element programs including, but not limited to, the provision of sufficient adequately zoned land to accommodate its share of the regional growth and its required share of lower income dwelling units consistent with the General Plan and RHNA obligations.

Noise

Under both the proposed Project and Alternative A scenarios, construction activities would occur on the housing sites. Similarly, under Alternative A, development, consistent with existing General Plan land use and zoning, could occur throughout the City. Under both, construction activities associated with any individual development could also occur near noise-sensitive receptors and noise disturbances and excessive groundborne vibration/noise levels, could occur for prolonged periods of time. However, following compliance with Municipal Code Section 10.28.040 (Construction Activity – Noise Regulations) and Municipal Code Section 10.26.035(D), neither the Project nor Alternative A would result in significant impacts concerning noise.

Operational traffic noise impacts associated with the Project would be less than significant with the exception of the roadway segment of Campus Drive from MacArthur Boulevard to Von Karman Avenue where traffic noise impacts would be significant and unavoidable. Under Alternative A, future development with the potential to increase traffic noise in the City could occur. Development occurring in the City would take place consistent with the existing General Plan and zoning regulations and the anticipated growth and development of the City identified in the existing General Plan and would not be of the scale to result in significant and unavoidable operational traffic noise impacts at Campus Drive from MacArthur Boulevard to Von Karman Avenue.

Additionally, Alternative A would introduce less residential uses proximate to John Wayne Airport, specifically in the 60 dBA to 65 dBA CNEL noise contour where residential uses are “conditionally consistent” and the 65 dBA to 70 dBA CNEL noise contour where residential uses are “normally inconsistent.” While the proposed Project would result in less than significant impacts concerning housing development proximate to John Wayne Airport following compliance with established City policies, Alternative A would avoid potential impacts and conflicts with AELUP requirements. Therefore, potential impacts under Alternative A would be less than the proposed Project for construction and operations.

Population and Housing

Based on population projections from SCAG, population is anticipated to increase in the City with or without the proposed Project. The proposed Project would facilitate the development of additional housing throughout the City resulting in population growth in the City beyond existing conditions and growth planned under the General Plan. However, State law requires that the City accommodate its RHNA “fair share” of the region's housing needs, which cannot be achieved under Alternative A. Under Alternative A, housing sites would be developed consistent with the existing General Plan and zoning, which includes largely non-residential land uses and future development would be consistent with land use assumptions considered during the development of SCAG's Connect SoCal and other planning

documents. However, without the Project's proposed rezoning/land use amendments the City would not meet the RHNA mandated State law and the City would not provide its fair share of housing units.

Public Services

Implementation of the proposed Project would introduce additional housing and population to the City. A majority of the housing sites are currently developed and/or located in developed areas of the City, and served by existing public services including fire, police, schools, and libraries. Therefore, future housing development facilitated by the Project is not anticipated to require construction of new or physically alter fire, police, schools, or and library facilities, the construction of which could cause significant environmental impacts. Because Alternative A would involve development consistent with the existing General Plan and zoning, the potential development and redevelopment would be consistent with assumptions under the General Plan. The General Plan EIR determined that impacts would be less than significant base on compliance with General Plan policies and regulations. Non-residential development would not directly generate additional students. Alternative A would incrementally reduce the demand of public services when compared to the proposed Project. Under both development scenarios, impacts would be less than significant.

Recreation

When compared to the proposed Project, Alternative A would result in less demand for or impacts on parks and recreational facilities. Of the housing 247 sites, 226 of the sites are developed of which 12 sites are development with existing housing. Although there are additional sites that have existing General Plan land use and zoning that permit residential uses (see **Table 3-12 in Section 3.0: Project Description**), the majority of these sites are currently developed and it is unknown how many sites would be redeveloped with housing. Similar to the proposed Project, residential development projects under Alternative A would be required to demonstrate compliance with the City parkland requirements including the City's Park Dedication Fee Ordinance, General Plan Recreation Element Policies 1.2 and 2.1 and Land Use Element Policies LU 6.15.3 and 6.15.6, as applicable. Like the proposed Project, Alternative A would increase the use of existing neighborhood, community and regional parks or other recreational facilities but would not result in the substantial physical deterioration of park and recreational uses. The construction of new or expansion of existing recreational facilities would be subject to subsequent environmental review.

Transportation

As addressed in **Section 4.15: Transportation**, the procedure for evaluating Vehicle Miles Traveled (VMT) for land plans involves comparing the existing plan area VMT to Service Population (VMT/SP) with the expected horizon year VMT/SP. The target is to achieve a lower VMT/SP in the horizon year with the proposed land plan than occurs for the existing condition.

The proposed Project would decrease the amount of travel per individual that is forecast to occur in comparison to the existing conditions and in comparison to General Plan Buildout VMT. This is because the proposed Project would develop more housing proximate to where employment is located. In areas with a mix of residential and employment uses, VMT/SP is generally lower than in areas that have more uniform land uses. For example, a reduction in VMT can be attributed to the introduction of housing within areas that are currently characterized by predominantly office uses, resulting in a more balanced land uses. In other areas, VMT/SP increases due to a change from no residents (existing non-residential land uses) to a residential population greater than employment in the traffic analysis zone (TAZ). Because of

differences in the mix of land uses within different TAZs, the VMT/SP could be lower or higher when compared to the assumptions for the Project as a whole.

Alternative A assumes development or redevelopment of the housing sites consistent with the existing land use designations for the sites. Therefore, most of the sites would be developed or redeveloped with non-residential uses. The citywide Existing Conditions VMT/SP is 30.9 and buildout of the General Plan would have a VMT/SP of 32.2. Therefore, when compared to Existing Conditions VMT/SP of 30.9 and the Project VMT/SP of 30.2, VMP/SP would worsen based on General Plan buildout without the Project. This would occur because less housing would be located proximate to employment uses resulting in increased travel per individual. When compared to the proposed Project, Alternative A would have greater traffic impacts.

Tribal Cultural Resources

The proposed Project's potential impacts to tribal cultural resource would be reduced to a less than significant level following compliance with **MM TCR-1** and **MM TCR-2**. Alternative A could have similar impacts to the Project regarding tribal cultural resources because development could occur on the 247 housing sites. Construction would likely include grading activities that could unearth tribal cultural resources. The level of potential impacts on tribal cultural resources from construction and grading activities would be similar under both the proposed Project and Alternative A and would require implementation of applicable mitigation. As with the proposed Project, potential impacts associated with Alternative A can be mitigated to a less than significant level.

