

7. Alternatives to the General Plan Update

7.1 INTRODUCTION

This section of the Recirculated Draft PEIR updated the original Draft PEIR to include a new project alternative to address the significant Recreation impact of the General Plan Update (GPU) as proposed (see Section 5.15, *Recreation*). In accordance with CEQA, the Reduced Park Demand Alternative has been defined and evaluated for its potential to lessen or eliminate significant impacts of the proposed project.

7.1.1 Purpose and Scope

The California Environmental Quality Act (CEQA) requires that an environmental impact report (EIR) include a discussion of reasonable project alternatives that would “feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any significant effects of the project, and evaluate the comparative merits of the alternatives” (CEQA Guidelines § 15126.6[a]). As required by CEQA, this chapter identifies and evaluates potential alternatives to the General Plan Update (GPU).

Section 15126.6 of the CEQA Guidelines explains the foundation and legal requirements for the alternatives analysis in an EIR. Key provisions are:

- “[T]he discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.” (15126.6[b])
- “The specific alternative of ‘no project’ shall also be evaluated along with its impact.” (15126.6[e][1])
- “The no project analysis shall discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. If the environmentally superior alternative is the ‘no project’ alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.” (15126.6[e][2])
- “The range of alternatives required in an EIR is governed by a ‘rule of reason’ that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project.” (15126.6[f])
- “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

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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)” (15126.6[f][1]). “Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR.” (15126.6[f][2][A])C

- “An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative.” (15126.6[f][3])

For each development alternative, this analysis:

- Describes the alternative.
- Analyzes the impact of the alternative as compared to the GPU.
- Identifies the impacts of the project that would be avoided or lessened by the alternative.
- Concludes whether the alternative would eliminate a significant, unavoidable impact compared to the proposed GPU.
- Assesses whether the alternative would meet most of the basic project objectives.
- Evaluates the comparative merits of the alternative and the project.

According to Section 15126.6(d) of the CEQA Guidelines, “[i]f an alternative would cause...significant effects in addition those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed.”

7.1.2 Project Objectives

As described in Section 3.2, the following objectives have been established for the GPU and will aid decision makers in their review of the project, the project alternatives, and associated environmental impacts.

1. Promote infill development while respecting and protecting established neighborhoods.
2. Optimize high density residential and mixed-use development that maximizes potential use of mass transit.
3. Provide locations for new housing development that maximizes affordable housing opportunities to achieve both City and regional housing goals.
4. Facilitate new development at intensities sufficient to generate community benefits and attract economic activity.
5. Provide housing and employment opportunities at an urban level of intensity at the city’s edge.
6. Introduce mixed-use urban villages and encourage experiential commercial uses that are more walkable, bike friendly, and transit oriented.
7. Develop opportunities for live/work, artist spaces, and small-scale manufacturing.

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7.1.3 Significant Impacts of the Project

As discussed above, a primary consideration in defining project alternatives is their potential to reduce or eliminate significant impacts of the GPU. The impact analysis in Chapter 5 of this updated Draft PEIR concludes that implementation of the GPU would result in the following significant impacts.

7.1.3.1 SIGNIFICANT UNAVOIDABLE IMPACTS

Air Quality

- **Impact 5.2-1** The General Plan Update would be inconsistent with the South Coast Air Quality Management Plan (AQMP) because buildout under the plan would exceed the population estimates assumed for the AQMP and would cumulatively contribute to the nonattainment designations of the South Coast Air Basin (SoCAB).
- **Impact 5.2-2** Construction activities associated with buildout of the General Plan Update would generate short-term emissions that exceed the South Coast Air Quality Management District (AQMD's) significance thresholds and cumulatively contribute to the nonattainment designations of the SoCAB.
- **Impact 5.2-3** Buildout in accordance with the General Plan Update would generate long-term emissions that would exceed South Coast AQMD's regional significance thresholds and cumulatively contribute to the nonattainment designations of the SoCAB.
- **Impact 5.2-4** Buildout of the General Plan Update could expose sensitive receptors to substantial concentrations of toxic air contaminants.
- **Impact 5.2-5** Construction and operation emissions generated by individual development projects have the potential to exceed South Coast AQMD's Local Significance Thresholds.

Cultural Resources

- **Impact 5.4-1** The proposed General Plan Update would allow development in areas that have historic resources identified by previous cultural resource surveys. Development in these areas would, therefore, potentially cause the disturbance of historic resources in the plan area.

Greenhouse Gas Emissions

- **Impact 5.7-1** Implementation of the proposed General Plan Update would result in a decrease in GHG emissions in horizon year 2045 in comparison to existing conditions but may not meet the long-term GHG reduction goal under Executive Order S-03-05.

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Noise

- **Impact 5.12-1** Due to the potential for proximity of construction activities to sensitive uses, the number of construction projects occurring simultaneously, and the potential longevity of construction activities, construction noise could result in a temporary substantial increase in noise levels above ambient conditions.
- **Impact 5.12-2** Buildout of the individual land uses and projects for implementation of the General Plan Update would expose existing residences to project-generated traffic noise.

Population and Housing

- **Impact 5.13-1** At buildout, the General Plan Update would result in an increase in population and housing units that exceeds the Orange County COG projections by approximately 20 and 38 percent, respectively. There are no feasible mitigation measure and impacts would be significant and unavoidable.

Recreation

- **Impact 5.15-1:** The General Plan Update would generate additional residents that would increase the use of existing park and recreational facilities such that substantial physical deterioration of the facility could occur or be accelerated.
- **Impact 5.15-2** Population increases resulting from project implementation would increase recreation demands that would require construction or expansion of recreation facilities that would have potential to result in physical impacts to the environment.

7.1.3.2 SIGNIFICANT UNTIL MITIGATED IMPACTS

Air Quality

- **Impact 5.2 6** Industrial land uses accommodated under the General Plan Update could create other emissions, such as those leading to objectionable odors, that would adversely affect a substantial number of people.

Biological Resources

- **Impact 5.3-1** Buildout under the General Plan Update could impact plant and animal species and habitat that are sensitive or protected under federal and/or California regulations.
- **Impact 5.3-4** Implementation of the General Plan Update could impact wildlife corridors and nesting sites.

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Cultural Resources

- **Impact 5.4-2** Development consistent with the General Plan Update could impact archeological resources.

Geology and Soils

- **Impact 5.6-4** Paleontological resources could be impacted by development resulting from the implementation of the General Plan Update.

Noise

- **Impact 5.12-3** The potential for sensitive receptors within the plan area to be exposed to annoying and/or interfering levels of vibration from commercial or industrial operations and existing railroad lines, operations-related vibration impacts associated with implementation of the GPU are considered potentially significant.

Tribal Cultural Resources

- **Impact 5.17-1** Buildout consistent with the General Plan Update could adversely impact tribal cultural resources that are listed in a register.
- **Impact 5.17-2** Buildout consistent with the General Plan Update could adversely impact tribal cultural resources pursuant to criteria in Public Resources Code Section 5024.1(c).

7.2 ALTERNATIVES CONSIDERED AND REJECTED DURING THE SCOPING/PROJECT PLANNING PROCESS

“Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts” (CEQA Guidelines § 15126.6[c]).

7.2.1 Alternative Mobility Element: Roadway Classifications

The proposed Mobility Element as included in the GPU evolved over a long process and coordination with the Orange County Transportation Authority (OCTA). During this process, alternative packages of arterial roadway classifications were considered that involved roadways included in OCTA’s Master Plan of Arterial Highways (MPAH). The majority of reclassifications proposed were identified for bicycle facility safety improvements in the City’s Safe Mobility Santa Ana (SMSA) Plan prepared in 2016. Most of the reclassifications identified were for roadways where bicycle and pedestrian safety improvements would require roadway reconfiguration and a reduction in the number of existing or planned travel lanes. Many of the SMSA recommendations across the city have already been or are in the process of being implemented along arterial roadways without reducing the number of lanes.

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A cursory review of two optional roadway reclassification packages was conducted to determine whether these optional plans would have the potential to eliminate significant impacts of the proposed GPU and meet most the project objectives. It was determined that a detailed evaluation of this alternative was not needed to provide a reasonable range of EIR project alternatives. Transportation/traffic impacts of the proposed project were determined to be less than significant—vehicle miles traveled per service population (VMT/SP) falls below the significance threshold for the GPU without mitigation. Although these alternatives may have some potential to reduce VMT (by reducing the number of travel lanes for some roadways) and thereby also potentially reduce air quality, greenhouse gas (GHG), and traffic noise impacts, these alternatives would also result in more inconsistencies with the MPAH and result in more traffic congestion. Although traffic congestion is no longer a CEQA consideration, the GPU sets standards for level of service that will be considered by decision-makers. Moreover, the Reduced Density and RTP/SCS were determined to provide meaningful alternatives to consider for the potential of reducing air quality, GHG, and traffic noise impacts.

