
CHAPTER 5 Alternatives

5.1 INTRODUCTION

The following discussion evaluates alternatives to the proposed Overlay Zone and examines the potential environmental impacts associated with each alternative. Through comparison of these alternatives to the Overlay Zone, the relative environmental advantages and disadvantages of each are weighed and analyzed. The *California Environmental Quality Act* (CEQA) Guidelines require that the range of alternatives addressed in an EIR be governed by a rule of reason. Not every conceivable alternative must be addressed, nor do infeasible alternatives need to be considered (CEQA Guidelines Section 15126.6). Section 15126.6 of the CEQA Guidelines states that the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, other plans or regulatory limitations, and jurisdictional boundaries. The discussion of alternatives must focus on alternatives capable of either avoiding or substantially lessening any significant environmental effects of the project, even if the alternative would impede, to some degree, the attainment of the project objectives or would be more costly. The alternatives discussion should not consider alternatives whose implementation is remote or speculative, and the analysis need not be presented in the same level of detail as the assessment of the project.

As identified in Section 3.3 (Project Objectives), the overall objectives of the Overlay Zone are to encourage a more active commercial and residential community, provide an expanded economic base, maximize property and sales tax revenues, and improve the jobs/housing balance within the City. Creation of this Overlay Zone will also allow the City to consider subsequent actions consistent with these updates in the General Plan and Land Use designations.

Based on the CEQA Guidelines, several factors need to be considered in determining the range of alternatives to be analyzed in an EIR and the level of analytical detail that should be provided for each alternative. These factors include (1) the nature of the significant impacts of the proposed project; (2) the ability of alternatives to avoid or lessen the significant impacts associated with the project; (3) the ability of the alternatives to meet the objectives of the project; and (4) the feasibility of the alternatives.

Thus, the alternatives examined herein represent alternatives that would substantially lessen at least some of the significant impacts associated with implementation of the proposed project, while still meeting the project objectives. As the lead agency, the City of Santa Ana will make any final determination with respect to whether to proceed with the proposed project or whether to accept or reject any of the alternatives identified in this section.

Since the CEQA Guidelines require that an EIR state why an alternative is being rejected, a preliminary rationale for rejecting an alternative is presented, below, in this section. If the City ultimately rejects an alternative, the rationale for the rejection will be presented in the findings that are required to be made before the City certifies the EIR and takes action on the project.

The alternatives may include a different type of project, modification of the proposed project, or suitable alternative project sites. However, the range of alternatives discussed in an EIR is governed by a “rule of reason” which CEQA Guidelines Section 15126.6(f) defines as:

... set[ting] 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 range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision-making.

5.2 ALTERNATIVES NOT EVALUATED IN THIS EIR

As the Overlay Zone is designed to guide the development of a particular portion of the City, an alternative site would not be appropriate as an alternative to the proposed project. Other land uses such as all residential would not achieve the objectives of the proposed project and could result in incompatibility with adjacent land uses. All-residential development would not attract a wide range of activities to maintain a dynamic atmosphere for the Overlay Zone or promote the image of a gateway to the City of Santa Ana. Therefore, these alternatives were rejected from further analysis in the EIR because they do not meet the objectives of the proposed project listed above. Finally, under the no project alternative analysis, there is no discussion of a no project alternative with a freezing of conditions (i.e., no development). Under CEQA Guidelines Section 15126.6(a), the no project alternative for a land use plan analyzes the continuation of existing land use plans into the future. Analysis of a no project /no development alternative is more appropriate for analyzing specific development projects.

5.3 ALTERNATIVES ANALYSIS

Three scenarios, representing a range of reasonable alternatives to the proposed project were selected for detailed analysis. The goal for evaluating any of these alternatives is to identify ways to avoid or lessen the significant environmental effects resulting from implementation of the proposed project, while attaining most of the project objectives. While a “No Project/No Build” scenario was considered, as the Overlay Zone horizon year is 2030, it is extremely unlikely that development would not occur in the Overlay Zone area. Alternatives selected for further analysis include the following:

- **Alternative 1—No Project/Reasonably Foreseeable Development (Continuation of Existing General Plan):** Under this alternative, development in the project area would occur under the existing General Plan and zoning designations.

Methodology for Selection of Alternative 1: This alternative evaluates the environmental effects of buildout of the Overlay Zone according to the existing General Plan and zoning, which allows the decision-makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project. Therefore, under Alternative 1, the impacts of the proposed project are compared to the impacts that would occur if the existing General Plan were implemented in the Overlay Zone area.

- **Alternative 2—Higher Intensity Commercial Project:** This alternative would permit a higher intensity of commercial development and a corresponding decrease in residential density for projects proposed within the Overlay Zone relative to the proposed overlay plan. In general, this

alternative would reduce the number of residences and increase employment opportunities as a result of more commercial/office uses in the area.

Methodology for Selection of Alternative 2: This alternative would result in approximately one-half the number of residential units within the Overlay Zone, which would reduce many of the significant impacts of the proposed project.

- **Alternative 3—Reduced Project:** This alternative would allow development at a maximum Floor Area Ratio of 1.25 for each developable parcel within the Overlay Zone without a consideration of the residential density (du/ac). The anticipated mix of commercial, office and residential land uses would be identical to the proposed project, however, a maximum FAR ratio would be established that would limit development potential. Under this alternative, there would be no differentiation between different areas (districts) of the Overlay Zone.

Methodology for Selection of Alternative 3: Because this alternative would reduce the density and height of the proposed uses in certain districts, it would reduce the overall significant impacts of the proposed project.

5.3.1 Alternative 1—No Project/Reasonably Foreseeable Development (Continuation of Existing General Plan)

■ Description

Implementation of the No Project/Reasonably Foreseeable Development Alternative would represent the continuation of the City’s existing General Plan and zoning designations to guide future growth and development within the project area. The majority of the Overlay Zone is zoned Professional. For this alternative, impacts would be analyzed under a maximum buildout scenario within the project area with the allowed land uses and development standards designated in the existing General Plan and zoning designations.

■ Impacts

Aesthetics

The types of impacts associated with the obstruction/alteration of scenic resources within a State- or locally designated scenic highway, degradation of scenic vistas, changes in visual character and quality, and increased light and glare would be roughly similar to the proposed project under this alternative (with a few minor exceptions), as the overall character of the Overlay Zone would continue to be revitalized.

Similar to the proposed project, because the Overlay Zone is neither located proximate to a State-designated highway nor within a designated view corridor associated with a State scenic highway, implementation of this alternative would have *no impact* on scenic resources within a State scenic highway view corridor.

Similar to the proposed project, this alternative could result in obstruction of views of a scenic vista and/or focal views of places of public interest (e.g., historic resources, public art, or landmarks). Views of

mountain ranges from within the Overlay Zone are generally taken from viewsheds looking down street corridors, between existing buildings, as existing buildings block or obstruct the views from other locations within and around the Overlay Zone. Similar to the proposed project, this alternative would not develop new structures within street rights-of-way. Policies outlined in the existing General Plan would still protect scenic vistas and vistas in the City, and this impact would be *less than significant*.

Development under the existing General Plan would result in changes to the visual character and quality of the Overlay Zone. Similar to the proposed project, visual conditions associated with construction activities under this alternative would be temporary visual distractions typically associated with construction activities and equipment. As such, construction-related visual impacts associated with this alternative are considered *less than significant*, and would be similar to the proposed project. Development under the existing General Plan would restrict the potential building heights of structures within the Overlay Zone beyond the proposed project which could result in lesser changes to the visual character and quality of the Overlay Zone. However, with implementation of architectural review and design guidelines contained in the General Plan, this impact would remain *less than significant*, similar to the proposed project, although slightly less.