Utilities and Service Systems

Implementation of the proposed Project is anticipated to incrementally increase population by 21,811 persons. This increase in population growth would require additional potable water resources, would generate additionally wastewater, would generate solid waste, and would require additional electric, natural gas and telecommunication resources. However, the Project would result in a less than significant impact related to the relocation or construction of new or expanded wastewater treatment or storm water drainage, electric power, natural gas, or telecommunication facilities following compliance with the General Plan policies and **SC UTIL-1** through **SC UTIL-3**. However, despite compliance with federal, State, and local requirements, the water demands from future development facilitated by the Project would result in a significant and unavoidable impact concerning water supply because the Urban Water Management Plans (UWMP) for the City of Newport Beach, Irvine Ranch Water District (IRWD), and Mesa Water District do not include the 6th Cycle RHNA allocation for the jurisdictions within their respective service areas. Although it is expected that there would be adequate water supply for existing and future uses, documentation is not available to demonstrate that adequate water supply is available.

Under Alternative A, development would occur consistent with the existing General Plan land use and zoning, which were accounted for in the 2020 UWMP. Population growth under Alternative A would be less than the proposed Project. Alternative A is anticipated to incrementally reduce the demand on water, wastewater, solid waste, electric, natural gas and telecommunication resources when compared to the proposed Project and would be consistent with the UWMP assumptions for Newport Beach. Alternative A would eliminate the significant unavoidable impact associated with water supply. With respect to the remaining utilities, impacts would be less than significant for both the Project and Alternative A.

Wildfire

The proposed Project assumes future housing development on housing sites 131 and 336 in the Coyote Canyon Focus Area, which are located within Very High Fire Hazard Severity Zones (VHFHSZ). The remaining sites are outside Fire Hazard Severity Zones. Compliance with federal, State, and local laws and regulations, and implementation of **MM W-1** would ensure that impacts to the public and environment related to risk of hazards due to urban fires would be less than significant. Although the majority of the housing sites are developed, Alternative A would limit population growth and higher density in the City compared to the proposed Project and in turn further minimize the potential for wildfire or high wind exposure to new residents or structures. Further, Alternative A would allow for recreational development on housing sites 131 and 336, consistent with the existing General Plan and zoning, and would not introduce habitable structures or expose residents to wildfire hazards. Because Alternative A does not assume new residential uses within the Coyote Canyon Focus area, fewer residential uses would be within a VHFHZ. Although wildfire impacts associated with both the proposed Project and Alternative A would be mitigated to a less than significant level, Alternative A would have a reduced impact when compared to the Project.

Feasibility and Ability to Meet Project Objectives

The proposed Project objective is to ensure compliance with State housing law and implementation of the 2021–2029 Housing Element, including an update to the City’s Land Use Element and rezoning of housing opportunity sites. Alternative A would not facilitate development housing to ensure compliance with State housing law and implementation of the 2021–2029 Housing Element. Alternative A would not attain any of the Project objectives, including those that are required to comply with State law, except the Alternative A would preserve the community’s existing housing stock and no existing housing would be impacted.

Conclusion

Under the No Project Alternative, the City would not meet its 6th Cycle RHNA allocation and would result in risk of penalties and loss of eligibility for funding opportunities due to the City’s noncompliance with various State housing-related laws. Therefore, this alternative would directly conflict with California Government Code Section 65583, which stipulates that a jurisdiction must implement the Housing Element and facilitate development of housing to provide for the existing and projected needs of all economic segments of the community.

6.4.2 Alternative B: RHNA with Reduced Buffer

Description of the Alternative

The RHNA identified the projected number of dwelling units needed to accommodate estimated future growth during the 6th Cycle planning period (2021-2029) at specified levels of affordability. The City’s 6th Cycle RHNA allocation is 4,845 housing units, including 1,456 Very-Low-Income units and 930 Low-Income units. The City’s 2021–2029 Housing Element demonstrates compliance with its RHNA obligations including the identification of housing sites.

In addition to the 6th Cycle RHNA allocation, this Program EIR analysis accounts for additional housing units as a buffer to address future “no net loss” to preclude the need to identify replacement sites during 6th Cycle implementation. State Housing laws require cities and counties to identify RHNA obligations by income category. It is important to note that future housing applicants are not required to meet

affordability goals. The City is obligated to ensure there is no net loss when projects are developed such that there are adequate opportunities for the City to meet its RHNA obligations, particularly in order to demonstrate that Low-Income and Very-Low-Income units are being constructed. Therefore, the proposed Project assumes a total development capacity of 9,914 units including future development capacity of up to 9,649 units on 247 housing sites, 25 units of pipeline projects, and 240 units of anticipated accessory dwelling units (ADUs).

Alternative B assumes a reduced buffer, representing a range of units between the City's RHNA allocation (4,845 units) and the proposed Project (9,914 units), to address future "no net loss". Because future housing projects on the identified housing sites would occur incrementally over time, largely based on economic conditions, market demand, and other planning considerations, it is speculative to know how many of the housing sites will be developed, the number of housing units on a housing site, or the affordability characteristics of the projects. Should the City have an insufficient number of remaining sites to meet its RHNA obligations in the income categories resulting in a net loss, the City has 120 days to provide rezoning that accommodates the net loss.

This alternative would still require amendments/updates to General Plan Land Use policies, the Municipal Code, and Local Coastal Program. It is not possible to know which combination of housing sites would be developed at what densities; however, the overall development capacity would result in an incremental decrease in the number of housing units and/or housing throughout the City.

This alternative was selected for analysis because it would result in a lower intensity of development that could lessen some of the Project's environmental effects. It would not, however, substantially lessen or eliminate all of the Project's significant and unavoidable effects for the reasons discussed further below. Nevertheless, the alternative could potentially meet the City's RHNA obligations and Project objective of implementing the City's 2021-2029 Housing Element, while lessening some of the project's effects.

Impact Comparison to the Proposed Project

Aesthetics

Alternative B would result in a lower overall development capacity and could result in fewer visual changes than the Project because fewer housing sites may be developed or redeveloped. However, like the Project, Alternative B assumes that residences could be constructed in the future on the 247 housing sites throughout the City. If sites are developed at a lower density, building heights could be similar or the same as for the proposed Project consistent with the Housing Opportunity Zone building height standards. Housing development would be subject to the City's development review process including review with applicable General Plan policies, Municipal Code standards, proposed *Multi-Unit Objective Design Standards*, and subject to the City's development review process and other permit approval to minimize potential for significant impacts concerning scenic resources and lighting/glare, with the exception of Banning Ranch. Like the proposed Project and Alternative A, the 2021-2029 Housing Element identifies housing sites within the Banning Ranch Focus Area. The General Plan EIR found that development of Banning Ranch would have a "substantial increase of lighting" and no feasible mitigation was available to reduce the impact. With the exception of significant, unavoidable lighting impacts associated with Banning Ranch, potential impacts associated with the topic of Aesthetics would be less than significant for both the proposed Project and Alternative B.