7.2.2 Reduced Traffic Noise Alternative

Since traffic noise was determined to be a significant, unavoidable impact of the proposed GPU, a project alternative designed to eliminate this significant impact was considered. The required reduction in traffic volumes, or average daily traffic (ADT), along roadways where buildout of the GPU would result in significant increases in noise were determined. These estimates were compared to the surrounding land uses that would generate ADTs for the respective roadway segments. Table 7-1, *Roadway Segments with Significant Traffic Noise Increases*, lists the roadways that would experience significant noise impacts under the GPU. Traffic noise along these roadways would both exceed the noise standard and abut sensitive land uses (e.g., residences, schools, hospitals).

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Table 7.1 Roadway Segments with Significant Traffic Noise Increases

Roadway	Segment	Existing ADT	Future 2045 ADT w/GPU	Existing Traffic Noise Level at 50 feet (dBA CNEL)	Future 2045 Traffic Noise Level at 50 feet w/GPU (dBA CNEL)	Traffic Noise Increase, dBA CNEL
Harbor Boulevard	Segerstrom Avenue to MacArthur Boulevard	47,125	56,900	71.9	77.6	5.7
ADT Reduction Required ¹			21,500			
Sensitive Receptors: Hotel						
Main Street	17th Street to 20th Street	32,044	43,000	72.5	74.1	1.6
ADT Reduction Required			42,000			
Sensitive Receptors: Church						
Segerstrom Avenue	Fairview Street to Raitt Street	19,326	29,600	71.2	73.6	2.4
ADT Reduction Required ¹			24,000			
Sensitive Receptors: Residences						
Bristol Street	Edinger Avenue to Warner Avenue	37,238	54,500	74.4	76.3	1.9
ADT Reduction Required ¹			50,000			
Sensitive Receptors: Schools and Residences						
Flower Street	Warner Avenue to Segerstrom Avenue	15,378	33,300	70.1	73.9	3.8
ADT Reduction Required ¹			19,500			
Sensitive Receptors: Residences						
Main Street	MacArthur Boulevard to Sunflower Avenue	23,692	29,000	73.1	74.7	1.6
ADT Reduction Required ¹			28,500			
Sensitive Receptors: Residences						

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Table 7.1 Roadway Segments with Significant Traffic Noise Increases

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Grand Avenue	Edinger Avenue to Warner Avenue	17,735	37,300	71.1	75.7	4.7
ADT Reduction Required ¹			18,000			
Sensitive Receptors: Library						
Warner Avenue	Grand Avenue to Red Hill Avenue	22,435	34,600	73.1	75.4	2.4
ADT Reduction Required ¹			28,500			
Sensitive Receptors: Church, Dyer Focus Area						
Dyer Road	Red Hill Avenue to Pullman Street	31,248	57,500	74.1	78.0	3.9
ADT Reduction Required ¹			46,000			
Sensitive Receptors: Hotel						
Main Street	La Veta Avenue to Memory Lane	31,004	50,200	73.8	75.9	2.1
ADT Reduction Required ¹			43,000			
Sensitive Receptors: Hospital, Residences at 200 feet – traffic noise would attenuate to 64 dBA CNEL at residences.						

Source: Based on FHWA's traffic noise prediction model methodology using roadway volumes, vehicle mix, time of day splits, and number of lanes provided by IBI 2020.

Note: **Bold** values = significant traffic noise increase

¹ Indicates approximate ADT reduction needed to reduce impact to be less than significant.

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As summarized in the table, several segments would experience significant, unavoidable traffic noise impacts without the land use changes proposed under the GPU. Since significant traffic noise could not be avoided, further evaluation of this alternative was not deemed meaningful.

7.3 ALTERNATIVES SELECTED FOR FURTHER ANALYSIS

Given the significant, unavoidable impacts identified for the proposed GPU, project alternatives with the potential to substantially reduce development were identified for further review. Significant GPU impacts such as long-term air quality impacts, GHG emissions, population and housing impacts, and recreation impacts directly relate to the level of development anticipated in the city. At the programmatic level of this GPU EIR, site-specific information regarding potential significant historical impacts is not available, and therefore an alternative could not be customized to reduce that impact. A reduced intensity alternative would also be expected to reduce the significant traffic noise impact (as discussed above). The following development alternatives to the proposed GPU were chosen for further analysis:

- **No Project/Current General Plan Alternative.** The evaluation of the No Project alternative is required by CEQA. The No Project alternative is typically defined as the development scenario that would occur if the project as proposed is not adopted. For a General Plan, the No Project alternative is typically represented by the jurisdiction's existing general plan, including land use plan, circulation master plan, and policies included in each general plan element. Therefore, this alternative assumes that the existing General Plan, with various adoption dates for different elements between 1982 and 2014, would remain in effect. This existing General Plan also reflects amendments, including new Specific Plans and special zoning areas that have been adopted up through the Notice of Preparation for this GPU.
- **Reduced Intensity Alternative** (Reduced capacity for the 55 Fwy/Dyer Road and South Bristol focus areas). Under the GPU, the only areas that include revisions to land use designations to accommodate new growth are within the five focus areas. The majority of remaining growth, as detailed in Table 3-8, would occur within previously approved Specific Plans and Special Zoning areas. A nominal amount of growth is assumed in other areas of the city and would not require land use amendments. The Reduced Intensity Alternative would substantially reduce development capacity in two focus areas, 55 Fwy/Dyer Road and South Bristol Street, that accommodate approximately 65 percent of the housing unit growth and 72 percent of the nonresidential use (by building square footage) of the growth projected for the combined focus areas under the GPU. Section 3.3.2.5, *General Plan Buildout Scenario*, provides a discussion of factors considered in determining assumed buildout densities for the GPU. For the focus areas, the forecast buildout is based on development at approximately 80 percent of the maximum allowed development for each respective land use designation. For this alternative, development of the 55 Fwy/Dyer Road and South Bristol focus areas would be reduced to approximately 50 percent of the maximum allowed per the land use designations. As detailed in Table 7-5, this alternative would reduce housing units by 5,383 and would reduce total building square footage by approximately 4.2 million square feet distributed between these two focus areas. This alternative would also reduce population by 19,825 and jobs by 9,184. Overall, this alternative would reduce the housing growth accommodated by the GPU land use changes by approximately 18 percent and reduce nonresidential building square footage by approximately 27 percent.

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- **2020 RTP/SCS Consistency Alternative** (Reduced development for RTP/SCS population/housing consistency). This alternative was developed to evaluate an update to the General Plan that would be consistent with the population and housing projections used to develop the Southern California Association of Governments' (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), now referred to as Connect SoCal (adopted May 7, 2020). Connect SoCal is a long-range visioning plan that balances future mobility and housing needs with economic, environmental and public health goals. The plan embodies a collective vision for the region's future and is developed with input from local governments, county transportation commissions, tribal governments, nonprofit organizations, businesses, and local stakeholders in the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura. As evaluated in Section 5.13-7, *Population and Housing*, the proposed GPU would result in a significant population and housing impact because development under the GPU would substantially exceed the projections used in Connect SoCal. SCAG uses locally prepared population and housing projections to develop the regional plan. For the City of Santa Ana, those projections were provided by the Orange County Council of Governments as prepared by the Center for Demographic Research. The population/housing figures reflected for Santa Ana in the regional plan for 2045 are: population, 360,100; total housing units: 80,100; and total jobs, 176,400. Projections for the RTP/SCS (Connect SoCal) use land use designations as approved in the adopted General Plan. The employment projections are similar for the GPU and RTP/SCS scenarios, but the RTP/SCS projections for population and housing units are substantially lower than GPU projections (18 percent and 27 percent lower, respectively). The RTP/SCS alternative, therefore, represents the least development intensive project alternative evaluated for the original Draft PEIR.

This alternative would substantially reduce the growth that would be accommodated within the focus areas under the GPU. New growth within the focus areas would total 6,380 housing units and approximately 3.7 million square feet of nonresidential uses instead of a total additional 23,955 housing units and approximately 15.7 million square feet of nonresidential uses in the focus areas. This alternative distributes anticipated development throughout the focus areas and the approved Specific Plan/Special Zoning areas. For purposes of this alternative, it is assumed that a development cap would be used to limit total growth to the projections shown.

Subsequent updates of the regional plan would incorporate updated land use from the GPU and resolve the substantial discrepancy between the population and housing projections. Note also that the original Draft PEIR concluded that the GPU is consistent with the goals of the RTP/SCS (see Table 5.10-1). This alternative has been defined to eliminate the significant impact associated with substantial population growth that is inconsistent with the regional plan, and to reduce other significant, growth-related impacts (AQ/GHG, traffic noise) associated with the GPU as proposed.