In addition, light and glare would also be expected to increase with full buildout of the existing General Plan, as described for the proposed project. The proposed project includes mitigation measures to ensure that future project design features would be developed to ensure that lighting and glare impacts from specific development projects would remain at less-than-significant levels. Development under this alternative in accordance with the General Plan and Zoning Ordinance would not be subject to the program-level mitigation measures applicable to the proposed project. In consideration of already-substantial existing ambient lighting and glare in the Overlay Zone, adverse environmental impacts from increased light and glare associated with this alternative are anticipated to be *less than significant*, but would be greater than the proposed project due to the absence of program-level mitigation measures.

Similar to the proposed project, new sources of increased shade would likely result from new development under this alternative. Based on the land uses adjacent to the Overlay Zone, there would be potential impacts to sensitive receptors as a result of increased development. Similar to the mitigation measure for the proposed project, any development would be required to undergo a shadow impact evaluation from a programmatic perspective with implementation of such measures. Impacts would be *less than significant*, but lesser when compared to the proposed project due to greater potential building heights and densities under the proposed project.

Air Quality

Implementation of this alternative creates new sources of regional air emissions, but these sources would be managed so as not to conflict with or impair implementation of the Air Quality Management Plan (AQMP). The existing General Plan and Zoning Ordinance were considered in the preparation of the 2003 AQMP, and implementation of this alternative would be consistent with the AQMP. This impact would be *less than significant*, similar to the proposed project.

The total emissions generated by construction of individual projects, which may have overlapping schedules, would be expected to remain in exceedance of SCAQMD thresholds. Construction impacts on air quality would be expected to remain *significant and unavoidable*, similar to the proposed project.

Although total air emissions may be less than the proposed project, impacts related to operation of projects under the existing General Plan and Zoning Ordinance would be *significant and unavoidable*, similar to the proposed project.

Operation of projects under this alternative would not expose sensitive receptors to substantial localized CO concentrations. The growth envisioned under this alternative would not generate CO concentrations exceeding national and State ambient air quality standards. Similar to the proposed project, the resulting air quality impacts would be *less than significant*.

Development under the General Plan and Zoning Ordinance would not be expected to generate objectionable odors that would affect a substantial number of people. This impact would be *less than significant*, similar to the proposed project.

Biological Resources

As described in the Environmental Setting, the majority of the project area has been developed, paved, or landscaped and supports largely nonnative plant species. Suitable habitat for sensitive mammal, reptile, amphibian, or fish species does not exist within the Overlay Zone or adjacent areas, and there are no wildlife migration corridors. In addition, no threatened, endangered, or sensitive species have been reported to occur within the Overlay Zone. Impacts would be *less than significant*, similar to the proposed project.

Some migratory avian species and other raptors may use portions of the site and adjacent areas during breeding season, and are protected under the *Migratory Bird Treaty Act* (MTBA). Specific areas of concern would be those portions of the proposed project area that contain large landscaping trees or other suitable vegetation such as medium size woody vegetation that could also be used for nesting. Impacts to migratory birds would be addressed on a site-by-site basis. It is expected that mitigation measures would be applied as necessary to comply with the MBTA, and reduce impacts to a *less-than-significant* level.

Cultural Resources

Development under this alternative would result in a different mix of uses, although this would not substantially affect the level of impacts to cultural resources as identified for the proposed project. Ground-disturbing activities would continue to occur in order to accommodate new development. Consequently, the potential of encountering fossil-bearing soils and rock formations, destroying below-ground paleontological resources, affecting archaeological sites and sites of cultural significance to Native Americans would still occur, similar to the proposed project. Given the lack of any documented buried cultural resources in the area, the probability of uncovering these resources is considered low. Mitigation measures would be expected to be developed on a site-by-site basis as individual projects are proposed

and reviewed. Therefore, it is anticipated that impacts under this alternative would be *less than significant*.

Because development could still occur within the project area, regardless of its intensity or type, the potential demolition or alteration of historic structures could still occur. Under current City procedures, intensive-level survey would still be required and mitigation measures implemented to protect historic resources. Therefore, it is anticipated that impacts under this alternative would be *less than significant*.

Geology and Soils

Greater development intensity would occur under this alternative; however, a substantially similar number of people would be exposed to seismic and geologic hazards. Site-specific hazards associated with erosion, loss of topsoil, liquefaction, subsidence, landslides, and expansive soils would be of a similar magnitude than the proposed project. All future development in the project area would be required to adhere to the most recent California Building Codes (CBC), which includes strict building specifications to ensure structural and foundational stability, similar to the proposed project. Overall, this alternative would have a *less-than-significant* impact, substantially similar to the proposed project.

Hazards

Impacts related to Hazards and Hazardous Materials would be largely similar to the proposed project, as the intensity of development would not substantially affect the potential for impacts to this resource. Similar to the proposed project, there is potential for encountering soil contamination during construction, which could create a significant hazard to the public or the environment. As projects are reviewed on a site-by-site basis, it is expected that mitigation measures would be identified to reduce this impact to a *less-than-significant* level.

Similar to the proposed project, all development would comply with health and safety and environmental protection laws and regulations, related to new construction and hazardous materials storage, use, and transport. This would minimize the public's exposure to contaminated and hazardous substances due to routine use and if a spill occurs. Further, compliance with applicable regulations would ensure that impacts from hazardous materials handling adjacent to nearby schools would be less than significant. These impacts would be *less than significant*.

Impacts to emergency access would be similar to the proposed project, as construction activities could temporarily encroach onto roadways. As projects are reviewed on a site-by-site basis, it is expected that mitigation measures would be identified to reduce this impact to a *less-than-significant* level.

Hydrology and Water Quality

Implementation of this alternative would not result in significant impacts to hydrology or water quality. Less development would occur, thereby reducing hydrology and water quality impacts. Although the total amount of development could differ from the proposed project under this alternative, similar alterations to drainage patterns, discharge of pollutants and alterations to hydrological patterns would

occur. Runoff would be subject to NPDES permit standards. If necessary, treatment would be employed by individual projects to remove excess pollutants from runoff during the construction and operational phases of development. In terms of water quality, this alternative would have a *less-than-significant* impact.

As the Overlay Zone area does not include any significant recharge areas, depletion of groundwater and percolation of pollutants into groundwater aquifers would be *less than significant*, similar to the proposed project.

This alternative would alter individual site drainage characteristics, but it would not increase the quantity of runoff discharged into the City storm drain system, similar to the proposed project. These impacts would be *less than significant*.

This alternative would have *less-than-significant* impacts resulting from exposure to flooding as a result of a levee or dam, or effects of seiche, tsunami, or mudflow, similar to the proposed project.

Land Use

Existing land uses within the Overlay Zone are primarily characterized as office with pockets of commercial uses. Development under this alternative would continue this trend, with more development of office and commercial uses than the proposed project. Inconsistencies between this alternative and the existing applicable land use plans governing development of the proposed project area would not occur, and would not require amendments to the General Plan and Zoning Code, which the proposed project would. Implementation of this alternative would not alter the types or densities of the uses within the Overlay Zone area. Integrated and cohesive development standards for the Overlay Zone would not be implemented as proposed under the Overlay Zone. On the whole, impacts would be *less than significant* under this alternative, and slightly less than the proposed project.

Noise

Development under this alternative could expose sensitive receptors in the project area to excessive noise levels, though less so due to a reduction in residential development. Consequently, the noise impacts to residential land uses would be less than the proposed project, but would remain *significant and unavoidable*, similar to the proposed project.

