



## **7.0 Alternatives to the Proposed Project**

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## 7.0 ALTERNATIVES TO THE PROPOSED PROJECT

CEQA requires that an EIR include an analysis of a range of project alternatives that could feasibly attain most of the basic project objectives, while avoiding or substantially lessening any of the significant effects identified for the proposed project. The Lead Agency must disclose its reasoning for selecting each alternative. The Lead Agency must also identify any alternatives that were considered, but rejected as infeasible during the scoping process, and disclose the reasons for the exclusion. The range of alternatives is governed by a “rule of reason,” which requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. Specifically, Section 15126.6(a) of the *CEQA Guidelines* requires that:

*“An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selection of a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.”*

Section 15126.6(f)(1) of the *CEQA Guidelines* provides the following information regarding the “feasibility” of a project alternative:

*“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.”*

Within every EIR, the *CEQA Guidelines* require that a “No Project” Alternative is analyzed. The “No Project” Alternative allows decision makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project. In addition, the identification of an “Environmentally Superior” Alternative is required. The “No Project” Alternative may be the “Environmentally Superior” Alternative to the proposed project based on the minimization or avoidance of physical environmental impacts. However, the “No Project” Alternative must also achieve most of the basic objectives of the projects in order to be considered the “Environmentally Superior” Alternative. Thus, the *CEQA Guidelines* require that if the “Environmentally Superior” Alternative is the “No Project” Alternative, the EIR shall identify a superior alternative from the remaining alternatives analyzed.

In order to provide background regarding the selection or rejection of a project alternative, the discussion below provides a summary of project objectives, in addition to a description of significant impacts that may apply to the project. An explanation behind each selected project alternative is



provided, in addition to a discussion of alternatives that were considered during the scoping process but not selected for further analysis.

Throughout the following analysis, impacts of the alternatives are analyzed for each of the issue areas examined in Section 5.0, *Environmental Analysis*, of this EIR. In this manner, each alternative can be compared to the proposed project on an issue-by-issue basis. Table 7-1, *Comparison of Alternatives*, which is provided at the end of this Section, provides an overview of the alternatives analyzed and a comparison of each alternative's impact in relation to the proposed project.

## 7.1 SUMMARY OF PROJECT OBJECTIVES

As stated above, an EIR must only discuss in detail an alternative that is capable of feasibly attaining most of the basic project objectives. Thus, a summary of project objectives is provided below:

1. Provide traffic improvements at the Brookhurst Street/Adams Avenue intersection consistent with the City's *Circulation Element* to alleviate the deficient forecast year 2030 without project condition (Level of Service [LOS] F) to an acceptable LOS (LOS D) under the forecast year 2030 with project condition.
2. Carry forward the City of Huntington Beach's responsibilities for the Brookhurst Street/Adams Avenue intersection under the *Memorandum of Understanding (MOU) C-6-0834 Among Cities of Costa Mesa, Fountain Valley and Huntington Beach and the Orange County Transportation Authority Regarding Agency Responsibilities for Implementing the Consensus Recommendation for the Garfield-Gisler Bridge Crossing over the Santa Ana River*.
3. Carry out proposed improvements that incorporate a design and construction methodology that minimize impacts to surrounding residents and businesses.
4. Alleviate existing and forecast traffic congestion at the Brookhurst Street/Adams Avenue intersection and improve mobility for travelers within the City and surrounding areas.

## 7.2 SUMMARY OF SIGNIFICANT IMPACTS

Pursuant to Section 15126.6(a) of the *CEQA Guidelines*, an EIR shall describe a range of reasonable alternatives to 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. Only those impacts found significant and unavoidable are relevant in making the final determination of whether an alternative is environmentally superior or inferior to the proposed project. As noted within Section 5 of this EIR, the project would result in a significant and unavoidable impact related to inadequate parking capacity at the US Bank property located on the southeast corner of the intersection of Brookhurst Street and Adams Avenue. While Mitigation Measure LU-2 would be implemented by the City in an attempt to replace as many parking spaces on the property as possible, this replacement parking cannot be guaranteed since the consent of the property owner would be required. Thus, this analysis conservatively assumes that affected parking would not be replaced and that a significant and unavoidable parking impact would occur.