- **Reduced Park Demand Alternative.** As described in Section 5.15, *Recreation*, a substantial level of controversy surrounds the potential impact of GPU implementation on the recreation opportunities in Santa Ana. Numerous comments on this issue were received during the comment period for the original Draft PEIR as well as during the Planning Commission public hearing (November 9, 2020). The community emphasized that the City's park standard of 2 acres per 1,000 residents is not achieved under existing conditions and that development allowed under the GPU would further exacerbate park and open

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space shortages. Residents also noted that park access is not equitable throughout the city, and several disadvantaged neighborhoods would be disproportionately affected by high-density development and higher use of limited parks in their communities. The City of Tustin commented on the lack of parks to serve proposed high density in development in the 55 Fwy/Dyer Road focus area and the potential for new residents to use parks in Tustin.

The areas proposed for substantial new residential development under the GPU were compared to the distribution of existing parks—location, size, and demand—to define the *Reduced Park Demand Alternative* (see Figures 5.1-2, *Park Deficiency Areas with Neighborhoods*, and 5.15-3, *Park Deficiency w/Overlays*). Unless new parks are constructed, growth in any of the focus areas would exacerbate the current level of park deficiency either in or adjacent to disadvantaged, environmental justice (EJ) communities. The *Reduced Park Demand Alternative*, therefore reduces residential growth by 11,225 units by eliminating or reducing residential land uses and intensity in the five focus areas. Overall, nonresidential square footage would be reduced by a total of approximately 2.8 million square feet within the focus areas compared to the proposed GPU. The nonresidential square footage would increase, however, in two of the focus areas: 17th Street/Grand Avenue by 697,000 square feet, and South Bristol by 739,000 square feet. New residential growth under this alternative would largely be in currently planned areas that are generally near a substantial number of existing park facilities. Some residential growth would be introduced into two focus areas at substantially lower intensities to reduce the potential impact on park facilities.

- **South Main Street.** This focus area would remain as currently planned as a commercial corridor (GC) instead of Urban Neighborhood (UN) and District Center (DC) to reduce intensity so that there are no additional units constructed beyond existing conditions; there is a significant presence of EJ communities that are served by parks, but the existing parks are very small.
- **South Bristol Focus Area.** District Center (DC) changed to Urban Neighborhood (UN) to reduce intensity by 2,273 units on sites that are more than a half mile from existing parks (generally west of Bristol and south of MacArthur Boulevard).
- **Grand Avenue/17th Street.** Stay as currently planned as a lower density residential (LR-7) and commercial corridor (GC) to reduce intensity so that there are no additional units constructed beyond existing conditions, because much of the focus area is more than a half mile from existing parks.
- **West Santa Ana Boulevard.** This focus area would remain as currently planned with lower density residential (LR-7) instead of Urban Neighborhood (UN) to reduce intensity so that no additional units are constructed beyond existing conditions; there is a significant presence of EJ communities with areas that are farther than a half mile from existing parks in this focus area.
- **55 Freeway/Dyer Road.** District Center (DC) changed to Urban Neighborhood (UN) to reduce intensity by 5,381 units because a majority of the area is more than a half mile from existing parks in Santa Ana; the reduced intensity would also reduce potential impacts on adjacent parkland in Tustin.

Table 7-2 summarizes the three alternatives described above selected for evaluation. They have been determined to represent a reasonable range of alternatives that have the potential to feasibly attain most of the basic

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objectives of the GPU, but which may avoid or substantially lessen any of the significant effects. Note that Recreation has been added as an “Environmental Reason Considered” for each of the development project alternatives. In the original Draft PEIR, Recreation was not determined to be a significant, unavoidable impact of the proposed project, but it was updated in the Recirculated Draft PEIR to be classified as significant. Each of the development alternatives reduces development in comparison to the proposed GPU, and therefore has the potential to reduce recreation impacts. The discussion to consider the potential for these alternatives to reduce/eliminate this significant impact has been included in the updated table.

Table 7-2 Project Alternatives Description

Alternative Description	Environmental Reasons Considered
<p>Proposed Project</p> <p>The GPU is the comprehensive update of the Santa Ana General Plan. As detailed in Chapter 3, <i>Project Description</i>, land use changes in the proposed GPU focus on five areas in Santa Ana that offer opportunities for enhanced growth and flexibility and are suited to assist in achieving the core vision established for the GPU. These focus areas are:</p> <ul style="list-style-type: none"> • South Main Street • Grand Avenue/17th Street • West Santa Ana Boulevard • 55 Freeway/Dyer Road • South Bristol Street 	N/A
<p>No Project/Current General Plan Alternative</p> <p>The buildout for the current GP includes the full entitlement of the specific plan and special zoning areas. The current GP focuses more on employment growth in the focus areas instead of housing growth.</p>	Required by CEQA
<p>Reduced Intensity Alternative</p> <p>Development potential for the two focus areas with the greatest growth capacity under the GPU is reduced under this alternative to approximately 50 percent of the maximum densities allowed by their respective land use designations for both housing units and nonresidential building square footage. The combined reduction for the 55 Freeway /Dyer Rd. and South Bristol Street focus areas under this alternative would be 5,383 housing units and 4.3 MSF. There would be no changes to any other proposed land use or to the Circulation-Mobility Element under the Reduced Intensity Alternative in comparison to the proposed GPU. All other assumptions remain the same as for the proposed GPU.</p>	<p>Potential to reduce significant impacts related to:</p> <ul style="list-style-type: none"> • Air Quality • Greenhouse Gas Emissions • Noise • Population and Housing • Recreation
<p>2020 RTP/SCS Consistency Alternative</p> <p>To achieve the lower projections reflected in the RTP/SCS, this alternative would substantially reduce the growth that would be accommodated within the focus areas under the GPU. Instead of a total additional 23,955 housing units and approximately 15.7 MSF within the focus areas, new growth within the focus areas would total 6,380 housing units and approximately 3.7 MSF nonresidential uses (reducing the growth by over 70 percent for both housing and nonresidential building SF relative to the GPU for focus areas). New development would primarily take place through pipeline projects that are already approved within the Specific Plan and Special Zoning Districts. The total estimated buildout of these projects, however, could not be completely accommodated. As shown in Table 7-6, this alternative, therefore, distributes anticipated development throughout the focus areas and the approved Specific Plans/Special Zoning areas. For purposes of this alternative, it is assumed that a development cap would be used to limit total growth to the projections shown. Existing development entitlements would not be reduced, but development would be monitored and capped at the levels shown. The market would drive the precise location and timing of projects until the maximum cap was reached.</p>	<p>Potential to reduce significant impacts related to:</p> <ul style="list-style-type: none"> • Population and Housing • Air Quality • Greenhouse Gas Emissions • Noise • Recreation

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Table 7-2 Project Alternatives Description

Alternative Description	Environmental Reasons Considered
<p>Reduced Park Alternative</p> <p>As with the other project alternatives, in comparison to the proposed GPU, the Reduced Park Alternative would only modify land uses within the five focus areas. It would result in an overall 47 percent reduction in housing units within the focus areas, from 23,955 units for the proposed GPU to 12,730 units for this project alternative. No residential units beyond existing units would be constructed in the following focus areas: 17th Street/Grand Avenue, South Main Street, and West Santa Ana Boulevard. In comparison to the proposed GPU, new residential units in the 55 Freeway/Dyer Road focus area would be reduced by 5,381 units (for a remaining total of 4,571 new units), and new units in the South Bristol Street focus area would be reduced by 2,273 units for a total of 3,220 new units at buildout. Nonresidential square footage would be reduced by approximately 2.8 MSF total within the focus areas in comparison to the proposed GPU.</p> <p>The reduction in units within the 55 Freeway/Dyer Road and South Bristol Street focus areas would be from those areas characterized as more than ½ mile from park facilities.</p>	<p>Potential to reduce significant impacts related to:</p> <ul style="list-style-type: none"> • Air Quality • Greenhouse Gas Emissions • Noise • Population and Housing • Recreation
<p>Notes: MSF = million square feet. RTP/SCS = Southern California Association of Governments' Regional Transportation Plan and Sustainable Communities Strategy.</p>	

An EIR must identify an “environmentally superior” alternative, and where the No Project Alternative is identified as environmentally superior, the EIR is required to identify as environmentally superior an alternative from among the others evaluated. Each alternative's environmental impacts are compared to the GPU and determined to be environmentally superior, neutral, or inferior. Section 7.7 identifies the environmentally superior alternative. The proposed GPU (preferred land use alternative) is analyzed in detail in Chapter 5 of the updated Draft PEIR.

7.3.1 Alternatives Comparison

The following statistical analysis provides a summary of general socioeconomic buildout projections for the three land use alternatives and the proposed GPU. The analysis provides a buildout scenario that would occur if all the areas of the city were to develop to the probable capacities yielded by each respective project alternative. Table 7-3 identifies citywide information regarding housing unit, population, and job projections, and also provides the resultant jobs-to-housing ratio for each alternative. Tables 7-4 through 7-6 provide detailed comparisons between the GPU and the proposed alternatives for housing units, nonresidential square footage, and jobs by focus area and Specific Plan/Special Zoning area.