Air Quality

Alternative B would result in a reduced overall development capacity and could result in fewer air quality impacts as compared to the proposed Project. Alternative B would still adopt Housing Overlay Zones to facilitate future development of housing on identified housing sites throughout the City. Similar to the Project, future housing development would result in air quality emissions, and SCAQMD Rules and any applicable measures would be applied on a project-by-project basis in order to minimize those potential negative air quality effects. However, due to the intensity of proposed development, Alternative B would similarly conflict with the growth assumptions in the AQMP and would exceed the SCAQMD daily emissions thresholds during long-term operations. Air quality emissions would be proportionally less than the proposed Project due to a reduced overall development capacity, but potential impacts to air quality would remain significant and unavoidable.

Biological Resources

Although overall development capacity would be reduced under Alternative B, housing development on each of the 247 housing sites would still be allowed. Following compliance with General Plan policies and **MM BIO-1**, both the Project and Alternative B's potential direct impacts to special-status species habitats, riparian habitats or other sensitive communities, and wetlands would be reduced to less than significant levels. Under Alternative B, although the total development capacity would be reduced, these sites would have the potential to be developed with housing and as such would result in a similar impact to biological resources as the proposed Project.

Cultural Resources

Although overall development capacity would be reduced under Alternative B, housing development on each of the 247 housing sites could occur. Similar to the proposed Project, Alternative B would have the potential to impact historic and archaeological resources and human remains from ground disturbing activities. Following compliance with City Council and General Plan policies, **SC CUL-1** and **SC CUL-2**, and **MM CUL-1** and **MM CUL-2**, both the Project and Alternative B would have a less than significant impact on archeological resources. However, potential impacts to historic resources for the proposed Project and Alternative B would remain significant and unavoidable.

Energy

Alternative B would demand less total energy than the Project given this alternative assumes a reduced overall development capacity. Similar to the Project, future development would result in more-energy efficient development because Title 24 standards continue to be modified to include more energy efficiency requirements. Overall, Alternative B would result in less intense housing development and proportionally reduced energy consumption. Neither the proposed Project nor Alternative B would result in the wasteful use of energy.

Geology and Soils

Although overall development capacity would be reduced under Alternative B, housing development on the 247 housing sites would still be allowed, including the 31 housing sites located within liquefaction susceptibility zones and 17 housing sites within landslide susceptibility zones. Alternative B would result in comparable impacts involving geology, soils, and paleontological resources as the Project, given the housing sites are the same. Both the proposed Project and Alternative B would be subject to compliance

with General Plan, Municipal Code, and Local Coastal Program policies, and **SC GEO-1** and would have less than significant impacts concerning geology, soils, and paleontological resources.

Greenhouse Gas Emissions

Alternative B would result in a reduced development capacity and could result in fewer GHG emission impacts as compared to the proposed Project. Similar to the Project, future housing development under Alternative B would result in increased GHG emissions and future developments would be evaluated on a project-by-project basis. Development under Alternative B or the proposed Project scenarios would be subject to applicable General Plan policies and would be required to implement **MM GHG-1**, as applicable to the specific development project. Greenhouse gas emissions would be proportionally less than the proposed Project due to a reduced overall development capacity, but potential impacts to GHG emissions would remain significant and unavoidable due to the scale of housing development and growth beyond assumptions of the General Plan and SCAG's Connect SoCal.

Hazards and Hazardous Materials

Although overall development capacity would be reduced under Alternative B, housing development on each of the 247 housing sites is assumed under this scenario. Similar to the proposed Project, compliance with established General Plan and Municipal Code policies would minimize impacts from the routine transport, use, and disposal of hazardous materials and from reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Alternative B would have similar impacts concerning demolition, transport, or disposal of hazardous materials associated with potential demolition, grading, and construction activities necessary (on a site-by-site basis) consistent with the existing General Plan and zoning.

With regards to operations, future development on housing sites under both the proposed Project and Alternative B would be required to comply with applicable building and fire safety regulations required for the design of new housing and emergency access and impacts would be less than significant. With respect to proximity to John Wayne Airport, Alternative B assumes that less housing could be constructed in the future in the Airport Area Focus Area because this alternative would have a reduced overall development capacity. However, similar to the proposed Project, residential development would be allowed in various Safety Zones. For those housing sites in Safety Zone 6, residential uses are allowed and would not impact the standards or operations of this zone. For those housing sites exclusively in Safety Zone 4, the AELUP for John Wayne Airport states that higher densities as infill in urban areas if alternative uses are impractical. For the four housing sites – 70, 360, 363, and 367 – that are partially within Safety Zone 3, housing development would be limited to low-density residential uses as identified in the R-1 zoning district. Therefore, impacts would be less than significant for both the proposed Project and Alternative B.

Hydrology and Water Quality

Although overall development capacity would be reduced under Alternative B, housing development on each of the 247 housing sites would still be allowed. Similar to the proposed Project, future housing development under Alternative B would be required to demonstrate compliance with water quality standards through compliance with all applicable local, State, federal regulatory requirements. As with the Proposed Project, this alternative would not deplete groundwater supplies or interfere with groundwater recharge. Impacts for both the proposed Project and Alternative B would be less than significant.

Land Use and Planning

Alternative B would facilitate housing development on the identified housing sites through the adoption of General Plan, zoning, and Local Coastal Program amendments, similar to the proposed Project. Development under Alternative B would redevelop existing sites or introduce housing on predominately infill housing sites in urbanized portions of the City and would not divide the community with projects that typically create physical divisions or separation within cities such as freeways or other large infrastructure projects that divide one portion of a city from another. Similar to the proposed Project, Alternative B would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigation an environmental effect and would be consistent with the requirements of State housing law. Neither the proposed Project nor Alternative B would result in significant land use impacts.