## 7.3 ALTERNATIVES CONSIDERED BUT NOT CARRIED FORWARD FOR ADDITIONAL ANALYSIS

In determining an appropriate range of alternatives to be evaluated in the EIR, three possible alternatives were considered but not carried forward for additional analysis, since they could not accomplish most of the basic objectives of the project or were considered infeasible. These development scenarios include the following:

### “ALTERNATIVE SITE” ALTERNATIVE

An “Alternative Site” for this project would not be applicable as the necessary improvements are specific to the Brookhurst Street/Adams Avenue intersection per the City’s *General Plan Circulation Element* and the *Memorandum of Understanding C-6-0834 Among Cities of Costa Mesa, Fountain Valley and Huntington Beach and the Orange County Transportation Authority Regarding Agency Responsibilities for Implementing the Consensus Recommendation for the Garfield-Gisler Bridge Crossing over the Santa Ana River*. The selection of an alternative site would conflict with the primary objective of the project and would not carry forward the City’s responsibilities for the Brookhurst Street/Adams Avenue intersection under the *Circulation Element* and *Memorandum of Understanding*. As such, this alternative has not been carried forward for further analysis.

### “12-FOOT TRAVEL LANE” ALTERNATIVE

The *Brookhurst Street and Adams Avenue Intersection Improvements, CC-1377 Project Report (Project Report)* (prepared by Harris & Associates, March 12, 2013 and included as [Appendix 13.7, Project Report](#), of this EIR) prepared for the proposed project analyzed two build alternatives, including the proposed project (10-foot travel lanes) and a 12-foot travel lane scenario. As such, based on the *Project Report*, the 12-Foot Travel Lane Alternative consists of widening all four legs of the Brookhurst Street/Adams Avenue intersection to provide three through lanes (12-foot lanes) along Brookhurst Street in both northbound and southbound directions, dual left turn lanes on both eastbound and westbound Adams Avenue, dual right turn lanes on eastbound Adams Avenue, and one right turn lane on westbound Adams Avenue.

The primary advantages of the 12-Foot Travel Lane Alternative are increased safety and vehicular driving comfort due to wider through lanes. However, the 12-Foot Travel Lane Alternative requires additional right-of-way (ROW) acquisition from adjoining commercial and residential properties, a longer construction schedule, and would move travel lanes closer to existing sensitive receptors in the project vicinity. All of the impacts identified under the proposed project in relation to land use/planning, traffic, air quality, greenhouse gases, noise, and hazards would still occur (most likely to a higher degree than the proposed project). The significant and unavoidable parking impact identified under the proposed project would remain. Since this Alternative would not have the capacity to reduce project-related impacts, it has not been carried forward for further analysis.

### “REDUCED LANE WIDTH” ALTERNATIVE

The Reduced Lane Width Alternative was considered as it would result in a smaller area of impact that would reduce the construction zone, minimize impacts to adjacent uses, and locate travel lanes



further from adjacent sensitive receptors. This Alternative would include a similar range of improvements to the Brookhurst Street/Adams Avenue intersection, but with a reduced lane width of nine feet. Generally, nine-foot wide travel lanes are considered the minimum standard for vehicle travel. Under this scenario, all design aspects of the project would remain the same with the exception of the reduced lane widths. The reduction in travel lane width would result in a corresponding reduction in the amount of ROW acquisition required from adjacent properties. The construction process and duration would generally remain the same. However, the City does not permit nine-foot wide travel lanes as they do not provide an adequate factor of safety. Both Brookhurst Street and Adams Avenue are major arterials that experience high levels of traffic, with buses and heavy trucks frequently utilizing the intersection. A nine-foot lane width would result in substantial traffic hazards during long-term operations. Thus, this Alternative is not considered feasible and has been rejected from further consideration.