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Table 7-3 Project Alternatives: Socioeconomic Comparison

	General Plan Update	No Project/Current General Plan Alternative	Reduced Intensity Alternative	2020 RTP Population/Housing Consistency Alternative	Reduced Park Demand Alternative
Dwelling Units	115,053	101,858	109,670	83,538	103,828
Population	431,629	383,202	411,804	352,941	389,518
Jobs	170,416	182,003	161,232	172,545	164,482
Jobs-to-Housing Ratio	1.5	1.8	1.5	2.1	2.4

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Table 7-4 No Project/Current General Plan vs. Proposed GPU: Buildout Comparison

PLANNING AREA	Proposed General Plan Update			No Project/Current General Plan			Net Difference		
	Housing Units	Bldg. Sq. Ft. ³	Jobs	Housing Units	Bldg. Sq. Ft. ¹	Jobs	Housing Units	Bldg. Sq. Ft. ¹	Jobs
FOCUS AREAS	23,955	15,684,285	35,044	10,760	18,350,142	46,631	-13,195	2,665,857	11,587
55 Freeway/Dyer Road	9,952	6,142,283	13,302	2,730	6,518,616	19,145	-7,222	376,333	5,843
Grand Avenue/17th Street	2,283	703,894	1,622	517	2,419,688	5,360	-1,766	1,715,794	3,738
South Bristol Street	5,492	5,082,641	11,192	3,260	4,136,428	11,078	-2,232	-946,213	-114
South Main Street	2,308	946,662	2,151	1,641	2,428,499	4,947	-667	1,481,837	2,796
West Santa Ana Boulevard	3,920	2,808,805	6,777	2,612	2,846,911	6,101	-1,308	38,106	-676
SPECIFIC PLAN / SPECIAL ZONING	20,524	16,958,445	39,702	20,524	16,958,445	39,702	0	0	0
Adaptive Reuse Overlay Zone ²	1,260	976,935	2,567	1,260	976,935	2,567	0	0	0
Bristol Street Corridor Specific Plan	135	143,139	282	135	143,139	282	0	0	0
Harbor Mixed Use Transit Corridor Specific Plan	4,622	1,967,982	1,578	4,622	1,967,982	1,578	0	0	0
MainPlace Specific Plan	1,900	2,426,923	5,380	1,900	2,426,923	5,380	0	0	0
Metro East Mixed-Use Overlay Zone	5,551	4,685,947	12,258	5,551	4,685,947	12,258	0	0	0
Midtown Specific Plan	607	1,818,253	4,615	607	1,818,253	4,615	0	0	0
Transit Zoning Code	6,449	4,939,266	13,022	6,449	4,939,266	13,022	0	0	0
ALL OTHER AREAS OF THE CITY³	70,574	40,325,086	95,670	70,574	40,325,086	95,670	0	0	0
CITYWIDE TOTAL	115,053	72,967,816	170,416	101,858	75,633,673	182,003	-13,195	2,665,857	11,587

Source: Santa Ana 2020.

¹ Only includes nonresidential building square footage.

² The figures shown on the row for the Adaptive Reuse Overlay represents parcels that are exclusively in the Adaptive Reuse Overlay boundary. Figures for parcels that are within the boundaries of both the Adaptive Reuse Overlay Zone and a specific plan, other special zoning, or focus area boundary are accounted for in the respective specific plan, other special zoning, or focus area.

³ The City has included an assumption for growth on a small portion (5 percent) of residential parcels through the construction of second units, which is distributed throughout the city and is not concentrated in a subset of neighborhoods. Additional growth includes known projects in the pipeline and an increase of 10 percent in building square footage and employment for the professional office surrounding the Orange County Global Medical Center and along Broadway north of the Midtown Specific Plan, as well as the commercial and retail area south of the West Santa Ana Boulevard focus area.

7. Alternatives to the General Plan Update

Table 7-5 Reduced Intensity Alternative vs. Proposed GPU: Buildout Comparison

PLANNING AREA	Proposed General Plan Update			Reduced Intensity Alternative			Difference		
	Housing Units	Bldg. Sq. Ft. ³	Jobs	Housing Units	Bldg. Sq. Ft. ¹	Jobs	Housing Units	Bldg. Sq. Ft. ¹	Jobs
FOCUS AREAS	23,955	15,684,285	35,044	18,572	11,474,939	25,860	-5,383	-4,209,347	-9,184
55 Freeway/Dyer Road	9,952	6,142,283	13,302	6,220	3,838,927	8,987	-3,732	-2,303,356	-4,315
Grand Avenue/17th Street	2,283	703,894	1,622	2,283	703,894	1,622	0	0	0
South Bristol Street	5,492	5,082,641	11,192	3,841	3,176,651	6,323	-1,651	-1,905,990	-4,869
South Main Street	2,308	946,662	2,151	2,308	946,662	2,151	0	0	0
West Santa Ana Boulevard	3,920	2,808,805	6,777	3,920	2,808,805	6,777	0	0	0
SPECIFIC PLAN / SPECIAL ZONING	20,524	16,958,445	39,702	20,524	16,958,445	39,702	0	0	0
Adaptive Reuse Overlay Zone ²	1,260	976,935	2,567	1,260	976,935	2,567	0	0	0
Bristol Street Corridor Specific Plan	135	143,139	282	135	143,139	282	0	0	0
Harbor Mixed Use Transit Corridor Specific Plan	4,622	1,967,982	1,578	4,622	1,967,982	1,578	0	0	0
MainPlace Specific Plan	1,900	2,426,923	5,380	1,900	2,426,923	5,380	0	0	0
Metro East Mixed-Use Overlay Zone	5,551	4,685,947	12,258	5,551	4,685,947	12,258	0	0	0
Midtown Specific Plan	607	1,818,253	4,615	607	1,818,253	4,615	0	0	0
Transit Zoning Code	6,449	4,939,266	13,022	6,449	4,939,266	13,022	0	0	0
ALL OTHER AREAS OF THE CITY³	70,574	40,325,086	95,670	70,574	40,325,086	95,670	0	0	0
CITYWIDE TOTAL	115,053	72,967,816	170,416	109,670	68,758,470	161,232	-5,383	-4,209,347	-9,184

Source: Santa Ana 2020.

¹ Only includes nonresidential building square footage.

² The figures shown on the row for the Adaptive Reuse Overlay represents parcels that are exclusively in the Adaptive Reuse Overlay boundary. Figures for parcels that are within the boundaries of both the Adaptive Reuse Overlay Zone and a specific plan, other special zoning, or focus area boundary are accounted for in the respective specific plan, other special zoning, or focus area.

³ The City has included an assumption for growth on a small portion (5 percent) of residential parcels through the construction of second units, which is distributed throughout the city and is not concentrated in a subset of neighborhoods. Additional growth includes known projects in the pipeline and an increase of 10 percent in building square footage and employment for the professional office surrounding the Orange County Global Medical Center and along Broadway north of the Midtown Specific Plan, as well as the commercial and retail area south of the West Santa Ana Boulevard focus area.

7. Alternatives to the General Plan Update

Table 7-6 2020 RTP Population/Housing Consistency Alternative vs. Proposed GPU: Buildout Comparison

PLANNING AREA	Proposed General Plan Update			2020 RTP Consistency Alternative			Difference		
	Housing Units	Bldg. Sq. Ft. ³	Jobs	Housing Units	Bldg. Sq. Ft. ¹	Jobs	Housing Units	Bldg. Sq. Ft. ¹	Jobs
FOCUS AREAS	23,955	15,684,285	35,044	6,380	13,421,155	28,428	-17,575	-2,263,130	-6,616
55 Freeway/Dyer Road	9,952	6,142,283	13,302	1,221	5,666,453	8,898	-8,731	-475,830	-4,404
Grand Avenue/17th Street	2,283	703,894	1,622	561	1,400,741	3,568	-1,722	-696,847	-1,946
South Bristol Street	5,492	5,082,641	11,192	220	1,577,511	3,337	-5,272	-3,505,130	-7,855
South Main Street	2,308	946,662	2,151	1,720	1,685,978	3,455	-588	739,316	1,304
West Santa Ana Boulevard	3,920	2,808,805	6,777	2,658	3,090,472	9,170	-1,262	281,667	2,393
SPECIFIC PLAN / SPECIAL ZONING	20,524	16,958,445	39,702	6,584	17,495,238	48,447	-13,940	536,793	8,745
Adaptive Reuse Overlay Zone ²	1,260	976,935	2,567	260	976,935	3,043	-1,000	0	476
Bristol Street Corridor Specific Plan	135	143,139	282	135	143,139	282	0	0	0
Harbor Mixed Use Transit Corridor Specific Plan	4,622	1,967,982	1,578	1,324	1,944,731	3,615	-3,298	-23,251	2,037
MainPlace Specific Plan	1,900	2,426,923	5,380	1,900	2,426,923	5,380	0	0	0
Metro East Mixed-Use Overlay Zone	5,551	4,685,947	12,258	844	3,094,749	9,255	-4,707	-1,591,198	-3,003
Midtown Specific Plan	607	1,818,253	4,615	607	1,885,065	4,824	0	66,812	209
Transit Zoning Code	6,449	4,939,266	13,022	1,514	7,023,697	22,048	-4,935	2,084,431	9,026
ALL OTHER AREAS OF THE CITY³	70,574	40,325,086	95,670	70,574	40,325,086	95,670	0	0	0
CITYWIDE TOTAL	115,053	72,967,816	170,416	83,538	71,241,479	172,545	-31,515	-1,726,337	2,129

Source: Santa Ana 2020.