Similar to the proposed project, construction activities under this alternative would be subject to the City's Municipal Code standards, and construction noise, including vibration, would be controlled. This impact would be *less than significant*.

Population and Housing

Development proposed under this alternative would make maximum use of existing infrastructure, and future development would be required to include provisions to make any necessary improvements and to fund their fair share allocation of those costs. Thus, the indirect population growth impact resulting from

infrastructure improvements associated with this alternative is considered *less than significant*, similar to the proposed project.

Reduced development potential and no residential uses under this alternative would result in no direct population increase at buildout versus conditions under the proposed project. As a result, *no impact* would occur.

This alternative would result in indirect population growth associated with employment from new office uses. This would result in pressures on transitional areas zoned to redevelop to the maximum zoned capacity to provide more housing near jobs, to meet regional forecasts, and generally responding to employees desiring to live closer to existing job centers to reduce their commute. Therefore, this alternative could potentially exacerbate a future housing shortage issue in the City, and the impact would be slightly greater than under the proposed project for indirect population growth.

Public Services

Development under this alternative would result in less of an increase in new residents to the City at buildout when compared to the proposed project due to the lack of a direct population increase within the Overlay Zone. The firefighter to population service ratio would be substantially similar to the proposed project, as fire protection needs would be required for commercial/office uses. The same holds true for police protection, as the police officer to population service ratio would be substantially similar to what is currently projected under the proposed project. As a result, impacts to fire and police services would be *less than significant*.

Impacts to libraries and schools would be less than the proposed project due to the absence of residential uses under this alternative. No impact would occur.

Under this alternative, no direct population increase is anticipated. As a result, the overall amount of land designated for parks and recreation under this alternative would be substantially less than the proposed project. As Alternative 1 would not result in the need for additional parkland, *no impact* would occur, and impacts would be substantially less than the proposed project.

Transportation

As development under this alternative would involve an intensification of uses, traffic volumes along local street segments are anticipated to increase. The impacts to intersections would remain *potentially significant*, although less so than under the proposed project. As buildout of both the proposed project and this alternative would both be subject to City code in regards to parking, impacts to parking would be similar to the proposed project and *less than significant*. Impacts to emergency access would comply with existing policies contained in the General Plan and Municipal Code, and would be *less than significant*, similar to the proposed project.

Utilities

Development under the No Project/Reasonably Foreseeable Alternative would not include residential uses compared to the proposed project. The demand for utilities may increase as land uses within the project area increase in intensity however any increase would be substantially less than the proposed project. As the increase in demand would be less than under the proposed project, impacts would be *less than significant*.

5.3.2 Alternative 2—Higher Intensity Commercial Project

■ Description

The Higher Intensity Commercial Alternative involves permitting a higher intensity of commercial development and a corresponding decrease in residential density for projects proposed within the Overlay Zone relative to the proposed project. In general, this alternative would reduce the number of residences and increase employment opportunities as a result of more commercial/office uses in the area. For example, if, under the proposed project, 2,000 square feet (sf) of residential, 1,000 sf of office, and 1,000 sf of commercial space would be constructed, 1,000 sf of residential, 1,000 sf of office, and 2,000 sf of commercial space would be constructed under this alternative. Specific development characteristics that would be allowed under this alternative relative to the proposed Specific Plan are specified in Table 5-1 (Alternative 2 and Proposed Overlay Zone Characteristics).

	<i>Gross Potential Residential Units</i>	<i>Net Potential Residential Units</i>	<i>Gross Potential Office</i>	<i>Net Potential Office</i>	<i>Gross Potential Retail</i>	<i>Net Potential Retail</i>
Alternative 2	2,707	2,707	3,410,507 sf	690,339 sf	4,684,700 sf	4,372,414 sf
Proposed Overlay Zone	5,551	5,551	3,410,507 sf	690,339 sf	1,275,440 sf	963,286 sf

SOURCE: PBS&J 2006
sf = square feet

■ Impacts

Aesthetics

The types of impacts associated with obstruction/alteration of scenic resources within a State- or locally designated scenic highway, degradation of scenic vistas, changes in visual character and quality, and increased light and glare would be roughly similar to the proposed project under this alternative (with a few minor exceptions), as the overall character of the project area at buildout would be similar. Similar changes could occur throughout the project area, and development would be subject to the same policies, standards, and guidelines as presented in the proposed project.

Similar to the proposed project, because the Overlay Zone is neither located proximate to a State-designated highway, nor within a designated view corridor associated with a State scenic highway,

implementation of this alternative would have *no impact* on scenic resources within a State scenic highway view corridor.

Similar to the proposed project, this alternative could result in obstruction of views of a scenic vista and/or focal views of places of public interest (e.g., historic resources, public art, or landmarks). Views of mountain ranges from within the Overlay Zone are generally taken from viewsheds looking down street corridors, between existing buildings. Similar to the proposed project, this alternative would not develop new structures within street rights-of-ways so existing viewsheds would not be blocked and views of the mountains from within the Overlay Zone would be preserved. Since development under this alternative would be likely be similar in height to those structures under the proposed project, the impacts upon scenic vistas of mountains from this alternative would also be similar to the proposed project and are considered *less than significant*.

Development under this alternative would result in changes to the visual character and quality of the Overlay Zone. Similar to the proposed project, temporary adversely alter visual conditions associated with construction activities under this alternative would be temporary visual distractions typically associated with construction activities and equipment. As such, construction-related visual impacts associated with this alternative are considered *less than significant*, and would be equal to the proposed project.

This alternative would result in permanent impacts to the visual character or quality of the Overlay Zone. With implementation of design guidelines, including landscaped areas and masonry buffers, the new development proposed under this alternative would generally improve the visual character of the Overlay Zone and surrounding areas. The visual quality impacts of this alternative would be considered *less than significant*, similar to the proposed project.

Light and glare would also be expected to increase with implementation of this alternative, similar to the proposed project. This alternative includes the same mitigation measures applicable to the proposed project to ensure that future project design features would be developed to ensure that lighting and glare impacts from specific development projects would remain at less than significant levels. In consideration of already-substantial existing ambient lighting and glare in the Overlay Zone, adverse environmental impacts from increased light and glare associated with this alternative are anticipated to be *less than significant*.

The provision of appropriate mitigation measures and specific project design features would ensure that lighting and glare impacts from specific development projects under this alternative would remain at *less-than-significant* levels.

Similar to the proposed project, new sources of increased shade would likely result from new development under this alternative, although slightly less than under the proposed project because building heights in identified districts would be lower. Any development under this alternative would require site-specific shade/shadow analysis, similar to the proposed project. As a result, it is anticipated that impacts under this alternative would also be *less than significant*.

Air Quality

Implementation of this alternative would not provide new sources of regional air emissions that would conflict with, and impair, implementation of the Air Quality Management Plan (AQMP). Implementation of Alternative 2 would result in less residential development than the proposed project. Because future population levels would still be consistent with SCAG projections, this alternative would also be considered consistent with the 2003 AQMP. Similar to the proposed project, this impact would be considered *less than significant*, similar to the proposed project.

The total amount of emissions generated, including criteria pollutants, under this alternative would be similar to that of the proposed project, as this alternative would result in a similar amount of construction. The total emissions generated by construction of individual projects, which may have overlapping schedules would be expected to remain in exceedance of SCAQMD thresholds. Construction impacts on air quality would remain *significant and unavoidable*, and would be similar in magnitude to the proposed project.