## 7.4 “NO PROJECT” ALTERNATIVE

### DESCRIPTION OF ALTERNATIVE

Pursuant to *CEQA Guidelines* Section 15126.6(e)(2), the No Project Alternative must be analyzed within the EIR. The No Project Alternative should discuss what would be reasonably expected to occur in the foreseeable future if the proposed project were not approved, based on current plans and consistent with available infrastructure and community services. In certain instances, the No Project Alternative means “no build” wherein the existing environmental setting is maintained. Thus, this Alternative assumes that no intersection improvements would occur, and that the intersection would remain in its existing condition.

### IMPACT COMPARISON TO THE PROPOSED PROJECT

#### Land Use and Relevant Planning

Under the No Project Alternative, the Brookhurst Street/Adams Avenue intersection as well as the adjoining commercial and residential properties would remain in their current condition. Since no ROW acquisition would be required from adjoining properties, no new conflicts with landscaping, parking, or setback requirements of the Zoning Code would occur. Since the adjoining properties would not be impacted, no mitigation would be required. The No Project Alternative would avoid the project’s significant and unavoidable impact involving inadequate parking, since no ROW acquisition of existing parking areas would be required. Therefore, the No Project Alternative would be considered environmentally superior to the proposed project.

#### Traffic and Circulation

The No Project Alternative would not result in any short-term traffic impacts, as no construction workers would be traveling to the project site and no haul trucks would be required. However, the No Project Alternative would not address anticipated future operational deficiencies resulting from continued growth and increasing traffic levels. Under this Alternative, the intersection is projected to operate deficiently (LOS F) under the future year 2030 without project scenario. Thus, the No Project Alternative would result in increased traffic and circulation impacts in comparison to the



proposed project. The No Project Alternative would be considered environmentally inferior in this regard.

## Air Quality

The No Project Alternative would leave the Brookhurst Street/Adams Avenue intersection in its existing condition. No heavy equipment would be required for construction activities, no construction workers would travel to the site, no demolition would occur, and no excavation or truck hauling trips would occur. As such, no short-term construction emissions would be generated under this Alternative. As analyzed in [Section 5.3, \*Air Quality\*](#), there would be no difference in forecast year 2030 without and with project conditions with regard to vehicle miles traveled (VMT) and associated air quality emissions. However, the No Project Alternative would result in increased long-term localized CO emissions. Since the intersection is predicted to operate at LOS F for forecast year 2030, traffic congestion would worsen and would result in more localized CO emissions. In conclusion, although temporary short-term air quality impacts (over the course of approximately six months) would be avoided with this Alternative, the long term operational air quality emissions would be increased compared to the proposed project. Thus, since the long-range air quality benefits of the proposed project would not be realized, the No Project Alternative would be considered environmentally inferior to the proposed project.

## Greenhouse Gas Emissions

As noted above, the No Project Alternative would leave the Brookhurst Street/Adams Avenue intersection in its existing condition. No heavy equipment would be required, no construction workers would travel to the site, no demolition would occur, and no excavation or truck hauling trips would occur. As such, no construction-related greenhouse gas (GHG) emissions would be generated under this Alternative. As analyzed in [Section 5.4, \*Greenhouse Gas Emissions\*](#), there would be no difference in forecast year 2030 without and with project conditions with regard to VMT and associated GHG emissions. However, the No Project Alternative would result in increased long-term GHG emissions. Since the intersection is predicted to operate at LOS F for forecast year 2030, traffic congestion would worsen and would result in increased GHG emissions in comparison to the proposed project. In conclusion, although temporary short-term GHG emissions (over the course of approximately six months) would be avoided with this Alternative, the long term operational GHG emissions would be increased compared to the proposed project. Thus, since the long-range GHG benefits of the proposed project would not be realized, the No Project Alternative would be considered environmentally inferior to the proposed project.

## Noise

The No Project Alternative would not require construction activities. Therefore, no noise-generating construction equipment or haul trucks would be required, and no construction noise would occur. Additionally, although long-term growth and associated growth in traffic would occur in the vicinity of the intersection, the travel lanes would not be moved closer to adjoining residential and commercial uses. Thus, the No Project Alternative would not result in an increase in mobile noise sources. The No Project Alternative would be considered environmentally superior in this regard.