¹ Only includes nonresidential building square footage.

² The figures shown on the row for the Adaptive Reuse Overlay represents parcels that are exclusively in the Adaptive Reuse Overlay boundary. Figures for parcels that are within the boundaries of both the Adaptive Reuse Overlay Zone and a specific plan, other special zoning, or focus area boundary are accounted for in the respective specific plan, other special zoning, or focus area.

³ The City has included an assumption for growth on a small portion (5 percent) of residential parcels through the construction of second units, which is distributed throughout the city and is not concentrated in a subset of neighborhoods. Additional growth includes known projects in the pipeline and an increase of 10 percent in building square footage and employment for the professional office surrounding the Orange County Global Medical Center and along Broadway north of the Midtown Specific Plan, as well as the commercial and retail area south of the West Santa Ana Boulevard focus area.

7. Alternatives to the General Plan Update

Table 7-7 Reduced Park Demand Alternative vs. Proposed GPU: Buildout Comparison

PLANNING AREA	Proposed Project			Alternative Reduced Park Demand Alternative			Difference		
	Housing Units	Bldg. Sq. Ft. ³	Jobs	Housing Units	Bldg. Sq. Ft. ¹	Jobs	Housing Units	Bldg. Sq. Ft. ¹	Jobs
FOCUS AREAS	23,955	15,684,285	35,044	12,729	11,911,102	29,110	-11,226	-2,773,184	-5,934
55 Freeway/Dyer Road	9,952	6,142,283	13,302	4,571	3,838,927	8,987	-5,381	-2,303,356	-4,315
Grand Avenue/17th Street	2,283	703,894	1,622	561	1,400,741	3,568	-1,722	696,847	1,946
South Bristol Street	5,492	5,082,641	11,192	3,219	3,176,651	6,323	-2,273	-1,905,990	-4,869
South Main Street	2,308	946,662	2,151	1,720	1,685,978	3,455	-588	739,316	1,304
West Santa Ana Boulevard	3,920	2,808,805	6,777	2,658	2,808,805	6,777	-1,262	0	0
SPECIFIC PLAN / SPECIAL ZONING	20,524	16,958,445	39,702	20,524	16,958,445	39,702	0	0	0
Adaptive Reuse Overlay Zone ²	1,260	976,935	2,567	1,260	976,935	2,567	0	0	0
Bristol Street Corridor Specific Plan	135	143,139	282	135	143,139	282	0	0	0
Harbor Corridor Specific Plan	4,622	1,967,982	1,578	4,622	1,967,982	1,578	0	0	0
Main Place Specific Plan	1,900	2,426,923	5,380	1,900	2,426,923	5,380	0	0	0
Metro East Overlay Zone	5,551	4,685,947	12,258	5,551	4,685,947	12,258	0	0	0
Midtown Specific Plan	607	1,818,253	4,615	607	1,818,253	4,615	0	0	0
Transit Zoning Code	6,449	4,939,266	13,022	6,449	4,939,266	13,022	0	0	0
ALL OTHER AREAS OF THE CITY ³	70,574	40,325,086	95,670	70,574	40,325,086	95,670	0	0	0
CITYWIDE TOTAL	115,053	72,967,816	170,416	103,828	70,194,633	164,482	-11,226	-2,773,184	-5,934

Source: City of Santa Ana, 2020.

1. Only includes nonresidential building square footage.

2. The figures shown on the row for the Adaptive Reuse Overlay represents parcels that are exclusively in the Adaptive Reuse Overlay boundary. Figures for parcels that are within the boundaries of both the Adaptive Reuse Overlay Zone and a specific plan, other special zoning, or focus area boundary are accounted for in the respective specific plan, other special zoning, or focus area.

3. The City has included an assumption for growth on a small portion (5 percent) of residential parcels through the construction of second units, which is distributed throughout the city and is not concentrated in a subset of neighborhoods. Additional growth includes known projects in the pipeline and an increase of 10 percent in building square footage and employment for the professional office surrounding the Orange County Global Medical Center and along Broadway north of the Midtown Specific Plan, as well as the commercial and retail area south of the West Santa Ana Boulevard focus area.

7. Alternatives to the General Plan Update

7.3.2 Environmental Impact Comparison

Table 7-8, *Environmental Impact Comparison: Project Alternatives*, assesses the relative impact for each project alternative in comparison to the GPU. All of the environmental categories evaluated for the GPU in the updated Draft PEIR are compared. A determination is provided whether the impact is “less than” (LT), “greater than” (GT), or “similar to” (S) the respective environmental impact for the GPU. The table also provides a notation if an alternative is expected to eliminate a significant impact of the proposed project (reduce its severity to less than significant).

7. Alternatives to the General Plan Update

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7. Alternatives to the General Plan Update