Similar to the proposed project, operation of projects under this alternative would remain *significant and unavoidable*.

In addition, development under this alternative would not be expected to generate objectionable odors that would affect a substantial number of people. This impact would be *less than significant*.

Biological Resources

As described in the Environmental Setting, the majority of the project area has been developed, paved, or landscaped and supports largely non-native plant species. Suitable habitat for sensitive mammal, reptile, amphibian, or fish species does not exist within the Overlay Zone or adjacent areas, and there are no wildlife migration corridors. In addition, no threatened, endangered, or sensitive species have been reported to occur within the Overlay Zone area. Impacts would be *less than significant*, similar to the proposed project.

Some migratory avian species and other raptors may use portions of the site and adjacent areas during breeding season, and are protected under the Migratory Bird Treaty Act (MTBA). Specific areas of concern would be those portions of the proposed project area that contain large landscaping trees or other suitable vegetation that could also be used for nesting. Impacts to migratory birds would be addressed through project-specific mitigation measures and compliance with the MBTA, similar to the proposed project, and impacts would be reduced to *less-than-significant* levels.

Cultural Resources

Development under this alternative would result in different building densities and building heights, although this difference would not substantially affect the level of impacts to cultural resources. Ground-disturbing activities could continue to occur in order to accommodate new development. Consequently, the potential of encountering fossil-bearing soils and rock formations, destroying below-ground

paleontological resources, affecting archaeological sites and sites of cultural significance to Native Americans would still occur, similar to the proposed project. Given the lack of any documented buried cultural resources in the area, the probability of uncovering these resources is considered low. Mitigation measures identified for the proposed project would apply and would reduce impacts to *less than significant*.

Because development could still occur on the same parcels within the Overlay Zone, regardless of its intensity, the potential demolition of historic structures could still occur. Even though the mitigation measures associated with protection of historic resources for the proposed project would apply, it is anticipated that impacts under this alternative would be *less than significant*.

Geology and Soils

Similar to the proposed project, existing regulations that address groundshaking and ground failure issues (such as liquefaction), and adherence to the requirements of the Building and Safety Code would reduce impacts associated with seismically induced groundshaking and ground failure to a *less-than-significant* level.

Adherence to the soil and foundation support parameters and the grading requirements in the Building and Safety Code, which is required by City and State law, would also ensure the maximum practicable protection available from soil failures (i.e., lateral spreading, subsidence, liquefaction, collapse, and expansive soils) under static or dynamic conditions. Similar to the proposed project, these impacts would be *less than significant*.

Compliance with the NPDES permit process, the Building and Safety Code requirements and additional City requirements would minimize potential effects from erosion. Consequently, similar to the proposed project, the potential impact associated with topsoil erosion would be *less than significant*.

Hazards

Impacts related to Hazards and Hazardous Materials would be largely similar to the proposed project, as the intensity of development would not substantially affect the potential for impacts to this resource. Similar to the proposed project, there is potential for encountering soil contamination during construction, which could create a significant hazard to the public or the environment. Mitigation measures identified for the proposed project would reduce this impact to a *less-than-significant* level.

Construction and operational activities under this alternative could involve the routine use, storage, transport, or disposal of hazardous materials in an identical fashion as the proposed project. This would include materials typically used in construction (e.g., diesel fuel, paints and solvents), cleaning products used in maintenance of commercial and residential space, auto repair and medical facility products, and fertilizers and pesticides used in maintenance of landscaped areas. Compliance with applicable federal, State and local regulations related to the use, storage and transport of such materials would ensure that this impact would be *less than significant*, similar to the proposed project.

Similar to the proposed project, under this alternative, the City would be required to create an updated emergency response plan for the project area to ensure adequate emergency access and evacuation. Site plans for future development within the Overlay Zone would be reviewed by the Santa Ana Fire Department as well as the City of Santa Ana Planning Department to ensure adequate police, ambulance, and fire personnel access to the proposed project area. In addition, future developments would likely require further environmental analysis under CEQA which would include impact analysis of fire, police, and ambulance access. Traffic impacts within the Overlay Zone which could impact response plans and evacuation plans would be required to be mitigated to less than significant levels. After implementation of identified mitigation measures for the proposed project, development initiated under this alternative would not interfere with any emergency response or evacuation plans. This impact is considered *less than significant*, similar to the proposed project.

Although projects at the parcels within the Overlay Zone area listed in Alternative 2 would involve the use of some hazardous materials within the Overlay Zone, applicable laws regarding upset and accident preparation and response would continue to be implemented as required in the proposed project. Existing regulations would be expected to minimize the potential for exposure to adverse health or safety effects. Therefore, development under this alternative would not involve the use of materials in a manner that poses any substantial hazards to people, or to animal or plant populations. Furthermore, the City Fire Department would continue to provide emergency response services. As mentioned above, this alternative would not interfere with emergency response plans or emergency evacuation plans relating to hazardous materials because each of the future projects within the Overlay Zone would be required to go through plan checks with the fire department in addition to further environmental review of fire and emergency services. The types of hazardous materials anticipated are expected to be limited to regulated types and quantities. For these reasons, Alternative 2 would result in a *less-than-significant* impact related to the upset and accidental release of hazardous materials into the environment, similar to the proposed project.

Similar to the proposed project, the future developments under Alternative 2 could handle and/or store potentially hazardous materials within the Overlay Zone; however, the types of hazardous materials anticipated are limited to regulated types and quantities. Compliance with all applicable local, State, and federal laws, and regulations associated with hazards and hazardous materials would ensure that development under this alternative would result in a *less-than-significant* environmental impact related to the emission or handling of hazardous materials within the vicinity of schools, similar to the proposed project.

Hydrology and Water Quality

Implementation of Alternative 2 would not result in significant impacts to hydrology or water quality. Grading and other earth moving activities during construction of individual projects within the project area could lead to an increase in suspended solids from surface flows during storm events, which could also impact surface water quality during storm events; however, any proposed development within the Overlay Zone under this alternative would have to satisfy all applicable requirements of the NPDES Program and the Santa Ana Municipal Code, including the preparation of a SWPPP, similar to the

proposed project. Compliance with these requirements would ensure that all construction related impacts to water quality and waste discharge requirements would be *less than significant*.

During operational activities, pollutants may also be washed from the streets during non-storm events and this effect has the potential to degrade water quality and may result in significant impacts; however, development projects have a responsibility under NPDES to ensure pollutant loads from the projects do not exceed total maximum daily loads for downstream receiving waters. Under this alternative, development projects within the Overlay Zone would be required to submit and then implement a SUSMP containing design features BMPs appropriate and applicable to the individual projects. Potential water quality impacts would be *less than significant* with the preparation of required SUSMPs and implementation of the applicable BMPs, similar to the proposed project.

Groundwater use as a result of implementation of this alternative would be in accordance to existing plans and projections and would not substantially deplete groundwater supplies. In addition, the project area is currently not used for groundwater recharge activities and the site is developed with primarily impervious surfaces. Under existing conditions, there is little, if any, potential for natural groundwater recharge to occur, and there is no facilitated groundwater recharge. Under this alternative, impervious surface characteristics would not be greatly altered, and no facilitated groundwater recharge facilities are planned. Existing areas of pervious surfaces that are not being modified would remain and potential recharge would not be changed. Improvement of existing impervious areas to more pervious conditions would not greatly alter surface hydrology and would not significantly alter infiltration or groundwater recharge. Consequently, development under this alternative would result in *less-than-significant* impact to groundwater supplies or recharge, similar to the proposed project.