## Hazards and Hazardous Materials

The No Project Alternative would leave the Brookhurst Street/Adams Avenue intersection in its current condition. Therefore, no construction would occur, eliminating the potential to encounter existing hazardous materials associated with contaminated soil/groundwater, lead-based paints, Polychlorinated Biphenyls, or methane gas. Thus, the No Project Alternative is considered environmentally superior to the proposed project.

## ABILITY TO MEET PROJECT OBJECTIVES

The No Project Alternative would reduce land use, noise, and hazardous materials effects and would generally result in an overall decrease in impacts in comparison to the proposed project. The significant impact associated with parking would no longer occur under this Alternative since no existing parking areas would be affected. However, this Alternative would increase traffic, air quality, and GHG impacts and would not accomplish any of the stated project objectives. Since this Alternative would not implement planned improvements for the intersection under the *Circulation Element* and no actions outlined in the *Memorandum of Understanding* would be taken by the City, this Alternative would not achieve the project objectives.

## 7.5 “REDUCED RIGHT-OF-WAY” ALTERNATIVE

### DESCRIPTION OF ALTERNATIVE

The Reduced ROW Alternative would include a similar range of improvements to the Brookhurst Street/Adams Avenue intersection, but with reduced ROW acquisition at the following locations:

- The westbound right-turn pocket along Adams Avenue (onto Brookhurst Street) would be reduced in length from approximately 400 feet under the proposed project to 210 feet under this Alternative. This reduction in right-turn pocket length would reduce the amount of ROW acquisition required at the Ralphs’s property. Specifically, this Alternative would eliminate impacts to the Building E of the property (Comerica Bank, 10111 Adams Avenue), and no partial or full demolition of the structure would be required. The modified westbound right-turn pocket on Adams Avenue is depicted on Exhibit 7-1a, *Reduced ROW Alternative*; and
- The proposed sidewalk along the residential property at 20011 Lawson Lane would be reduced in width in order to eliminate the need to acquire ROW at this residential property. The existing block wall at 20011 Lawson Lane would remain in place. This narrowed ROW would reduce the proposed project’s 8-foot sidewalk to 5.4 feet at this location; refer to Exhibit 7-1b, *Reduced ROW Alternative*, for an illustration of this location. The vehicular travel way would remain unchanged from the proposed project and a narrowed sidewalk segment of 5.4 feet in width is acceptable under City standards.

All other aspects of this Alternative would remain the same as the proposed project. The Reduced ROW Alternative would be constructed using the same construction techniques and phasing. Only the two locations described above would vary from the proposed project.



This Alternative was selected since it would result in a smaller area of impact that would reduce the construction zone and minimize impacts to adjacent uses (including avoiding demolition of both the Comerica Bank building and block wall at 20011 Lawson Lane).