Table 7-8 Environmental Impact Comparison

Impact	No Project/Current General Plan Alternative	Reduced Intensity Alternative	2020 RTP/SCS Consistency Alternative	Reduced Park Demand Alternative
Aesthetics	<p>Under this alternative, fewer housing units and more nonresidential square footage would be developed in the focus areas compared to the GPU. Land use designations and ultimate buildout outside of the focus areas would be the same as for the GPU. Overall, within the focus areas, the No Project alternative would be characterized by lower density and a reduced visual scale in comparison to the GPU. A discussion of the maximum densities and heights each of the five focus areas is provided below:</p> <ul style="list-style-type: none"> • Grand Avenue/17th Street. The current General Plan allows density up to 1.0 FAR in General Commercial and Professional and Administrative Office designations (and up to 1.15 FAR is allowed in the <i>Orange County Register</i> site) and 7 du/acre in Low Density Residential designation and heights generally up to 35 feet above grade (not taking into account Specific Development districts within the focus area). • 55 Freeway/Dyer Road. The current General Plan allows density up to 1.7 FAR in District Center designation and heights generally up to 35 feet above grade (not taking into account Specific Development districts within the focus area). • South Bristol Street. The current General Plan allows density up to 1.0 FAR in District Center and General Commercial designations and 15 du/acre in Medium Density Residential and heights generally up to 35 feet above grade (not taking into account Specific Development districts within the focus area). • South Main Street. The current General Plan allows density up to 1.0 FAR in the District Center and General Commercial designations and 7 du/acre in Low Density Residential designation and heights generally up to 35 feet above grade (not taking into account Specific Development districts and within the focus area). • West Santa Ana Boulevard. The current General Plan allows density up to 1.5 FAR in the Urban Neighborhood designation and 15 du/acre in the Medium Density Residential designation and heights generally up to 35 feet above grade (not taking into account Specific Development districts within the focus area). <p>The GPU introduces new policies that would protect neighborhood character and landmarks as well as enhance new public spaces. In comparison to the current General Plan, the updated Circulation-Mobility Element in the GPU reclassifies several arterials to provide new pedestrian and bikeway improvements. These improvements, along with implementing required design guidelines, are expected to enhance the livability and character of several communities. Since this alternative would reduce building intensity and heights in the focus areas, it would be anticipated to reduce light and glare impacts. Overall, aesthetic impacts for the No Project alternative would be considered less than aesthetic impacts for the GPU.</p> <p style="text-align: center;">LT</p>	<p>In comparison to the proposed GPU, this alternative would only modify land uses within the 55 Freeway/Dyer Road and South Bristol Street focus areas. Housing units and nonresidential building space would both be reduced by approximately 30 to 35 percent relative to the GPU land uses for these two focus areas. Design guidelines and amenity requirements would be assumed not to change in comparison to the GPU. Similarly, the Circulation-Mobility Element and associated roadway classification, bike, pedestrian, and mass transit improvements and policies would be the same as for the GPU. The visual impact of this alternative, therefore, would be limited to two focus areas and would be expected to reduce both the overall footprint of development and building heights within these two areas (by approximately 30 percent relative to the GPU). Light and glare impact within the 55 Freeway/Dyer and South Bristol Street focus areas could also be expected to be reduced to some degree. Overall, however, the aesthetics impacts citywide would be similar to the proposed GPU.</p> <p style="text-align: center;">S</p>	<p>Overall, this alternative would substantially reduce development capacity, particularly for housing, relative to the proposed GPU. Citywide it would result in a 73 percent reduction in housing units at buildout and an approximately 14 percent reduction in nonresidential building space. As shown in Table 7-6, this alternative assumes that densities would be reduced throughout the city, including previously approved Specific Plan and Special Districts. Development intensity would be reduced in all the focus areas as well, resulting in a 27 percent reduction in allowed housing units in the focus areas and an approximately 2.5 percent reduction in nonresidential uses. In comparison to the GPU, this alternative—and visual character—would be much less residential. Approximately 17,500 fewer housing units would be built in the combined focus areas in comparison to the GPU. The approximately 6,300 new units that would be accommodated would be expected to be in lower profile buildings. The change in nonresidential space would not be as great, but would be substantially different for some areas in comparison to the GPU. Approximately 3.5 MSF less would be accommodated within the South Bristol Street focus area. This would limit the vision for this area as a new District Center and Urban Neighborhood. This alternative, however, would increase building square footage in the South Main Street and West Santa Ana Boulevard focus areas. Therefore, impacts to visual appearance would be reduced compared to the GPU.</p> <p>It is difficult to categorize the relative aesthetic impact of this alternative in comparison to the GPU. Development would be substantially reduced but also very different. It would dramatically reduce residential units citywide (by 31,515 units) in comparison to the GPU and decrease nonresidential space (approximately 2.26 MSF citywide) in comparison to the GPU. The limited new development in focus areas (and in comparison to the current General Plan) would limit opportunities and available funding to support some major amenities that would benefit aesthetics. Overall, for purposes of the Draft PEIR, the relative impact of this alternative has been determined to be similar. In reality, the character would be substantially different and not necessarily result in an impact less or greater than the proposed GPU.</p> <p style="text-align: center;">S</p>	<p>In comparison to the proposed GPU, this alternative would result in lower density development and a reduced residential scale. Changes relative to the proposed GPU would only occur in the focus areas. Residential development within three focus areas would be limited to existing conditions; therefore, aesthetic impacts in these communities (Grand Avenue/17th Street, South Main Street, and West Santa Ana Boulevard) would differ from the proposed project. Although fewer related aesthetic improvements could be anticipated, overall GPU policies related to aesthetics would still apply to these areas. Design guidelines and amenity requirements would be assumed not to change in comparison to the GPU. Similarly, the Circulation-Mobility Element and associated roadway classification, bike, pedestrian, and mass transit improvements and policies would be the same as for the GPU. Overall, the aesthetics impacts citywide would be similar to the proposed GPU.</p> <p style="text-align: center;">S</p>
Agriculture Resources	<p>The City is a highly urbanized area with its entire area nearly built out. Furthermore, according to the California Resource Agency's Department of Conservation, the City does not have any significant agricultural resources. Therefore, no impacts to farmland would occur under the proposed project and no further analysis is required in the PEIR. The city has land designated or zoned for agricultural use but these lands constitute a very small percentage of the area of Santa Ana and are mainly in the outskirts of the city in the north and northeast and outside the focus areas. Furthermore, the city does not have any land designated or zoned for forestland, timberland, or timberland production. There would be no impacts from this alternative on agriculture, similar to the GPU.</p> <p style="text-align: center;">S</p>	<p>This alternative, similar to the No Project/Current General Plan alternative and the GPU, would have less than significant impacts to agricultural resources.</p> <p style="text-align: center;">S</p>	<p>This alternative, similar to the No Project/Current General Plan alternative and the GPU, would have less than significant impacts to agricultural resources.</p> <p style="text-align: center;">S</p>	<p>This alternative, similar to the No Project/Current General Plan alternative and the GPU, would have less than significant impacts to agricultural resources.</p> <p style="text-align: center;">S</p>

7. Alternatives to the General Plan Update

Table 7-8 Environmental Impact Comparison

Impact	No Project/Current General Plan Alternative	Reduced Intensity Alternative	2020 RTP/SCS Consistency Alternative	Reduced Park Demand Alternative
Air Quality	<p>In comparison to the GPU, the No Project alternative is characterized by 1) more employment and 2) less housing development in the city.</p> <ul style="list-style-type: none"> The current General Plan is the basis for the SCAG growth model and therefore would not exceed the SCAG forecasts; however, as with the GPU, the substantial growth projected at buildout would exceed South Coast AQMD's AQMP regional significance thresholds, resulting in a significant, unavoidable impact. Due to a substantial increase in employment (approximately 12,000 more in comparison to GPU buildout) as well as more dispersed housing in comparison to the proposed GPU, this alternative may increase vehicle miles traveled and related traffic air quality emissions. However, the GPU has policies that would encourage mixed use and infill development near focus areas and major travel corridors and would ultimately reduce VMT in the city. Housing growth and a larger nonresidential building footprint could also result in exposing a greater number of sensitive receptors to pollutants concentrations from construction activity and other sources. The land uses that have the potential to create objectionable odors would remain the same, causing a similar impact as existing conditions. <p style="text-align: center;">GT</p>	<p>This alternative would reduce housing development and nonresidential development projects within two focus areas of the city, resulting in fewer residents (by approximately 4 percent) and employees (by approximately 5.5 percent) compared to the GPU.</p> <ul style="list-style-type: none"> Decreasing the residential and nonresidential development footprint would decrease pollutants produced during construction and would decrease the amount of energy used in homes and businesses. This alternative would reduce vehicle miles traveled and related traffic air quality emissions. Decreased development footprint in the city may reduce exposure of sensitive receptors to pollutant concentrations. The land uses that have the potential to create objectionable odors would remain the same, causing a similar impact as existing conditions. <p>Although this alternative reduces impacts, the reduction would not eliminate a significant impact of the GPU.</p> <p style="text-align: center;">LT (impact would remain significant)</p>	<p>This alternative would limit new development in the city to reflect consistency with the 2020 RTP/SCS projections. It would substantially reduce housing units and population and moderately increase nonresidential uses and employees.</p> <ul style="list-style-type: none"> Decreasing the residential development footprint would decrease pollutants produced during construction and would decrease the amount of energy used in homes. Fewer people living in the city would generate fewer vehicle trips and reduce transportation emissions, reducing air quality impacts. The land uses that have the potential to create objectionable odors would remain the same, causing a similar impact as existing conditions. <p>Although this alternative would reduce Air Quality impacts, it would not eliminate a significant impact of the GPU.</p> <p style="text-align: center;">LT (impact, however, would remain significant)</p>	<p>This alternative would reduce housing development and nonresidential development projects within the five focus areas of the city, resulting in fewer residents (by approximately 10 percent) and employees (by approximately 3 percent) compared to the GPU.</p> <ul style="list-style-type: none"> Decreasing the residential and nonresidential development footprint would decrease pollutants produced during construction and would decrease the amount of energy used in homes and businesses. This alternative would reduce vehicle miles traveled and related traffic air quality emissions. Decreased development footprint in the city may reduce exposure of sensitive receptors to pollutant concentrations. The land uses that have the potential to create objectionable odors would remain the same, causing a similar impact as existing conditions. <p>Although this alternative reduces impacts, it would not eliminate a significant impact of the GPU.</p> <p style="text-align: center;">LT (impact would remain significant)</p>
Biological Resources	<p>In comparison to the GPU, the No Project alternative would be similarly characterized by infill development in a relatively built-out city. Whereas the GPU includes the development of more housing units, the No Project alternative includes more nonresidential square footage, and housing units are less densely developed and occupy larger lots. Therefore, it is anticipated that the resulting disturbance of land and biological resources would be similar. Furthermore, the open space and park areas would remain under the No Project alternative as well as the GPU. Therefore, impacts to biological resources would be similar.</p> <p style="text-align: center;">S</p>	<p>This alternative reduces housing units and nonresidential square footage in the 55 Freeway/Dyer Road and South Bristol Street focus areas. All other assumptions remain the same. The reduced development in two focus areas could result in a reduction of land disturbance, but alternatively, could result in lower profile development with larger building footprints. Overall disturbance would likely be similar to the proposed GPU. Moreover, the two subject focus areas are not characterized by native vegetation or sensitive habitat or species. The impact to biological resources would be similar to the proposed GPU.</p> <p style="text-align: center;">S</p>	<p>This alternative would substantially reduce housing development in the city and moderately reduce nonresidential development. As with the proposed GPU, sensitive resources (such as Santiago Creek) would be protected. The reduction in land development and related land disturbance, however, could be expected to reduce the potential to impact biological resources.</p> <p style="text-align: center;">LT</p>	<p>This alternative would not permit any increase in housing units within three of the five focus areas, reducing housing by 11,226 compared to the proposed GPU. It would also reduce nonresidential square footage by approximately 2.8 MSF. As with the proposed GPU, sensitive resources (such as Santiago Creek) would be protected. The reduction in land development and related land disturbance, however, could be expected to reduce the potential to impact biological resources.</p> <p style="text-align: center;">LT</p>
Cultural Resources	<p>In comparison to the GPU, the No Project alternative would result in a moderate increase to nonresidential building square footage and fewer housing units. With the exception of focus areas, however, land use designations and development potential would be the same as for the GPU. The potential to impact archaeological resources would be similar. As with the GPU, cultural resource impacts to historical resources would remain significant and unavoidable even with the implementation of the 1997 GP Land Use Element EIR mitigation measures.</p> <p style="text-align: center;">S</p>	<p>This alternative would result in less growth in the 55 Freeway/Dyer Road and South Bristol Street focus areas with all other assumptions remaining the same. Therefore, this alternative would have a slightly less impact on land disturbance and subsequently on cultural resources.</p> <p style="text-align: center;">LT (potential impact to historical resources, however, would remain significant)</p>	<p>The substantial reduction in development under the RTP/SCS alternative would reduce land disturbance and be expected to reduce the potential to impact cultural resources, including archaeological and historical resources. Potential impacts to historical resource, however, would remain significant.</p> <p style="text-align: center;">LT (potential impact to historical resources, however, would remain significant)</p>	<p>This alternative would limit housing development to existing conditions in the Grand Avenue/17th Street, South Main Street, and West Santa Ana Boulevard focus areas, and would also reduce housing density in the South Bristol and 55 Freeway/Dyer Road focus areas. Development potential for nonresidential square footage would also be minimally reduced. Therefore, it could be expected to reduce land development and potential disturbance to historical and archaeological resources.</p> <p style="text-align: center;">LT (potential impact to historical resources, however, would remain significant)</p>
Energy	<p>This alternative would result in an increase of approximately 2.6 MSF of nonresidential building square feet (approximately 3.5 percent increase in comparison to GPU) and a substantial reduction in allowable residential units compared to the GPU (13,195 fewer units). This alternative would reduce housing energy use and increase nonresidential building use in comparison to the GPU. It may reduce vehicle miles traveled and related fuel use. The No Project alternative would not include GPU policies to support the state's transition to a carbon-neutral economy. Overall, this alternative would increase energy in some areas and decrease other energy needs. Overall, energy impacts would be considered similar to the GPU.</p> <p style="text-align: center;">S</p>	<p>This alternative reduces new housing development and other nonresidential development in two focus areas: 55 Freeway /Dyer Road and South Bristol Street. This alternative would therefore reduce housing and nonresidential building energy use. Additionally, this alternative may decrease vehicle miles traveled and related fuel use. Overall this alternative would decrease energy impacts relative to the GPU, and as with the GPU, would be less than significant.</p> <p style="text-align: center;">LT</p>	<p>This alternative limits new development in the city to reflect consistency with the 2020 RTP/SCS projections. This alternative would result in a substantial reduction in residential units and a slight increase in nonresidential building square footage in the city. As a result, this alternative would reduce vehicle miles traveled and related energy use. This alternative would decrease energy use compared to the GPU, and as with the GPU, would be less than significant.</p> <p style="text-align: center;">LT</p>	<p>This alternative reduces new housing development and other nonresidential development. This alternative would therefore reduce housing and nonresidential building energy use. Additionally, this alternative may decrease vehicle miles traveled and related fuel use. Overall, this alternative would decrease energy impacts relative to the GPU, and as with the GPU, would be less than significant.</p> <p style="text-align: center;">LT</p>