The project area is developed and served by existing storm water collection and conveyance systems, and does not contain a stream or river. Although slightly less residential and office development would occur under this alternative, construction activities associated with development would not require any substantial changes to the existing drainage patterns of the area. Furthermore, individual projects developed under this alternative would include project design features that would aid in the conveyance of storm water to existing facilities. All runoff would continue to be conveyed via streets and gutters to storm drain locations within the project area. The identified project requirement for the proposed project would still apply and would ensure that impacts associated with drainage regarding erosion or flooding would remain *less than significant*, similar to the proposed project.

The project area is an urbanized environment with no natural drainage and mostly impervious surfaces. Urban contaminants in runoff from the proposed project area could lower the quality of stormwater runoff both during and after construction. Sediment-laden runoff from construction and post-construction operations at the site could enter the City's storm drain system, and contribute to degradation water quality; however, any potentially significant impacts on water quality during construction and post-construction phases would be reduced to *less-than-significant* levels through compliance with the identified PRs, and existing SUSMPs and implementation of the applicable BMPs. Because slightly less construction would occur under this alternative, this impact would be slightly less than the proposed project.

Similar to the proposed project, implementation of this alternative, which would result in slightly less residential and office development, would not otherwise substantially degrade water quality, place housing or structures within a 100-year flood zone, or expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam. There would be *no impact* with respect to these thresholds. In addition, there would be *no impact* that would expose people or structures under this alternative to a significant risk of loss, injury, or death involving inundation by a seiche, tsunami, or mudflow.

Land Use

Existing land uses within the project area are primarily characterized as office with pockets of commercial uses. Development under this alternative would include a higher level of commercial uses within a mixed use community compared to the proposed project, and fewer total residential units would be constructed overall. Amendments to the General Plan and Zoning Code would be undertaken to ensure conformity with the development proposed under this alternative. Similar to the proposed project, the intention of this alternative is to provide a mixed use community, which would enhance the efficiency and daily activity within the project area (although slightly less residential would be allowed.) Overall changes to the land use character would be similar to that described for the proposed project, but would result in slightly different densities and mix of uses. On the whole, impacts would be *less than significant* under this alternative, and similar to the proposed project.

Noise

Under Alternative 2, future development could expose sensitive receptors in the project area to excessive noise levels because residential uses would be developed adjacent to other non-residential uses. Consequently, the noise impacts to residential land uses along major thoroughfares would be similar to the proposed project, and would remain *significant and unavoidable*.

Similar to the proposed project, construction activities under this alternative would be subject to the City's Municipal Code standards, and unreasonably loud construction noise would be controlled. This impact would be *less than significant*, similar to the proposed project.

Population and Housing

The proposed infill development under this alternative would make maximum use of existing infrastructure, and future development would be required to include provisions to make any necessary improvements and to fund their fair share allocation of those costs. Thus, the indirect population growth impact resulting from infrastructure improvements associated with this alternative are considered *less than significant*, similar to the proposed project.

Full buildout of Alternative 2 would result in lesser impacts to population and housing as compared to the proposed project. The reduction in residential units (2,844) would also reduce the anticipated direct population growth to approximately 5,688 residents. Because the projected increase of the anticipated residents in the City resulting from the proposed project is within, or under the limit of, the total

population increase projected for the City between 2005 and 2030, and because this alternative would result in fewer new residents, the forecasted population growth in the City is not considered substantial relative to the surrounding areas. Therefore, this impact would be slightly less in magnitude when compared to the proposed project. Therefore, the anticipated increase as a result of future development in the project area would likely remain *less than significant*, although less than the proposed project.

The beneficial impact of providing a net increase residential housing units would be realized under Alternative 2, but to a lesser degree than the proposed project. Due to the fact that Alternative 2 would provide 2,844 fewer residential units than the proposed project, this alternative would not perform as well as the proposed project in addressing a potential future housing shortage issue in the City.

Public Services

As the population increase would be slightly less under this alternative compared to the proposed project, impacts to public services would also be less than the proposed project, as discussed below.

The same types of development would be permitted throughout the project area and approximately half of the residential development of the proposed project could occur under this alternative. Therefore, the anticipated number of calls is expected to be similar to the proposed project, and would not be above the recommended workload for a rescue ambulance. Similarly, all new buildings developed under this alternative would be constructed in accordance with the City's Building Code and would be required to have adequate fire code requirements. Implementation of this alternative would still not result in a substantial reduction in the firefighter per resident ratio within the City, similar to the proposed project. As such, impacts would also be *less than significant*.

All new development places an increased burden on police services and causes a need for increased staff and increased space. Security concerns related to new uses within the project area would be addressed through the permit process, at which time the Santa Ana Police Department would have the opportunity to review the proposed uses and provide input on necessary security measures. Persons on-site or elsewhere in the City would not be exposed to increased risks as a result of the additional demands on the Santa Ana Police Department as a result of development under this alternative. Further, the present police officer to population service ratio would be similar to the proposed project, and impacts would be *less than significant*.

Slightly fewer residential units would be developed under this alternative, which in turn, would result in slightly fewer students when compared to the proposed project. The Tustin Unified School District currently collects developer fees for mitigation of school impacts. Government Code Section 53080, payment of development fees is considered full mitigation for significant school impacts. Therefore, the impact on schools from this alternative would be *less than significant*, similar to the proposed project, although slightly less.

As slightly fewer residential units would be developed under this alternative, the impact to library services would be less than the proposed project. However, an increase in 5,414 residents would increase demand on library services and would be considered potentially significant. Implementation of mitigation, such as

mitigation measure MM-OZ 4.11-4, would ensure that the appropriate level of library facilities are provided and that impacts would remain *less than significant*, similar to the proposed project.

Similarly, implementation of Alternative 2 would result in a lesser potential demand for additional recreational facilities in the project area, nonetheless it could result in the increased use of parks and recreational facilities. Payment of developer fees, such as those discussed under mitigation measure MM-OZ 4.11-5, would ensure that adequate parkland is provided for all City residents per the City's Municipal Code. As such, impacts would be *less than significant*, similar to the proposed project, although the anticipated level of parkland required for implementation of this alternative would be less than the proposed project.

Transportation

As development under this alternative would involve an intensification of uses, traffic volumes along local street segments are anticipated to increase. The impacts to intersections would remain *potentially significant*, although less so than under the proposed project. As buildout of both the proposed project and this alternative would both be subject to City code in regards to parking, impacts to parking would be similar to the proposed project and *less than significant*. Impacts to emergency access would comply with existing policies contained in the General Plan and Municipal Code, and would be *less than significant*, similar to the proposed project.

Utilities

Alternative 2, at buildout, would increase the population of the City resulting in increased demands for utilities. As the population increase would be less than under the proposed project, demands on utilities would be correspondingly less, although only slight so compared to the proposed project, and impacts would be *less than significant*.

5.3.3 Alternative 3—Reduced Project

■ Description

This alternative would allow development at a maximum Floor Area Ratio of 1.25 for each developable parcel within the Overlay Zone. The anticipated mix of commercial, office and residential land uses would be identical to the proposed project, however the potential on-site densities would be reduced to less than half that of the currently proposed Active Urban district. Under this alternative, there would be no differentiation between different areas (districts) of the Overlay Zone. Specific development characteristics that would be allowed under this alternative relative to the proposed Overlay Zone are specified in Table 5-2 (Alternative 3 and Proposed Overlay Zone Characteristics).