## **IMPACT COMPARISON TO THE PROPOSED PROJECT**

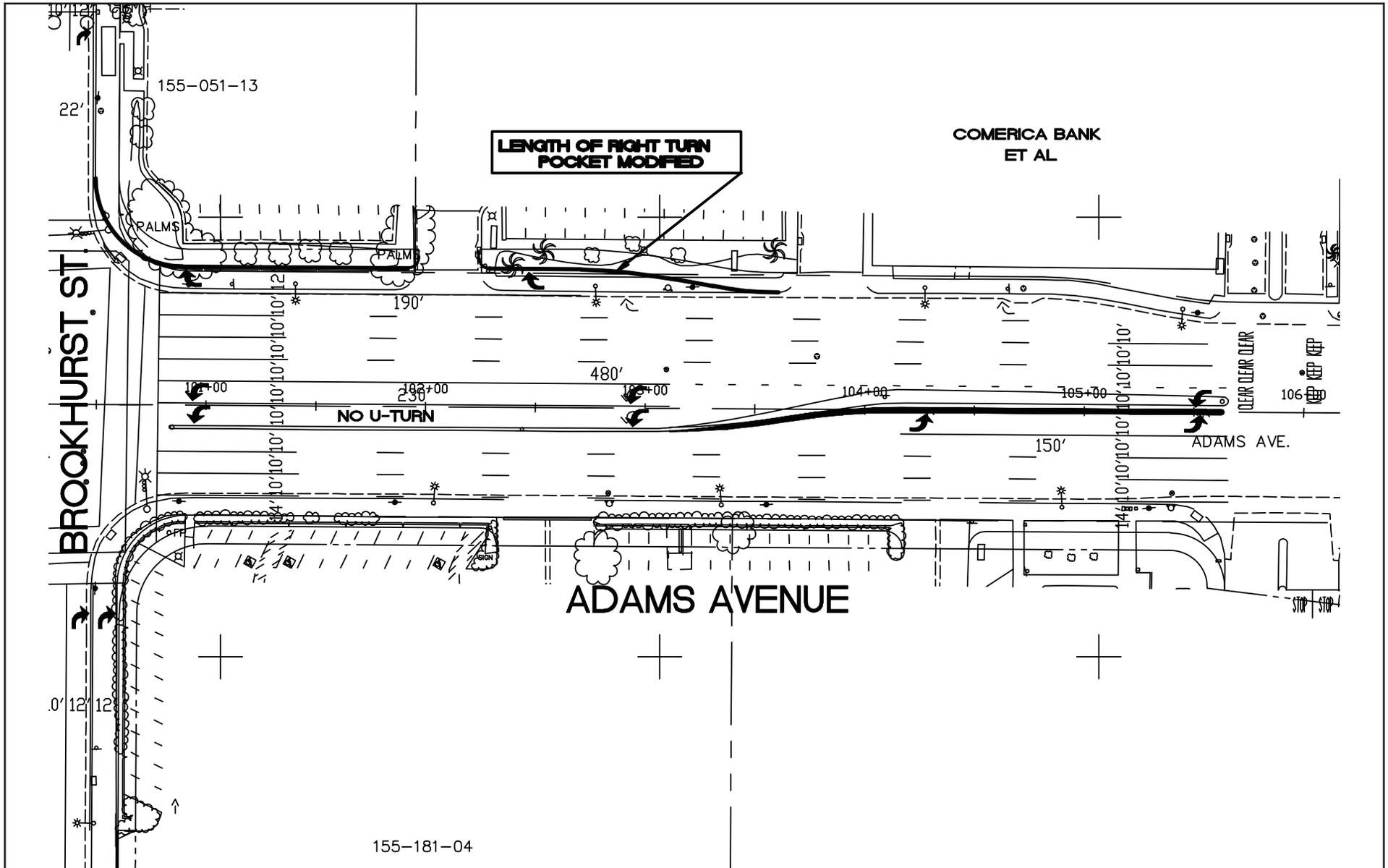
### **Land Use and Relevant Planning**

Under the Reduced ROW Alternative, land use and relevant planning impacts would be similar in comparison to the proposed project. Although ROW acquisition would be reduced to avoid impacts to structures, impacts to existing landscaping and parking spaces would remain similar to that considered for the proposed project. Thus, in comparison to the proposed project, incidences of non-compliance with the City's Zoning Code for landscaping, setbacks, and parking would remain and multiple Variances and/or mitigation measures would still be required in order to minimize impacts. Further, despite implementation of Variances and recommended mitigation, the project's significant and unavoidable impacts as a result of parking space removal would remain with this Alternative, since no reduction of ROW at the US Bank property would occur. Thus, the Reduced ROW Alternative is considered neither environmentally superior nor inferior to the proposed project.

### **Traffic and Circulation**

As noted above, the Reduced ROW Alternative would result in a similar design and capacity as the proposed project, but with a reduced right-turn pocket length along Adams Avenue (onto northbound Brookhurst Street). The reduction of ROW acquisition at the Lawson Lane property would not affect the vehicular travel way. The construction process and duration would also be similar to the proposed project. As such, short-term construction related traffic levels (construction worker trips, haul trips, etc.) would be similar. In addition, since the number of ultimate through lanes and turn lanes would be the same as the proposed project, long-term operational traffic and circulation impacts would be the same. With regard to potential queuing impacts from this Alternative, the right-turn pocket length would be reduced by approximately 190 feet (proposing a length of 210 feet rather than the proposed project's 400 feet) in order to avoid impacting the adjacent commercial structure (Building E) located at 10111 Adams Avenue. This would result in vehicles being temporarily blocked from entering the right-turn pocket at times when the vehicle queue extends beyond the length of the right-turn pocket. This is projected to occur at limited times during the afternoon peak period. Based on traffic analysis conducted by the City, the total impact would be minimal, with right turning vehicles being delayed on average an additional four seconds and the volume to capacity ratio of the intersection would remain unchanged. At most times of the day, this shortened pocket would have no increase in traffic/circulation impacts in comparison to the proposed project.