7. Alternatives to the General Plan Update

Table 7-8 Environmental Impact Comparison

Impact	No Project/Current General Plan Alternative	Reduced Intensity Alternative	2020 RTP/SCS Consistency Alternative	Reduced Park Demand Alternative
Geology and Soils	<p>Similar to the GPU, the No Project alternative would be characterized by infill development in a relatively built-out city. In comparison to the GPU, the No Project alternative would result in a moderate increase in nonresidential building square footage and fewer housing units. With the exception of focus areas, however, land use designations and development potential would be the same as for the GPU. Whereas the GPU includes the development of more housing, the No Project alternative includes more nonresidential square footage and housing units that are less densely developed and occupy larger lots. Therefore, it is anticipated that the resulting disturbance of land would be similar. Exposure of new development to geological and soils hazards, including seismic shaking, landslides, erosion, liquefaction, and land subsidence, would be similar to the GPU. And as with the GPU, geotechnical and soils hazards would be mitigated to less than significant with implementation of existing regulatory measures, including compliance with the California Building Codes and National Pollutant Discharge Elimination System (NPDES) requirements and best management practices. Furthermore, as with the GPU, paleontological resource impacts would be mitigated to less than significant per the adopted mitigation in the 1997 GP Land Use Element EIR.</p> <p style="text-align: center;">S</p>	<p>This alternative reduces new housing development and other nonresidential development in two focus areas: 55 Freeway /Dyer Road and South Bristol Street. It would be expected to reduce potential geotechnical hazards associated with development in these focus areas and also expose fewer residents and employees. As with the GPU, this alternative would comply with the same regulations summarized under the No Project/Current General Plan alternative. Impacts would be slightly less than the GPU.</p> <p style="text-align: center;">LT</p>	<p>The substantial reduction in development potential under the RTP/SCS alternative would reduce land disturbance and related, potential geotechnical hazards. Fewer residents and employees would be exposed to geotechnical and soils hazards. As with the GPU, this alternative would comply with the same regulations summarized under the No Project/Current General Plan alternative. Impacts would be slightly less than the GPU.</p> <p style="text-align: center;">LT</p>	<p>This alternative reduces new housing development and other nonresidential development in all of the five focus areas. It would be expected to reduce potential geotechnical hazards associated with development in these focus areas and also expose fewer residents and employees. As with the GPU, this alternative would comply with the same regulations summarized under the No Project/Current General Plan alternative. Impacts would be slightly less than the GPU.</p> <p style="text-align: center;">LT</p>
Greenhouse Gas Emissions	<p>Development in the city would comply with existing GHG regulations, CARB's Scoping Plan, and the City's Climate Action Plan adopted in December 2015. The increase in employment as well as more dispersed housing in comparison to the GPU would increase vehicle miles traveled and related GHG emissions in comparison to the GPU. This alternative, however, reduces the total housing units by approximately 13,000 units, which would reduce GHG emissions. In comparison to the No Project alternative, however, the GPU has policies that would encourage mixed use and infill development near focus areas and major travel corridors and would ultimately reduce VMT in the city. Overall GHG emissions would likely be greater under the No Project alternative and, as with the proposed project, would be significant and unavoidable.</p> <p style="text-align: center;">GT</p>	<p>This alternative reduces new housing development and other nonresidential development in two focus areas: 55 Freeway /Dyer Road and South Bristol Street. It would result in fewer residents and employees in comparison to the GPU. This alternative would reduce VMT in comparison to the GPU as well as reduce GHG emissions generated by building energy use. Overall, this alternative would reduce GHG impacts relative to the GPU, but the GHG impact would remain significant and unavoidable.</p> <p style="text-align: center;">LT (impact would remain significant)</p>	<p>This alternative would limit new development in the City to reflect consistency with the 2020 RTP/SCS projections. It would substantially reduce housing units and population, and moderately increase nonresidential uses and employees. It would reduce VMT-generated GHG emissions as well as building energy emissions. It would decrease GHG emissions compared to the GPU, but the GHG impact would remain significant and unavoidable.</p> <p style="text-align: center;">LT (impact would remain significant)</p>	<p>This alternative reduces new housing development and other nonresidential development in the five focus areas. It would result in fewer residents and employees in comparison to the GPU. This alternative would reduce VMT in comparison to the GPU as well as reduce GHG emissions generated by building energy use. Overall, this alternative would reduce GHG impacts relative to the GPU, but the GHG impact would remain significant and unavoidable.</p> <p style="text-align: center;">LT (impact would remain significant)</p>
Hazards and Hazardous Materials	<p>As with the GPU, the transport, use, and storage of hazardous materials would be mitigated by comprehensive regulations. Similarly, airport-related safety hazards would be mitigated by compliance with regulations and the County's Airport Land Use Commission.</p> <p>The overall hazards impacts would therefore be similar to the GPU, and as with the GPU, would be less than significant.</p> <p style="text-align: center;">S</p>	<p>As with the GPU, the transport, use, and storage of hazardous materials would be mitigated by comprehensive regulations. Similarly, airport-related safety hazards would be mitigated by compliance with regulations and the County's Airport Land Use Commission.</p> <p>The overall hazards impacts would therefore be similar to the GPU, and as with the GPU, would be less than significant.</p> <p style="text-align: center;">S</p>	<p>As with the GPU, the transport, use, and storage of hazardous materials would be mitigated by comprehensive regulations. Similarly, airport-related safety hazards would be mitigated by compliance with regulations and the County's Airport Land Use Commission.</p> <p>The overall hazards impacts would therefore be similar to the GPU, and as with the GPU, would be less than significant.</p> <p style="text-align: center;">S</p>	<p>As with the GPU, the transport, use, and storage of hazardous materials would be mitigated by comprehensive regulations. Similarly, airport-related safety hazards would be mitigated by compliance with regulations and the County's Airport Land Use Commission.</p> <p>The overall hazards impacts would therefore be similar to the GPU, and as with the GPU, would be less than significant.</p> <p style="text-align: center;">S</p>