Table 5-2 Alternative 3 and Proposed Overlay Zone Characteristics

	<i>Gross Potential Residential Units</i>	<i>Net Potential Residential Units</i>	<i>Gross Potential Office</i>	<i>Net Potential Office</i>	<i>Gross Potential Retail</i>	<i>Net Potential Retail</i>
Alternative 2	2,965	2,965	2,387,361 sf	-332,807 sf	819,326 sf	507,172 sf
Proposed Overlay Zone	5,551	5,551	3,410,507 sf	690,339 sf	1,275,440 sf	963,286 sf

SOURCE: PBS&J 2006

sf = square feet

■ Impacts

Aesthetics

The types of impacts associated with obstruction/alteration of scenic resources within a State- or locally designated scenic highway, degradation of scenic vistas, changes in visual character and quality, and increased light and glare would be roughly similar to the proposed project under this alternative (with a few minor exceptions), as the overall character of the project area at buildout would be similar. Similar changes could occur throughout the project area, and development would be subject to the same policies, standards, and guidelines as presented in the proposed project.

Similar to the proposed project, because the downtown area is neither located proximate to a State-designated highway, nor within a designated view corridor associated with a State scenic highway, implementation of this alternative would have *no impact* on scenic resources within a State scenic highway view corridor.

Similar to the proposed project, this alternative could result in obstruction of views of a scenic vista and/or focal views of places of public interest (e.g., historic resources, public art, or landmarks). Views of mountain ranges from within the downtown area are generally taken from viewsheds looking down street corridors, between existing buildings. Similar to the proposed project, this alternative would not develop new structures within street rights-of-way so existing viewsheds would not be blocked and views of the mountains from within the Overlay Zone would be preserved. Since development under this alternative would be less intense and lower in proposed height than the structures under the proposed project, the impacts upon scenic vistas of mountains from this alternative would be less than the proposed project and are considered *less than significant*.

Development under this alternative would result in changes to the visual character and quality of the downtown area. Similar to the proposed project, temporary adversely alter visual conditions associated with construction activities under this alternative would be temporary visual distractions typically associated with construction activities and equipment. As such, construction-related visual impacts associated with this alternative are considered *less than significant*, and would be equal to the proposed project.

This alternative would result in permanent impacts to the visual character or quality of the downtown area. However, the development proposed under this alternative would be significantly reduced in overall

density and height, resulting in substantially lower building height overall, as compared to the proposed project. The same design guidelines and new landscaping applicable to the proposed project would be applied to this alternative. A change of one or two stories that currently exist in the identified districts to a maximum of five stories would not represent a substantial increase in building height and massing, and, therefore, would not represent an adverse change to the visual quality and character of the area. Therefore, this impact would be considered *less than significant*, and significantly less than the proposed project.

Light and glare would also be expected to increase with implementation of this alternative, similar to the proposed project. This alternative includes the same mitigation measures applicable to the proposed project to ensure that future project design features would be developed to ensure that lighting and glare impacts from specific development projects would remain at less than significant levels. In consideration of already-substantial existing ambient lighting and glare in the Overlay Zone area, adverse environmental impacts from increased light and glare associated with this alternative are anticipated to be less than significant. The provision of appropriate mitigation measures and specific project design features would ensure that lighting and glare impacts from specific development projects under this alternative would remain at *less-than-significant levels*.

Similar to the proposed project, new sources of increased shade would likely result from new development under this alternative. From a programmatic perspective, evaluation of shade/shadow impacts of development projects on a project by project basis would reduce this impact to *less than significant*, and equal to the proposed project.

Air Quality

Implementation of this alternative would not provide new sources of regional air emissions that would conflict with, and impair, implementation of the Air Quality Management Plan (AQMP). Implementation of Alternative 3 would result in less residential and office development than the proposed project. Because future population levels would still be consistent with SCAG projections, this alternative would also be considered consistent with the 2003 AQMP. Similar to the proposed project, this impact would be considered *less than significant*.

The total amount of emissions generated, including criteria pollutants, under this alternative could result in a slightly lesser amount of construction than the proposed project, due to the reduced amount of residential and office development; however, the total emissions generated by construction of individual projects, which may have overlapping schedules would be expected to remain in exceedance of SCAQMD thresholds. As a result, construction impacts on air quality would remain *significant and unavoidable*, although they would be less in magnitude compared to the proposed project.

Although total air emissions may be less than the proposed project, operation of projects under this alternative would likely remain *significant and unavoidable* due to the increase in development within the Overlay Zone.

Development under this alternative would not be expected to generate objectionable odors that would affect a substantial number of people. This impact would be *less than significant*, similar to the proposed project.

Biological Resources

As described in the Environmental Setting, the majority of the Overlay Zone area has been developed, paved, or landscaped and supports largely non-native plant species. Suitable habitat for sensitive mammal, reptile, amphibian, or fish species does not exist within the Overlay Zone or adjacent areas, and there are no wildlife migration corridors. In addition, no threatened, endangered, or sensitive species have been reported to occur within the Overlay Zone area. Impacts would *less than significant*, similar to the proposed project.

Some migratory avian species and other raptors may use portions of the site and adjacent areas during breeding season, and are protected under the MBTA. Specific areas of concern would be those portions of the proposed project area that contain large landscaping trees or other suitable vegetation that could also be used for nesting. Impacts to migratory birds would be addressed through mitigation measures and compliance with the MBTA, similar to the proposed project, and impacts would be reduced to *less-than-significant* levels.

Cultural Resources

Development under this alternative would result in different building densities and building heights, although this would not substantially affect the level of impacts to cultural resources. Ground-disturbing activities could continue to occur in order to accommodate new development. Consequently, the potential of encountering fossil-bearing soils and rock formations, destroying below-ground paleontological resources, affecting archaeological sites and sites of cultural significance to Native Americans would still occur, similar to the proposed project. Given the lack of any documented buried cultural resources in the area, the probability of uncovering these resources is considered low. Mitigation measures identified for the proposed project would apply and would reduce impacts to *less than significant*.

Because development could still occur on the same parcels within the Overlay Zone, regardless of its intensity, the potential demolition of historic structures could still occur. The mitigation measures associated with protection of historic resources for the proposed project would apply, and as a result, it is anticipated that impacts under this alternative would be *less than significant*.

Geology and Soils

Similar to the proposed project, existing regulations that address groundshaking and ground failure issues (such as liquefaction), and adherence to the requirements of the City's Building and Safety Code would reduce impacts associated with seismically induced groundshaking and ground failure to a *less-than-significant* level.

Adherence to the soil and foundation support parameters and the grading requirements in the City's Building and Safety Code, which is required by City and State law, would also ensure the maximum practicable protection available from soil failures (i.e., lateral spreading, subsidence, liquefaction, collapse, and expansive soils) under static or dynamic conditions. Similar to the proposed project, these impacts would be *less than significant*.

Compliance with the NPDES permit process, the Building and Safety Code requirements and additional City requirements would minimize potential effects from erosion. Consequently, similar to the proposed project, the potential impact associated with topsoil erosion would be *less than significant*.

Hazards

Impacts related to Hazards and Hazardous Materials would be largely similar to the proposed project, as the intensity of development would not substantially affect the potential for impacts to this resource. Similar to the proposed project, there is potential for encountering soil contamination during construction, which could create a significant hazard to the public or the environment. Mitigation Measures identified for the proposed project would reduce this impact to a *less-than-significant* level.

Construction and operational activities under this alternative could involve the routine use, storage, transport, or disposal of hazardous materials in an identical fashion as the proposed project. This would include materials typically used in construction (e.g., diesel fuel, paints and solvents), cleaning products used in maintenance of commercial and residential space, auto repair and medical facility products, and fertilizers and pesticides used in maintenance of landscaped areas. Compliance with applicable federal, State and local regulations related to the use, storage and transport of such materials would ensure that this impact would be *less than significant*, similar to the proposed project.