Although this Alternative would result in a slight increase of queuing at the intersection (by approximately four seconds), this increase is considered nominal and this Alternative is considered to be neither environmentally superior nor inferior to the proposed project.



Source: City of Huntington Beach, June 2013.

NOT TO SCALE

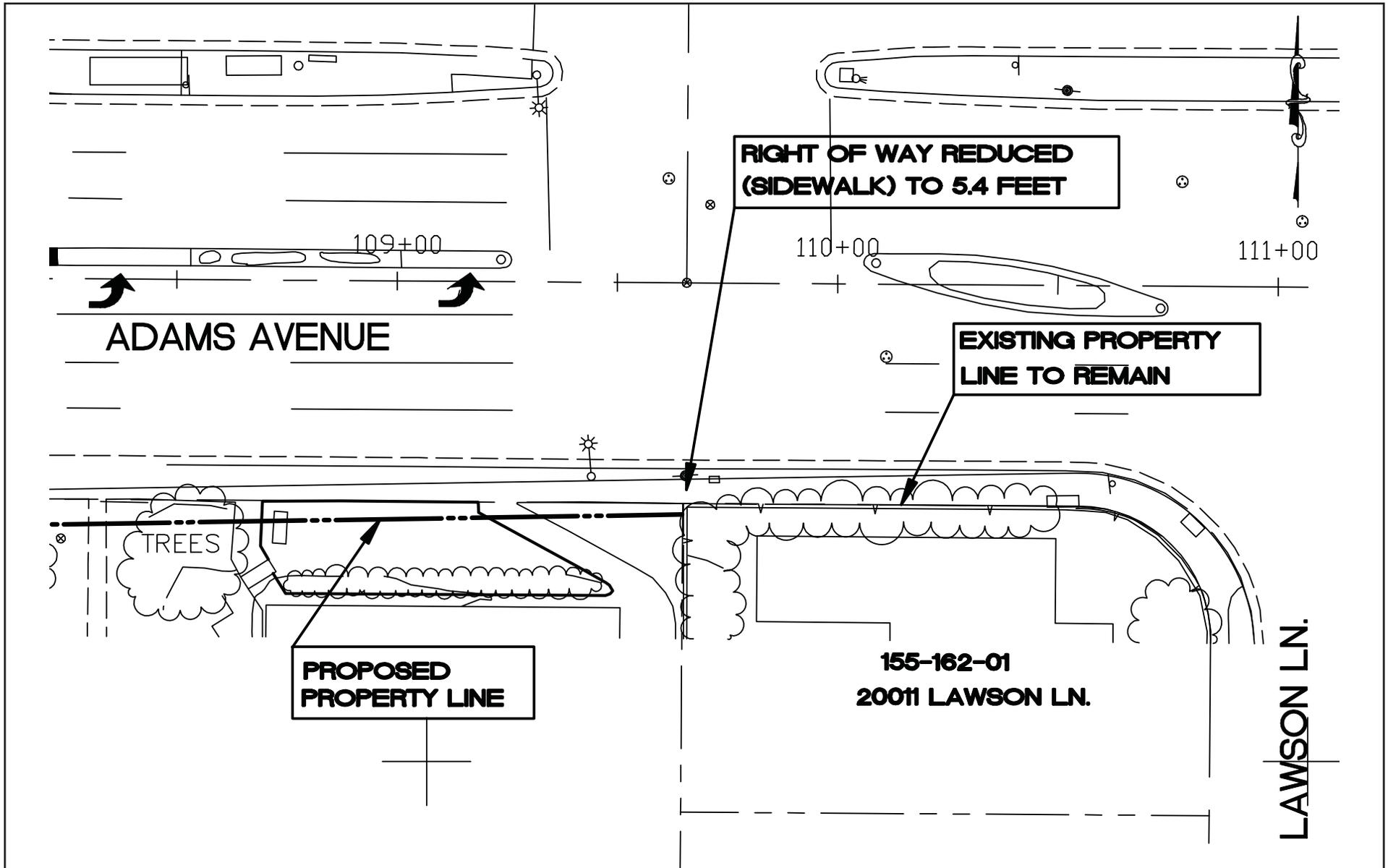


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ENVIRONMENTAL IMPACT REPORT  
BROOKHURST STREET/ADAMS AVENUE INTERSECTION IMPROVEMENTS

## Reduced ROW Alternative

Exhibit 7-1a



Source: City of Huntington Beach, June 2013.

NOT TO SCALE



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ENVIRONMENTAL IMPACT REPORT  
BROOKHURST STREET/ADAMS AVENUE INTERSECTION IMPROVEMENTS

## Reduced ROW Alternative

Exhibit 7-1b



## Air Quality

The Reduced ROW Alternative would generally result in similar impacts as the proposed project. As noted above, the construction process and duration would be similar to the proposed project. However, as the construction impact area would be reduced due to the elimination of the demolition of Building E on the Ralph's property and block wall at 20011 Lawson Lane, short-term air quality impacts would be reduced in comparison to the proposed project.

On an operational basis, air quality impacts would be the same since the number of ultimate through lanes and turn lanes would be similar to the proposed project and vehicle pollutant emissions would also be similar. Since the short-term construction emissions associated with the project would be reduced in comparison to the proposed project, the Reduced ROW Alternative is considered environmentally superior in this regard.

## Greenhouse Gas Emissions

The Reduced ROW Alternative would generally result in similar impacts as the proposed project in regards to GHG. As noted above, the construction process and duration would be similar to the proposed project. However, as construction activities would be reduced due to the elimination of the demolition of the Building E at the Ralph's property and block wall at 20011 Lawson Lane, short-term GHG emissions would be reduced in comparison to the proposed project.