Noise

Although overall development capacity would be reduced under Alternative B, housing development within each of the 247 housing sites would still be allowed. Construction activities associated with any individual development could also occur near noise-sensitive receptors and noise disturbances and excessive groundborne vibration/noise levels, could occur for prolonged periods of time. However, individual developments would be subject to compliance with Municipal Code Section 10.28.040 (Construction Activity – Noise Regulations) and Municipal Code Section 10.26.035(D), and would not result in significant impacts concerning noise for either the Project or Alternative B.

Operational traffic noise impacts associated with Alternative B would be less than significant, including at the roadway segment of Campus Drive from MacArthur Boulevard to Von Karman Avenue. Due to the reduced development capacity, the average daily trips would be reduced, and Alternative B would not exceed traffic-noise thresholds. Additionally, similar to the proposed Project, Alternative B would introduce less residential uses proximate to John Wayne Airport, specifically the 60 dBA to 65 dBA CNEL noise contour where residential uses are “conditionally consistent” and the 65 dBA to 70 dBA CNEL noise contour where residential uses are “normally inconsistent.” Future housing development projects under Alternative B would be required to demonstrate compliance with established City policies concerning airport noises and AELUP requirements. Both Alternative B and the proposed Project would result in less than significant impacts for construction and operations.

Population and Housing

Under both the proposed Project and Alternative B, population is anticipated to increase in the City beyond growth projections of the General Plan and SCAG’s Connect SoCal. Alternative B would facilitate the development of additional housing throughout the City, inducing indirect population growth in the City beyond existing conditions and growth planned under the General Plan. Alternative B would also be consistent with State law requires that the City accommodate its RHNA “fair share” of the region’s housing needs. Alternative B would result in proportionally less population growth than the proposed Project due to a reduced overall development capacity but would still exceed planned growth for the City. Based on the thresholds of significance set forth in this Program, neither the proposed Project nor Alternative B would result in significant impacts. However, Alternative B would introduce fewer new residents into the City.

Public Services

Alternative B assumes additional housing on the identified 247 housing sites, but with a lower overall development capacity resulting in lower population growth when compared to the proposed Project. A

majority of the housing sites are currently developed and/or located in developed areas of the City, and served by existing public services. Similar to the proposed Project, Alternative B would have no immediate impacts on public services and would not result in a need for expanded or newly constructed facilities, and impacts associated with services would be less than significant. Future housing projects would be subject to the City's development review process and like the proposed Project would be required to comply with applicable General Plan policies and Municipal Code requirements. For example, compliance with Land Use Element Policies LU 2.8 and LU 3.2 require that land uses can be adequately supported by public services, transportation, and utility infrastructure.

The operating budget for public services including fire protection, police services, and libraries is generated primarily through tax revenues. Facilities, personnel, and equipment expansion and acquisition are tied to the City budget process and tax-base expansion. New development would be subject to Municipal Code Section 3.12 (Property Development Tax), which imposes an excise tax upon the construction and occupancy of each residential unit, commercial unit, industrial unit, and mobile home park in the City per square foot of gross floor area for all classes of new construction, including any area in a building designed for the parking of vehicles. Per Municipal Code Section 3.12.110 (Disposition of Proceeds – Funds Created), all tax proceeds would be used for acquiring, building, improving, expanding, and equipping City fire stations, City libraries and City parks. All future housing development facilitated by the Project and Alternative B would be subject to the City's development review process, which may include review pursuant to CEQA, and would be assessed on a project-specific basis for potential effects concerning the secondary effects of population growth, including but not limited to the need for public service improvements.

With respect to schools, schools in the Newport-Mesa Unified School District and Santa Ana Unified School District are currently operating below maximum capacity and have space to accommodate additional students. As Alternative B would have a reduced development capacity, additional students generated under both the Project and Alternative B could be served. Furthermore, the State of California is responsible for the funding of public schools. Future projects under both the Project and Alternative B would be required to pay fees, as required by California Government Code Sections 65995-65998, to offset impacts from increased demand for school services associated with development of the proposed Project by providing an adequate financial base to construct and equip new and existing schools.

Impacts would be less than significant under both the proposed Project and Alternative B. However, as the overall development capacity would be reduced under Alternative B, the resulting population and housing growth would be reduced resulting in a proportionally lesser demand for public services.

Recreation

Alternative B would introduce additional housing and population to the City that could result in increased demand for or impacts on recreational facilities or services. Like the proposed Project, future housing development projects under Alternative B would be subject to project-specific review and would be required to comply with the goals and policies in the City's General Plan and Municipal Code requirements, as applicable to the individual project. Where any future housing development would include the subdivision of land, the housing project would be required to provide land or in lieu fees for parks or recreation purposes to bear a reasonable relationship to the use of the park and recreational facilities by future inhabitants pursuant to Municipal Code Section 19.52.030 (Use of Park Dedications and Fees). Any land, fees, or combination thereof contributed would be required to be used for developing new or rehabilitating existing park and recreational facilities to serve the subdivision.

With respect to the maintenance and preservation of existing parks and recreation facilities (General Plan Goal R 2), General Plan Policy R 2.1 states “Use funding from the City’s Park Dedication Fee Ordinance to enhance existing parks and recreational facilities.” In addition to compliance with Policy R 2.1 to mitigate impacts to existing park facilities, the General Plan places additional park and recreational requirements on high-density residential developments in the City (Policy R.2) and for residential development in the Airport Area (Policy LU 6.15.13 and Policy LU 6.15.16).

While the maximum development capacity would be reduced under Alternative B, future development could increase the use of existing parks and recreational facilities. It is reasonable to assume that not all of the future housing projects would be subject to payment of park fees because not all projects would require a subdivision. While there would be an increased use of parkland and recreational facilities resulting from the increase in residential population, the City provides for the maintenance and enhancement of parks and recreational facilities through various funding sources. These existing funding sources currently include, in addition to the Park Dedication Fee Ordinance, property taxes, and long-term Facility and Park Plans funding sources. Because of the City’s commitment to the maintenance and enhancement of such facilities and exploration of potential future funding sources, increased use of existing parks and recreational facilities would not result in substantial physical degradation. Consistent with the findings for the proposed Project, impacts would be less than significant.

Transportation

The proposed Project would decrease the amount of travel per individual that is forecast to occur in comparison to the existing conditions and in comparison to General Plan Buildout VMT. This is because the proposed Project would develop more housing proximate to where employment is located. In areas with a mix of residential and employment uses, VMT/SP is generally lower than in areas that have more uniform land uses. Alternative B would allow for future residential development on the 247 housing site but with a reduced development capacity and would generate less daily traffic.