Similar to the proposed project, under this alternative, the City would be required to create an updated emergency response plan for the project area to ensure adequate emergency access and evacuation. Site plans for future development within the Overlay Zone area would be reviewed by the City to ensure adequate police, ambulance, and fire personnel access to the proposed project area. In addition, future developments would likely require further environmental analysis under CEQA which would include impact analysis of fire, police, and ambulance access. Traffic impacts within the Overlay Zone area which could impact response plans and evacuation plans would be required to be mitigated to less than significant levels. After implementation of identified mitigation measures for the proposed project, development initiated under this alternative would not interfere with any emergency response or evacuation plans. This impact is considered *less than significant*, similar to the proposed project.

Although projects at the identified parcels within the Overlay Zone could involve the use of some hazardous materials, applicable laws regarding upset and accident preparation and response would continue to be implemented as required for the proposed project. Existing regulations would be expected to minimize the potential for exposure to adverse health or safety effects. Therefore, development under this alternative would not involve the use of materials in a manner that poses any substantial hazards to people, or to animal or plant populations. Furthermore, the City Fire Department would continue to provide emergency response services. As mentioned above, this alternative would not interfere with

emergency response plans or emergency evacuation plans relating to hazardous materials because each of the future projects within the Overlay Zone would be required to go through plan checks with the fire department in addition to further environmental review of fire and emergency services. The types of hazardous materials anticipated are expected to be limited to regulated types and quantities. For these reasons, Alternative 3 would result in a *less-than-significant* impact related to the upset and accidental release of hazardous materials into the environment, similar to the proposed project.

Hydrology and Water Quality

Implementation of Alternative 3 would not result in significant impacts to hydrology or water quality. Less overall development could occur, thereby slightly reducing hydrology and water quality impacts. Grading and other earth moving activities during construction of individual projects within the project area could lead to an increase in suspended solids from surface flows during storm events, which could also impact surface water quality during storm events; however, any proposed development within the Overlay Zone area under this alternative would have to satisfy all applicable requirements of the NPDES Program and the Santa Ana Municipal Code, including the preparation of a SWPPP, similar to the proposed project. Compliance with these requirements would ensure that all construction related impacts to water quality and waste discharge requirements would be *less than significant*.

During operational activities, pollutants may also be washed from the streets during non-storm events and this effect has the potential to degrade water quality and may result in significant impacts; however, development projects have a responsibility under the NPDES, to ensure pollutant loads from the projects do not exceed total maximum daily loads for downstream receiving waters. Under this alternative, development projects within the Overlay Zone area would be required to submit and then implement a SUSMP containing design features BMPs appropriate and applicable to the individual projects. Potential water quality impacts would be *less than significant* with the preparation of required SUSMPs and implementation of the applicable BMPs, similar to the proposed project.

Groundwater use as a result of implementation of this alternative would be in accordance to existing plans and projections and would not substantially deplete groundwater supplies. In addition, the project area is currently not used for groundwater recharge activities and the site is developed with primarily impervious surfaces. Under existing conditions, there is little, if any, potential for natural groundwater recharge to occur, and there is no facilitated groundwater recharge. Under this alternative, impervious surface characteristics would not be greatly altered, and no facilitated groundwater recharge facilities are planned. Existing areas of pervious surfaces that are not being modified would remain and potential recharge would not be changed. Improvement of existing impervious areas to more pervious conditions would not greatly alter surface hydrology and would not significantly alter infiltration or groundwater recharge. Consequently, development under this alternative would result in a *less-than-significant* impact to groundwater supplies or recharge, similar to the proposed project.

The project area is developed and served by existing storm water collection and conveyance systems, and does not contain a stream or river. Although slightly less residential and office development would occur under this alternative, construction activities associated with development would not require any substantial changes to the existing drainage patterns of the area. Furthermore, individual projects

developed under this alternative would include project design features that would aid in the conveyance of storm water to existing facilities. All runoff would continue to be conveyed via streets and gutters to storm drain locations within the project area. The identified project requirement for the proposed project would still apply and would ensure that impacts associated with drainage regarding erosion or flooding would remain *less than significant*, similar to the proposed project.

The project area is an urbanized environment with no natural drainage and mostly impervious surfaces. Urban contaminants in runoff from the proposed project area could lower the quality of stormwater runoff both during and after construction. Sediment-laden runoff from construction and post-construction operations at the site could enter the City's storm drain system, and contribute to degradation water quality. However, any potentially significant impacts on water quality during construction and post-construction phases would be reduced to *less-than-significant* levels through compliance with the identified PRs, and existing SUSMPs and implementation of the applicable BMPs. Because slightly less construction would occur under this alternative, this impact would be slightly less than the proposed project.

Similar to the proposed project, implementation of this alternative, which would result in slightly less residential development, would not otherwise substantially degrade water quality, place housing or structures within a 100-year flood zone, or expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam. There would be *no impact* with respect to these thresholds. In addition, there would be *no impact* that would expose people or structures under this alternative to a significant risk of loss, injury, or death involving inundation by a seiche, tsunami, or mudflow.

Land Use

Existing land uses within the project area are primarily characterized as commercial with pockets of high-density residential uses in the northwestern and northeastern portions of the downtown area. Development under this alternative would include less residential and office development compared to the proposed project. Minor inconsistencies would occur between Alternative 3 and the existing applicable land use plans governing development of the project area, similar to that identified for the proposed project. Amendments to the General Plan and Zoning Code would be undertaken to ensure conformity with the development proposed under this alternative. Similar to the proposed project, the intention of this alternative is to provide mixed use residential and mixed use commercial communities, which would enhance the efficiency and daily activity within the project area, but would occur in a different ratio than that under the proposed project. In addition, the neighborhoods/districts outlined under the Overlay Zone loosely conform to the types of uses and neighborhoods identified under this alternative. Overall changes to the land use character would be similar to that described for the proposed project, but would result in different densities and lower building heights. On the whole, impacts would be *less than significant* under this alternative, and similar to the proposed project.

Noise

Under Alternative 3, future development could expose sensitive receptors in the project area to excessive noise levels because residential uses would be developed adjacent to commercial retail uses. Consequently, the noise impacts to residential land uses along major thoroughfares would be similar to the proposed project, and would remain *significant and unavoidable*.

Similar to the proposed project, construction activities under this alternative would be subject to the City's Municipal Code standards, and construction noise would be controlled. This impact would be *less than significant*, similar to the proposed project.

Operational noise impacts would be incrementally less under this alternative due to the potential reduction in vehicle trips. As a result, impacts would be less than the proposed project although still *potentially significant*.

Population and Housing

The proposed infill development under this alternative would make maximum use of existing infrastructure, and future development would be required to include provisions to make any necessary improvements and to fund their fair share allocation of those costs. Thus, the indirect population growth impact resulting from infrastructure improvements associated with this alternative is considered *less than significant*, similar to the proposed project.

Full buildout of Alternative 3 would result in similar impacts to population and housing as compared to the proposed project. Reduced development potential would include approximately 2,586 fewer residential units, among other density and height land use changes. The reduction in residential uses would also reduce the anticipated population by approximately 5,172 residents, for a total increase of approximately 5,930 persons. Because the projected increase of the anticipated residents in the City resulting from the proposed project is within, or under the limit of, the total population increase projected for the City between 2005 and 2030, and because this alternative would result in fewer new residents, the forecasted population growth in the City is not considered substantial relative to the surrounding areas. Due to the fact that the population growth forecasted for the City of Santa Ana is not considered substantial in comparison to the surrounding areas (i.e., Arroyo-Verdugo Subregion and Los Angeles County) and the direct population increase associated with the proposed project housing units was "planned for" due to its inclusion in the population/housing projections and planning documents (e.g., City General Plan, SCAG RHNA), the impacts associated with the direct population growth as a result of this alternative are considered *less than significant*.