On an operational basis, GHG impacts would be the same since the number of ultimate through lanes and turn lanes would be similar to the proposed project and vehicle pollutant emissions would also be similar. However, since the short-term construction GHG emissions associated with the project would be reduced in comparison to the proposed project, the Reduced ROW Alternative is considered environmentally superior in this regard.

## Noise

The Reduced ROW Alternative would result in similar noise impacts in comparison to the proposed project. As noted above, the construction process and duration would generally be the same as the proposed project. However, as the construction impact area would be reduced due to the elimination of the demolition of the Building E at the Ralph's property and block wall at 20011 Lawson Lane, short-term noise impacts would be reduced in comparison to the proposed project.

On an operational basis, noise impacts would generally be the same since the number of ultimate through lanes and turn lanes as well as vehicle volumes would be similar to the proposed project.

Since a reduction in short-term noise impacts would occur, the Reduced ROW Alternative is considered environmentally superior in comparison to the proposed project.

## Hazards and Hazardous Materials

The Reduced ROW Alternative would result in slightly decreased hazards/hazardous materials impacts in comparison to the proposed project. As stated above, the impact area associated with the project would be slightly reduced since ROW acquisition would be decreased and this Alternative would eliminate the need to demolish Building E on the Ralph's property and block wall at 20011



Lawson Lane. This would result in a reduction in the potential risk in unearthing/affecting existing hazardous materials within the project area during the short-term construction process.

Impacts during long-term operations would be similar to the proposed project, since the type of use (roadway infrastructure project) and the number of ultimate through lanes and turn lanes would be similar to the proposed project. Thus, the potential for any risks of upset resulting in adverse impacts during project operations would be the same.

Since the short-term construction impacts of the Reduced ROW Alternative would be decreased in comparison to the project, this alternative is considered environmentally superior in this regard.