Like the proposed Project, Alternative B would allow for the introduction of housing within areas that are currently characterized by predominantly office uses, resulting in a more balanced land uses resulting in a lower VMT/SP than General Plan building without either the Project or Alternative B. As noted for the proposed Project, because of differences in the mix of land uses within different TAZs, the VMT/SP could be lower or higher when compared to the assumptions for the Project as a whole. Although Alternative B could result in fewer units on the housing sites, it is expected that Alternative B would still improve VMT/SP compared to General Plan buildout but less than for the proposed Project. For both the proposed Project and Alternative B, future housing projects that do not satisfy the VMT screening criteria would be required to prepare a full VMT analysis to determine whether the site-specific project would have a significant VMT impact.

Tribal Cultural Resources

Although overall development capacity would be reduced under Alternative B, housing development on each of the 247 housing sites would be allowed. Similar to the proposed Project, Alternative B would have the potential to impact tribal cultural resources and to disturb human remains from ground disturbing activities. Following compliance with General Plan policies and **MM TCR-1** and **MM TCR-2**, both the Project and Alternative B would have a less than significant impact on tribal cultural resources.

Utilities and Service Systems

Alternative B would introduce additional housing and population to the City that could result in increased demand for potable water resources, generate additionally wastewater and solid waste, and require additional electric, natural gas and telecommunication resources. However, demand on utilities and service systems would be incrementally reduced under Alternative B due to the reduced overall development capacity. Similar to the proposed Project, Alternative B would result in a less than significant impact related to the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunication facilities following compliance with the General Plan policies and **SC UTIL-1** through **SC UTIL-3**. However, despite compliance with federal, State, and local requirements, the water demands from future development facilitated by Alternative B would result in a significant and unavoidable impact concerning water supply, as population growth and water demand associated with proposed housing development were not accounted for in the three water district UWMPs, whose service areas include Newport Beach. When compared to the proposed Project, demand on utilities and service systems associated with Alternative B would be incrementally reduced.

Wildfire

Like the proposed Project, Alternative B assumes future housing development on housing site 131 and 336 which are located within a VHFHSZ. However, Alternative B may have fewer housing units on housing sites 131 and 336. The remaining housing sites would be located outside FHSZs. However, compliance with federal, state, and local laws and regulations, and implementation of **MM W-1** would ensure that impacts to the public and environment related to risk of hazards due to urban fires would be less than significant for both the proposed Project and Alternative B concerning wildfire.

Feasibility and Ability to Meet Project Objectives

Alternative B would facilitate future residential development on the 247 housing sites, but would include fewer units to serve as a buffer to address future “no net loss” to preclude the potential need to identify replacement sites associated with the 6th Cycle RHNA. Alternative B would meet the Project’s objective to ensure compliance with State housing law and implementation of the 2021–2029 Housing Element, including an update to the City’s Land Use Element goals and policies and the adoption of Housing Opportunity Zones. However, as Alternative B would include a reduced buffer, should the City have an insufficient number of remaining sites to meet its RHNA obligations in the income categories resulting in a net loss, the City would have 120 days to provide rezoning that accommodates the net loss. Although Alternative B would adopt state-mandated and locally desired programs to implement the City’s Housing Element, it would not provide a buffer to address “no net loss” to the same extent as the proposed Project.

Conclusion

Potential impacts from implementation of Alternative B would be similar to the proposed Project for a majority of resource areas, and impacts would remain significant and unavoidable for air quality, cultural resources (historic resources), GHG emissions, recreation, and utilities and service systems (water supply). Alternative B would not have a significant unavoidable roadway noise impact. Under Alternative B, while the City could meet its 6th Cycle RHNA allocation from future development on the housing sites, there would be greater risk of penalties and noncompliance with various State housing-related laws in case housing sites were removed from the inventory during the planning period or sufficient sites were not available to meet the RHNA at specified levels of affordability .

6.4.3 Alternative C: RHNA Only

Description of the Alternative

Alternative C assumes a maximum development capacity of 4,845 housing units, which is the City's 6th Cycle RHNA allocation. Following certification by HCD, the City is required to ensure the continued and effective implementation of the Housing Element programs including, but not limited to, the provision of sufficient adequately zoned land to accommodate its share of the regional growth and its required share of lower income dwelling units consistent with the General Plan and RHNA obligations. The City is obligated to ensure there is no net loss when projects are developed such that there are adequate opportunities for the City to meet its RHNA obligations, particularly in order to demonstrate that Low-Income and Very-Low-Income units are being constructed. Future housing applicants are not required to meet affordability goals, which could result in insufficient housing sites to comply with affordability requirements.

While a buffer is not required, it is recommended by HCD. Therefore, Alternative C assumes no buffer to address future "no net loss" if actual housing development does not provide Very-Low-Income and Low-Income housing consistent with the RHNA. Should the City have an insufficient number of remaining sites to meet its RHNA obligations in the income categories resulting in a net loss, the City has 120 days to provide rezoning that accommodates the net loss. This alternative would represent an approximate 50 percent reduction in overall development capacity as compared to the proposed Project. This alternative would still require amendments/updates to the General Plan Land Use Element policies, Municipal Code, and Local Coastal Program. It is not possible to know which combination of housing sites would be developed at what densities.

This alternative was selected for analysis because it would result in a lower intensity of development that could lessen some of the Project's environmental effects. It would not, however, substantially lessen or eliminate the Project's significant and unavoidable effects for the reasons discussed further below. Nevertheless, the alternative was selected for analysis because it could potentially meet the City's RHNA obligations and Project objective of implementing the City's 2021-2029 Housing Element, while lessening some of the proposed Project's effects.

Impact Comparison to the Proposed Project

Aesthetics

Alternative C would result in a lower overall development capacity and could result in fewer visual changes than the Project due to less intense housing development. However, like the proposed Project, Alternative C assumes that residences could be constructed in the future on the 247 housing sites throughout the City. If sites are developed at a lower density, building heights could be similar or the same as for the proposed Project consistent with the Housing Opportunity Zone building height standards. Housing development would be subject to the City's development review process including review with applicable General Plan policies, Municipal Code standards, and proposed *Multi-Unit Objective Design* Standards to minimize the potential for significant impacts concerning scenic resources and lighting/glare, with the exception of Banning Ranch. Like the proposed Project, Alternative C would facilitate future housing development within Banning Ranch, as the 2021-2029 Housing Element identifies housing sites within the Banning Ranch Focus Area. The General Plan EIR found that development of Banning Ranch would have a "substantial increase of lighting" and no feasible mitigation was available to reduce the impact. With the exception of significant, unavoidable lighting impacts associated with Banning Ranch, potential impacts

associated with the topic of Aesthetics would be less than significant for both the proposed Project and Alternative C.