Because fewer residential units could be constructed and a resulting lower population increase would occur under this alternative, this impact would be less in magnitude when compared to the proposed project. In addition, this alternative would result in a potential decrease in employment opportunities within the Overlay Zone, based on the "Commercial Energy Consumption Survey" prepared by the Department of Energy in 1995. Overall, this alternative would result in a reduction of approximately

158 employees compared to existing conditions and 2,501 employees less than the proposed project. As such, *no impact* would occur, and would be less in magnitude compared to the proposed project.

The beneficial impact of providing a net increase in residential housing units to meet increased housing needs would be realized under Alternative 3, but to a lesser degree than the proposed project. Due to the fact that Alternative 3 would provide 2,586 fewer residential units than the proposed project, this alternative would not perform as well as the proposed project in addressing a potential future housing shortage issue in the City and result in pressures on transitional areas zoned multi-family residential to redevelop to the maximum zoned capacity to provide more housing near jobs, to meet regional forecasts, and generally responding to employees trying to get closer to existing job centers to reduce their commute.

Public Services

As the population increase would be less under this alternative when compared to the proposed project, impacts to public services would also be less than the proposed project, as discussed below.

The same types of development would be permitted throughout the project area and approximately half of the residential development of the proposed project could occur under this alternative. Therefore, the anticipated number of calls is expected to be similar to the proposed project, and would not be above the recommended workload for a rescue ambulance. Similarly, all new buildings developed under this alternative would be constructed in accordance with the City's Building Code and would be required to have adequate fire code requirements. Implementation of this alternative would still not result in a substantial reduction in the firefighter per resident ratio within the City, similar to the proposed project. As such, impacts would also be *less than significant*.

All new development places an increased burden on police services and causes a need for increased staff and increased space. Security concerns related to new uses within the project area would be addressed through the permit process, at which time the Santa Ana Police Department would have the opportunity to review the proposed uses and provide input on necessary security measures. Persons on-site or elsewhere in the City would not be exposed to increased risks as a result of the additional demands on the Santa Ana Police Department as a result of development under this alternative. Further, the present police officer to population service ratio would be similar to the proposed project, and impacts would be *less than significant*.

Slightly fewer residential units would be developed under this alternative, which in turn, would result in slightly fewer students when compared to the proposed project. The Tustin Unified School District currently collects developer fees for mitigation of school impacts. Government Code Section 53080, payment of development fees is considered full mitigation for significant school impacts. Therefore, the impact on schools from this alternative would be *less than significant*, similar to the proposed project, although slightly less.

While this alternative would include the addition of residents to the project area, and result in a decrease to the ratio of books per resident, the citywide volume per resident is already above the City standard. As

slightly fewer residential units would be developed under this alternative, the impact to library services would be less than the proposed project. However, an increase in 5,414 residents would increase demand on library services and would be considered potentially significant. Implementation of mitigation, such as mitigation measure MM-OZ 4.11-4, would ensure that the appropriate level of library facilities are provided and that impacts would remain *less than significant*, similar to the proposed project.

Similarly, implementation of Alternative 3 would result in a lesser potential demand for additional recreational facilities in the project area, nonetheless it could result in the increased use of parks and recreational facilities. Payment of developer fees, such as those discussed under mitigation measure MM-OZ 4.11-5, would ensure that adequate parkland is provided for all City residents per the City's Municipal Code. As such, impacts would be *less than significant*, similar to the proposed project, although the anticipated level of parkland required for implementation of this alternative would be less than the proposed project.

Transportation

As development under this alternative would involve an intensification of uses, traffic volumes along local street segments are anticipated to increase. The impacts to intersections would remain *potentially significant*, although less so than under the proposed project. As buildout of both the proposed project and this alternative would both be subject to City code in regards to parking, impacts to parking would be similar to the proposed project and *less than significant*. Impacts to emergency access would comply with existing policies contained in the General Plan and Municipal Code, and would be *less than significant*, similar to the proposed project.

Utilities

Alternative 3, at buildout, would directly increase the population of the City by approximately 5,930 residents, resulting in increased demands for utilities. As the population increase would be less than under the proposed project, demands on utilities would be correspondingly less, and impacts would be *less than significant*.

5.4 SUMMARY COMPARISON OF ALTERNATIVES

Table 5-3 below summarizes the level of significance and relative magnitude of impacts from each alternative, when compared to the proposed project.

5.5 ATTAINMENT OF PROJECT OBJECTIVES

The No Project/Reasonably Foreseeable Development Alternative would achieve some of the project objectives, but would not achieve others (or would achieve them to a lesser degree than the proposed project.) Alternative 2 would achieve all of the project objectives, similar to the proposed project. Alternative 3 would achieve some of the project objectives, but would not improve the jobs/housing balance within the City to the level of the proposed project.

5.6 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

An EIR is required to identify the environmentally superior alternative from among the range of reasonable alternatives that are evaluated. This would ideally be the alternative that results in fewer (or no) significant and unavoidable impacts. CEQA Guidelines Section 15126(d)(2) states that if the environmentally superior alternative is the no project alternative, the EIR shall also identify an environmentally superior alternative from among the other alternatives.

Alternative 1 (No Project/Reasonably Foreseeable Development [Continuation of Existing General Plan]) does not reduce any of the proposed project's significant impacts to a less-than-significant level, it does lessen the severity of many of the impacts, as noted in Table 5-3 (Summary Comparison of Alternatives). Similarly, Alternatives 2 and 3 would reduce the potential impacts of the currently proposed Overlay Zone, although not to the degree of Alternative 1. Alternative 1 would, therefore, be environmentally superior to the proposed project because the significant environmental impacts to air quality, noise, and transportation would be lessened to the greatest extent, since this alternative proposes the least amount of future residential and overall development. However, Alternative 1 does not fully meet the project objectives, as noted above.

Table 5-3 Summary Comparison of Alternatives

<i>Environmental Issue Area</i>	<i>Proposed Project</i>	<i>Alternative 1 (No Project/Reasonably Foreseeable Development)</i>	<i>Alternative 2 (Higher Intensity Commercial)</i>	<i>Alternative 3 (Reduced Project)</i>
Aesthetics	LTS	-	=	=
Air Quality	(3) SU	(3) SU/=	(3) SU/=	(3) SU/-
Biological Resources	LTS	=	=	=
Cultural Resources	LTS	=	=	=
Geology	LTS	=	=	=
Hazards and Hazardous Materials	LTS	=	=	=
Hydrology	LTS	=	=	=
Land Use	LTS	-	=	=
Noise	(2) SU	(2) SU/-	(2) SU/=	(2) SU/-
Population and Housing	LTS	-	-	-
Public Services	LTS	-	-	-
Transportation	(2) SU	(2) SU/-	(2) SU/-	(2) SU/-
Utilities and Service Systems	LTS	-	-	-

(SU) = Significant and Unavoidable

(LTS) = Less Than Significant

(-) = Impacts considered to be less when compared with the proposed project.

(+) = Impacts considered to be greater when compared with the proposed project.

(=) = Impacts considered to be equal or similar to the proposed project.