## **ABILITY TO MEET PROJECT OBJECTIVES**

The Reduced ROW Alternative would reduce air quality, GHG, noise, and hazards and hazardous materials effects and would generally result in an overall decrease in impacts in comparison to the proposed project. However, similar land use/relevant planning and traffic/circulation impacts would result compared to the proposed project, and the project's significant and unavoidable parking impact would remain since ROW acquisition at the US Bank property would not be altered.

The Reduced ROW Alternative would meet all of the project objectives. Similar to the proposed project, this Alternative would provide traffic improvements at the Brookhurst Street/Adams Avenue intersection consistent with the City's *Circulation Element* to alleviate the deficient forecast year 2030 without project condition (LOS F) to an acceptable LOS (LOS D) under the forecast year 2030 with project condition. This Alternative would also carry forward the City of Huntington Beach's responsibilities for the Brookhurst Street/Adams Avenue intersection under the MOU. The proposed improvements for this Alternative would incorporate a design and construction methodology that would minimize impacts to surrounding residents and businesses more so than the proposed project. Lastly, this Alternative would alleviate existing and forecast traffic congestion at the Brookhurst Street/Adams Avenue intersection and improve mobility for travelers within the City and surrounding areas.

## **7.6 "ENVIRONMENTALLY SUPERIOR" ALTERNATIVE**

As discussed in [Section 5.0](#) of this EIR, significant and unavoidable impacts related to inadequate parking supply would occur as part of the project following implementation of recommended mitigation measures. The determination of an environmentally superior alternative is based on the consideration of how the alternative fulfills the project objectives and how the alternative either reduces significant, unavoidable impacts or substantially reduces the impacts to the surrounding environment. As stated above, *CEQA Guidelines* Section 15126.6(e), "*No Project*" Alternative, indicates that "if the environmentally superior alternative is the "no project" alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives."

[Table 7-1, Comparison of Alternatives](#), provides a breakdown of the alternatives compared to the proposed project. As seen in [Table 7-1](#) and discussed above, both the No Project Alternative and the Reduced ROW Alternative have been determined to be the environmentally superior alternatives to the project.



The Reduced ROW Alternative would reduce environmental impacts in regards to air quality, GHG, noise, and hazards and hazardous materials, since the construction impact area would be slightly reduced in comparison to the project and demolition of Building E and block wall at 20011 Lawson Lane would no longer be required. This would result in decreased short-term construction impacts. However, similar traffic and circulation and land use and relevant planning impacts would result compared to the proposed project and this Alternative would not avoid the project’s significant and unavoidable parking impact, as parking space removal at the southeastern corner of the intersection (US Bank property) would remain similar to the proposed project.

**Table 7-1  
Comparison of Alternatives**

Sections	No Project	Reduced Lane Width
Land Use and Relevant Planning	∨	=*
Traffic and Circulation	△	=
Air Quality	△	∨
Greenhouse Gas Emissions	△	∨
Noise	∨	∨
Hazards and Hazardous Materials	∨	∨
△ Indicates an impact that is greater than the proposed project (environmentally inferior). ∨ Indicates an impact that is less than the proposed project (environmentally superior). = Indicates an impact that is equal to the proposed project (neither environmentally superior nor inferior). * Indicates a significant and unavoidable impact remains.		

Although the No Project Alternative would avoid the project’s significant and unavoidable parking impact, *CEQA Guidelines* Section 15126.6(e) states that “if the environmentally superior alternative is the “no project” alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.” Because the Reduced ROW Alternative would result in an overall reduction in impacts in comparison to the proposed project, it has been determined be the environmentally superior alternative, although the significant and unavoidable parking impact would not be avoided. The Reduced ROW Alternative would accomplish the project objectives. Implementation of the Reduced ROW Alternative would improve the forecast operations at the intersection such that the LOS would operate at a LOS D or better. It would accomplish the improvements to the Brookhurst Street/Adams Avenue as planned for within the City’s *Circulation Element*, and would also satisfy the City’s responsibilities as set forth in the MOU, while incorporating a design and construction methodology that minimize impacts to surrounding residents and businesses.