Air Quality

Alternative C would result in a lower maximum development capacity (50% reduction) and could result in fewer air quality impacts as compared to the proposed Project. Alternative C assumes the adoption of Housing Overlay Zones to facilitate future development of housing on identified housing sites throughout the City. Similar to the Project, future development would result in air quality emissions, and SCAQMD Rules and any applicable measures would be applied to residential projects in order to minimize those potential negative air quality effects. However, due to the intensity of proposed development and addition of 4,845 residential units to the City, Alternative C would similarly conflict with the existing growth assumptions in the AQMP and would exceed the SCAQMD daily emissions thresholds during long-term operations. Air quality emissions would be proportionally reduced as compared to the proposed Project, but potential impacts to air quality would remain significant and unavoidable.

Biological Resources

Although maximum development capacity would be reduced under Alternative C, housing development on the 247 housing sites could occur. Following compliance with General Plan policies and **MM BIO-1**, both the Project and Alternative C's potential impacts to special-status species habitats, riparian habitats or other sensitive communities, and wetlands would be reduced to less than significant levels. Under Alternative C, although the maximum capacity would be reduced, these sites would have the potential to be developed with housing and as such would result in a similar impact to biological resources as the proposed Project.

Cultural Resources

Although overall development capacity would be reduced under Alternative C, housing development on the 247 housing sites is assumed. Similar to the proposed Project, Alternative C would have the potential to impact historic or archaeological resources and to disturb human remains from ground disturbing activities. Following compliance with City Council and General Plan policies, **SC CUL-1** and **SC CUL-2**, and **MM CUL-1** and **MM CUL-2**, both the Project and Alternative C would have a less than significant impact on archeological resources. However, potential impacts to historic resources would remain significant and unavoidable.

Energy

Alternative C would demand less total energy (50% reduction) than the Project given this alternative assumes a lower maximum development capacity. Similar to the Project, future development would result in more-energy efficient development because Title 24 standards continue to be modified to include more energy efficiency requirements. Overall, Alternative C would result in less intense housing development and proportionally reduced energy consumption. However, under both development scenarios, neither would not conflict with plans for energy efficiency or result in the wasteful use of energy.

Geology and Soils

Although maximum development capacity would be reduced under Alternative C, housing development is assumed on the 247 housing sites, including the 31 housing sites located within liquefaction susceptibility zones and the 17 housing sites within landslide susceptibility zones. Alternative C would result in comparable impacts involving geology, soils, and paleontological resources as the Project, given

the housing sites are the same. Both the proposed Project and Alternative C would be subject to compliance with General Plan, Municipal Code, and Local Coastal Program policies, and **SC GEO-1**. Both the Proposed Project and Alternative C would have less than significant impacts with respect to geology, soils, and paleontological resources.

Greenhouse Gas Emissions

Alternative C would result in a reduced development capacity and could result in fewer GHG emission impacts as compared to the proposed Project. Similar to the Project, future housing development under Alternative C would result in increased GHG emissions and future developments would be evaluated on a project-by-project. Development under Alternative C or the proposed Project scenarios would be subject to applicable General Plan policies and would be required to implement **MM GHG-1**. Greenhouse gas emissions would be proportionally less than the proposed Project due to a reduced overall development capacity, but potential impacts to GHG emissions would remain significant and unavoidable due to the scale of housing development and growth beyond assumptions of the General Plan and SCAG's Connect SoCal.

Hazards and Hazardous Materials

Although overall development capacity would be reduced under Alternative C, housing development on each of the 247 housing sites is assumed under this scenario. Similar to the proposed Project, compliance with established General Plan and Municipal Code policies would minimize impacts from the routine transport, use, and disposal of hazardous materials and from reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Alternative C would have similar impacts concerning demolition, transport, or disposal of hazardous materials associated with potential demolition, grading, and construction activities necessary (on a site-by-site basis) consistent with the existing General Plan and zoning.

With regards to operations, future development on housing sites under both the proposed Project and Alternative C would be required to comply with applicable building and fire safety regulations required for the design of new housing and emergency access and impacts would be less than significant. With respect to proximity to John Wayne Airport, Alternative C assumes that less housing could be constructed in the future in the Airport Area Focus Area because this alternative would have a lower overall development capacity. However, like the proposed Project, residential development would be allowed in various Safety Zones. For those housing sites in Safety Zone 6, residential uses are allowed and would not impact the standards or operations of this zone. For those housing sites exclusively in Safety Zone 4, the AELUP for John Wayne Airport states that higher densities as infill in urban areas if alternative uses are impractical. For the four housing sites – 70, 360, 363, and 367 – that are partially within Safety Zone 3, housing development would be limited to low-density residential uses as identified in the R-1 zoning district. Therefore, impacts would be less than significant for both the Project and Alternative C.

Hydrology and Water Quality

Although maximum development capacity would be reduced under Alternative C, housing development on each of the 247 housing sites would still be allowed. Similar to the proposed Project, future housing development under Alternative C would be required to demonstrate compliance with water quality standards through compliance with all applicable local, State, federal regulatory requirements. As with the Proposed Project, this alternative would not deplete groundwater supplies or interfere with

groundwater recharge. Impacts for both the proposed Project and Alternative C would be less than significant.

Land Use and Planning

Alternative C would facilitate housing development on the identified housing sites through the adoption of General Plan, zoning, and Local Coastal Program amendments, similar to the proposed Project. Development under Alternative C would redevelop existing sites or introduce housing on predominately infill housing sites in urbanized portions of the City and would not divide the community with projects that typically create physical divisions or separation within cities such as freeways or other large infrastructure projects that divide one portion of a City from another. Alternative C would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigation an environmental effect. Neither the proposed Project nor Alternative C would result in significant land use impacts.

Noise

Although overall development capacity would be reduced under Alternative C, housing development within each of the 247 housing sites would still be allowed. Construction activities associated with any individual development could also occur near noise-sensitive receptors and noise disturbances and excessive groundborne vibration/noise levels, could occur for prolonged periods of time. However, individual developments would be subject to compliance with Municipal Code Section 10.28.040 (Construction Activity – Noise Regulations) and Municipal Code Section 10.26.035(D), and would not result in significant impacts concerning noise for either the Project or Alternative C.

Operational traffic noise impacts associated with Alternative C would be less than significant, including at the roadway segment of Campus Drive from MacArthur Boulevard to Von Karman Avenue. Due to the reduced development capacity, the average daily trips would be reduced, and Alternative C would not exceed traffic-noise thresholds. Additionally, like the proposed Project, Alternative C would introduce less residential uses proximate to John Wayne Airport, specifically the 60 dBA to 65 dBA CNEL noise contour where residential uses are “conditionally consistent” and the 65 dBA to 70 dBA CNEL noise contour where residential uses are “normally inconsistent.” Future housing development projects under Alternative C would be required to demonstrate compliance with established City policies concerning airport noises and AELUP requirements. Both Alternative C and the proposed Project would result in less than significant impacts for construction and operations.

Population and Housing

Under both the proposed Project and Alternative C, population is anticipated to increase in the City beyond growth projections of the General Plan and SCAG’s Connect SoCal. Alternative C would facilitate the development of additional housing throughout the City, inducing indirect population growth in the City beyond existing conditions and growth planned under the General Plan. Alternative C would also be consistent with State law requires that the City accommodate its RHNA “fair share” of the region’s housing needs. Alternative C would result in proportionally less population growth than the proposed Project due to a lower maximum development capacity but would still exceed planned growth for the City. Based on the thresholds of significance set forth in this Program, neither the proposed Project nor Alternative C would result in significant impacts. However, Alternative C would introduce fewer new residents into the City.

Public Services

Alternative C assumes additional housing to the City on the identified 247 housing sites, but with at a lower overall development capacity resulting in lower population growth when compared to the proposed Project. A majority of the housing sites are currently developed and/or located in developed areas of the City, and served by existing public services. Similar to the proposed Project, Alternative C would have no immediate impacts on public services and would not result in a need for expanded or newly constructed facilities, and impacts associated with services would be less than significant. Future housing projects would be subject to the City's development review process and like the proposed Project would be required to comply with applicable General Plan policies and Municipal Code requirements. For example, compliance with Land Use Element Policies LU 2.8 and LU 3.2 require that land uses can be adequately supported by public services, transportation, and utility infrastructure.

The operating budget for public services including fire protection, police services, and libraries is generated primarily through tax revenues. Facilities, personnel, and equipment expansion and acquisition are tied to the City budget process and tax-base expansion. New development would be subject to Municipal Code Section 3.12 (Property Development Tax), which imposes an excise tax upon the construction and occupancy of each residential unit, commercial unit, industrial unit, and mobile home park in the City per square foot of gross floor area for all classes of new construction, including any area in a building designed for the parking of vehicles. Per Municipal Code Section 3.12.110 (Disposition of Proceeds – Funds Created), all tax proceeds would be used for acquiring, building, improving, expanding, and equipping City fire stations, City libraries and City parks. All future housing development facilitated by the Project and Alternative C would be subject to the City's development review process, which may include review pursuant to CEQA, and would be assessed on a project-specific basis for potential effects concerning the secondary effects of population growth, including but not limited to the need for public service improvements.

With respect to schools, schools in the Newport-Mesa Unified School District and Santa Ana Unified School District are currently operating below maximum capacity and have space to accommodate additional students. As Alternative C would have a reduced development capacity, additional students generated under both the Project and Alternative C could be served. Furthermore, the State of California is responsible for the funding of public schools. Future projects under both the Project and Alternative C would be required to pay fees, as required by California Government Code Sections 65995-65998, to offset impacts from increased demand for school services associated with development of the proposed Project by providing an adequate financial base to construct and equip new and existing schools.

Impacts would be less than significant under both the proposed Project and Alternative C. However, as the overall development capacity would be reduced under Alternative C, the resulting population and housing growth would be reduced resulting in a proportionally lesser demand for public services.

Recreation

When compared to the proposed Project, Alternative C would introduce less housing and population to the City that could result in increased demand for or impacts on recreational facilities or services. Future housing development projects under Alternative C would be subject to project-specific review and would be required to comply with the goals and policies in the City's General Plan and Municipal Code requirements, as applicable to the individual project. Where any future housing development would include the subdivision of land, the housing project would be required to provide land or in lieu fees for

parcs or recreation purposes to bear a reasonable relationship to the use of the park and recreational facilities by future inhabitants pursuant to Municipal Code Section 19.52.030 (Use of Park Dedications and Fees). Any land, fees, or combination thereof contributed would be required to be used for developing new or rehabilitating existing park and recreational facilities to serve the subdivision.

With respect to the maintenance and preservation of existing parks and recreation facilities (General Plan Goal R 2), General Plan Policy R 2.1 states “Use funding from the City’s Park Dedication Fee Ordinance to enhance existing parks and recreational facilities.” In addition to compliance with Policy R 2.1 to mitigate impacts to existing park facilities, the General Plan places additional park and recreational requirements on high-density residential developments in the City (Policy R.2) and for residential development in the Airport Area (Policy LU 6.15.13 and Policy LU 6.15.16).

While the maximum development capacity would be reduced under Alternative C to only accommodate the City’s RHNA allocation, future development could increase the use of existing parks and recreational facilities. While there would be an increased use of parkland and recreational facilities resulting from the increase in residential population, the City provides for the maintenance and enhancement of parks and recreational facilities through various funding sources. These existing funding sources currently include, in addition to the Park Dedication Fee Ordinance, property taxes, and long-term Facility and Park Plans funding sources. Because of the City’s commitment to the maintenance and enhancement of such facilities and exploration of potential future funding sources, increased use of existing parks and recreational facilities would not result in substantial physical degradation. Consistent with the findings for the proposed Project, impacts would be less than significant.

Transportation

The proposed Project would decrease the amount of travel per individual that is forecast to occur in comparison to the existing conditions and in comparison to General Plan Buildout VMT. This is because the proposed Project would develop more housing proximate to where employment is located. In areas with a mix of residential and employment uses, VMT/SP is generally lower than in areas that have more uniform land uses. Alternative C would allow for future residential development on the 247 housing site but with a 50 percent reduced development capacity and would generate less daily traffic.

Like the proposed Project, Alternative C would allow for the introduction of housing within areas that are currently characterized by predominantly office uses, resulting in a more balanced land uses resulting in a lower VMT/SP than General Plan buildout without either the Project or Alternative C. As noted for the proposed Project, because of differences in the mix of land uses within different TAZs, the VMT/SP could be lower or higher when compared to the assumptions for the Project as a whole. Although Alternative C could result in fewer units on the housing sites because it only assumes compliance with the City’s RHNA allocation with no buffer, it is expected that Alternative C would still improve VMT/SP compared to General Plan buildout but less than for the proposed Project. For both the proposed Project and Alternative C, future housing projects that do not satisfy the VMT screening criteria would be required to prepare a full VMT analysis to determine whether the site-specific project would have a significant VMT impact.

Tribal Cultural Resources

Although overall development capacity would be reduced under Alternative C, housing development on each of the 247 housing sites would still be allowed. Similar to the proposed Project, Alternative C would have the potential to impact tribal cultural resources and to disturb human remains from ground

disturbing activities. Following compliance with General Plan policies and **MM TCR-1** and **MM TCR-2**, both the Project and Alternative C would have a less than significant impact on tribal cultural resources.

Utilities and Service Systems

Alternative C would introduce additional housing and population to the City that could result in increased demand for potable water resources, generate additionally wastewater and solid waste, and require additional electric, natural gas and telecommunication resources. However, demand on utilities and service systems would be incrementally reduced under Alternative C due to the reduced overall development capacity. Similar to the proposed Project, Alternative C would result in a less than significant impact related to the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunication facilities following compliance with the General Plan policies and **SC UTIL-1** through **SC UTIL-3**. However, despite compliance with federal, State, and local requirements, the water demands from future development facilitated by Alternative C would result in a significant and unavoidable impact concerning water supply, as population growth and water demand associated with proposed housing development were not accounted for in the three water district UWMPs, whose service areas include Newport Beach. When compared to the proposed Project, demand on utilities and service systems associated with Alternative C would be incrementally reduced.

Wildfire

Similar to the proposed Project, Alternative C assumes housing development on housing sites 131 and 336 which are located within a VHFHSZ. However, Alternative C may have fewer housing units on housing sites 131 and 336. The remaining housing sites would be located outside FHSZs. However, compliance with federal, state, and local laws and regulations, and implementation of **MM W-1** would ensure that impacts to the public and environment related to risk of hazards due to urban fires would be less than significant for both the proposed Project and Alternative C concerning wildfire.

Feasibility and Ability to Meet Project Objectives

Alternative C would facilitate future residential development on 247 identified housing sites, but would not include any housing units to serve as a buffer to address future “no net loss” to preclude the need to identify replacement sites during 6th Cycle implementation. Alternative C would meet the Project’s objective to ensure compliance with State housing law and implementation of the 2021–2029 Housing Element, including goal and policy modifications City’s Land Use Element and adoption of Housing Opportunity Zones. However, as Alternative C does not include a buffer, should the City have an insufficient number of remaining sites to meet its RHNA obligations in the income categories resulting in a net loss, the City would have 120 days to provide rezoning that accommodates the net loss or risk conflicting with State law and the Project objectives.

Conclusion

Due to the intensity of development and consistency of identified housing sites, potential impacts from implementation of Alternative C would be similar or less than the proposed Project for a majority of resource areas because fewer housing units are assumed. Impacts would remain significant and unavoidable for air quality, cultural resources (historic resources), GHG emissions, and utilities and service systems (water supply assumptions). Alternative C eliminate significant, unavoidable roadway noise impacts. Under Alternative C, while the City may be able to meet its 6th Cycle RHNA allocation from future development on identified housing sites, it is important to note that future housing applicants are not

required to meet affordability goals. State Housing laws require cities and counties to identify RHNA obligations by income category. The City is obligated to ensure there is no net loss when projects are developed such that there are adequate opportunities for the City to meet its RHNA obligations, particularly in order to demonstrate that Low-Income and Very-Low-Income units are being constructed. Therefore, while Alternative C would reduce environmental impacts when compared to the proposed Project, it is reasonable to assume that the City may not meet its RHNA obligations in the various income categories and be required to rezone additional sites.

6.5 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. **Table 6-1: Comparison of Project Alternatives**, summarizes the comparative analyses presented in this section to the proposed Project.

“No Project” Alternative (Alternative A): The No Project Alternative would result in fewer impacts than the Project. Although this Alternative could reduce environmental impacts from future housing development facilitated by the Project, Alternative A would not achieve the Project objectives. Alternative A would not provide adequate housing sites to meet the City’s 6th Cycle RHNA allocation or satisfy State housing law including AB 1397. Under Alternative A, the City would not meet its RHNA obligations. Therefore, this Alternative would directly conflict with California Government Code Section 65583, which stipulates that a jurisdiction must assess its Housing Element every eight years and identify adequate sites for housing and provide for the existing and projected needs of all economic segments of the community.

RHNA Only Alternative (Alternative C): This Alternative would meet the majority of the Project objectives as it is assumed that development under this alternative would meet the 6th Cycle RHNA housing needs. However, as Alternative C assumes no buffer, there is a higher chance that future rezonings would be required during the Housing Element planning period and that the City would be required to implement such actions within a 120 day period to address “no net loss,” should City have an insufficient number of remaining sites to meet its RHNA obligations in the income categories.

| Resource Area | Proposed Project | Alternative A No Project | Alternative B RHNA with Reduced Buffer | Alternative C RHNA Only |
|--|-------------------------|-------------------------------------|---|------------------------------------|
| Aesthetics | S/U | S/U | S/U | S/U |
| Air Quality | S/U | LS | S/U | S/U |
| Biological Resources | LS/M | LS/M | LS/M | LS/M |
| Cultural Resources | S/U | S/U | S/U | S/U |
| Energy | LS | LS | LS | LS |
| Geology and Soils | LS | LS | LS | LS |
| Greenhouse Gas Emissions | S/U | S/U | S/U | S/U |
| Hazards and Hazardous Materials | LS | LS | LS | LS |
| Hydrology and Water Quality | LS | LS | LS | LS |
| Land Use and Planning | LS | LS | LS | LS |
| Noise and Vibration | S/U | LS | LS | LS |
| Population and Housing | LS | LS | LS | LS |
| Public Services | LS | LS | LS | LS |
| Recreation | LS | LS | LS | LS |
| Transportation | LS | LS | LS | LS |
| Tribal Cultural Resources | LS | LS | LS | LS |
| Utilities and Service Systems | S/U | LS | S/U | S/U |
| Wildfire | LS | LS | LS | LS |
| Notes: LS = Less than Significant LS/M = Less than Significant with Mitigation S/U = Significant Unavoidable Impact | | | | |