7. Alternatives to the General Plan Update

Table 7-8 Environmental Impact Comparison

Impact	No Project/Current General Plan Alternative	Reduced Intensity Alternative	2020 RTP/SCS Consistency Alternative	Reduced Park Demand Alternative
Hydrology and Water Quality	<p>In comparison to the GPU, the No Project alternative would be similarly characterized by infill development in a relatively built-out city. Therefore, impacts to hydrology and water quality would be minimal. Furthermore, the open space and park areas would remain under the No Project alternative.</p> <p>As with the GPU, development under the current General Plan would be subject to the myriad of regulations that control potential flooding and water quality impacts. These include NPDES, which regulates discharges into waters of the United States and mandates MS4 permits (regulating municipal storm sewer systems) and Storm Water Pollution Prevention Plans (SWPPPs) requiring implementation of best management practices for potential surface water and water quality impacts related to project construction. Additionally, the No Project alternative would be subject to flood hazard development reviews in compliance with Chapter 7 (Floodplain Management Regulations) of the City's municipal code. Hydrology impacts, therefore, would be similar to the GPU.</p> <p style="text-align: center;">S</p>	<p>The reduced intensity alternative is a reduced version of the GPU. It would reduce new housing development and other nonresidential development in two focus areas: 55 Freeway/Dyer Road and South Bristol Street. These areas are already developed, and decreasing the intensity of development in these areas would not be expected to measurably alter pervious areas and related stormwater runoff. As with the GPU, this alternative would comply with the same regulations summarized under the No Project alternative. Impacts would be similar to the GPU.</p> <p style="text-align: center;">S</p>	<p>The substantial reduction in development potential under the RTP/SCS alternative would reduce land disturbance and potentially preserve more existing pervious land area, thereby decreasing stormwater flows relative to the GPU. This reduction, however, would likely be minimal and not change the overall level of the hydrology and water quality impact in comparison to the GPU. The 2020 RTP Consistency alternative would comply with the regulations as summarized under the No Project alternative. These regulations would mitigate the hydrology and water quality impact to less than significant. Impacts would be similar to the GPU.</p> <p style="text-align: center;">S</p>	<p>This alternative is a reduced version of the GPU and would result in fewer residents and employees in comparison to the GPU. These focus areas are already developed, and decreasing the intensity of development in these areas would not be expected to measurably alter pervious areas and related stormwater runoff. As with the GPU, this alternative would comply with the same regulations summarized under the No Project alternative. Impacts would be similar to the GPU.</p> <p style="text-align: center;">S</p>
Land Use and Planning	<p>As with the GPU, the No Project alternative would not divide established communities and would comply with the Airport Environs Land Use Plan (AELUP). The No Project alternative, however, lacks policies (and related land use changes) that promote the goals of SCAG's 2020-2045 RTP/SCS, such as:</p> <ul style="list-style-type: none"> • Encouraging the development of diverse housing types in areas that are supported by multiple transportation options. • Supporting healthy and equitable communities. • Increasing person and goods movement and travel choices within the transportation system. • Reducing greenhouse gas emissions and improving air quality. • Adapting to a changing climate and supporting an integrated regional development pattern and transportation network. <p>The GPU evolved to concentrate development in new areas to take advantage of mass transit and provide for mixed-use opportunities. Furthermore, the updated circulation circulation <u>mobility</u> element aims at creating complete streets across the city to promote multimodal transportation and decrease VMT. Therefore, the No Project alternative would have a greater impact on land use and planning.</p> <p style="text-align: center;">GT</p>	<p>As with the GPU, the Reduced Intensity alternative would not divide established communities and would comply with the Airport Environs Land Use Plan (AELUP). This alternative reduces new housing development and other nonresidential development in two focus areas: 55 Freeway /Dyer Road and South Bristol Street. Under the GPU, these focus areas were designed to introduce higher intensity urban development and take advantage of their locations relative to mass transit improvements and service and existing opportunities to integrate and expand other major activity areas (South Coast Metro). The substantial reduction in opportunities for these areas would not as effectively meet the City's land use objectives of the regional RTP/SCS goals. Overall, this alternative would increase land use and planning impacts.</p> <p style="text-align: center;">GT</p>	<p>As with the GPU, the 2020 RTP/SCS Consistency alternative would not divide established communities and would comply with the Airport Environs Land Use Plan (AELUP). Although developed to be consistent with the RTP/SCS population and housing projections (to eliminate the significant population impact of the GPU), this alternative would not be nearly as effective as the proposed GPU in achieving the regional RTP/SCS goals and objectives (as described under the No Project alternative). It would not provide the opportunities to optimize multimodal transportation and new mixed-use, urban communities. Overall, this alternative would increase land use and planning impacts.</p> <p style="text-align: center;">GT</p>	<p>As with the GPU, the Reduced Park Demand alternative would not divide established communities and would comply with the Airport Environs Land Use Plan (AELUP). This alternative reduces new housing development and other nonresidential development in the five focus areas. Under the GPU, these focus areas were designed to introduce higher intensity urban development and take advantage of their locations relative to mass transit improvements and service and existing opportunities to integrate and expand other major activity areas. The substantial reduction in opportunities for development in these areas would not as effectively meet the City's land use objectives or the regional RTP/SCS goals. Overall, this alternative would increase land use and planning impacts.</p> <p style="text-align: center;">GT</p>
Mineral Resources	<p>Given that the entire City does not have mineral resource sectors or active or inactive mines, implementation of the No Project alternative, similar to the GPU, would not cause a loss of availability of known mineral resources. Overall, the impact to mineral resources would be similar to the GPU and would be less than significant.</p> <p style="text-align: center;">S</p>	<p>This alternative, similar to the No Project/Current General Plan alternative and the GPU, would have less than significant impacts to mineral resources.</p> <p style="text-align: center;">S</p>	<p>This alternative, similar to the No Project/Current General Plan alternative and the GPU, would have less than significant impacts to mineral resources.</p> <p style="text-align: center;">S</p>	<p>This alternative, similar to the No Project/Current General Plan alternative and the GPU, would have less than significant impacts to mineral resources.</p> <p style="text-align: center;">S</p>

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Table 7-8 Environmental Impact Comparison

Impact	No Project/Current General Plan Alternative	Reduced Intensity Alternative	2020 RTP/SCS Consistency Alternative	Reduced Park Demand Alternative
Noise	The No Project alternative would result in a substantial increase in employment as well as more dispersed housing in comparison to the GPU. Approximately 13,000 fewer housing units would be constructed. Therefore, this alternative may increase vehicle miles traveled and related traffic noise impacts. The higher anticipated building square footage under the No Project alternative would result in more construction activity, but the construction activity would be more spread out. Construction-related noise is a highly localized impact, and the severity of impacts depends on the equipment used, distance to nearby sensitive receptors, time of day, and overall duration of construction. Impacts would be similar to the GPU. As with the GPU, both construction and traffic noise impacts would be significant and unavoidable. S	The reduction of both housing units and jobs would reduce construction noise and traffic-related impacts for the Reduced Intensity alternative. Although these impacts would be decreased, particularly in the 55 Freeway/Dyer Road and South Bristol Street focus areas, it is not anticipated that impacts would be reduced to less than significant, and these impacts would remain significant and unavoidable. LT (construction and traffic noise, however, would remain significant)	This alternative limits new development in the city to reflect consistency with the 2020 RTP/SCS projections. This alternative would result in a substantial reduction in residences and a slight increase in employees in the city, which would reduce both construction noise and traffic-related impacts. Due to a decrease in reduction in residential growth compared with the proposed GPU, construction and traffic-related impacts would be reduced. Relative to the proposed GPU, implementation of this alternative would likely remove significant traffic noise impacts along a few of the significantly impacted roadways. Although these impacts would be decreased, it is not anticipated that impacts could be reduced to less than significant, and these impacts would remain significant and unavoidable. LT (construction and traffic noise, however, would remain significant)	This alternative reduces residential growth by eliminating or reducing residential land uses and intensity in the five focus areas. Due to a reduction in residential growth compared with the proposed GPU, construction and traffic-related impacts would be reduced. Relative to the proposed GPU, implementation of this alternative would likely remove significant traffic noise impacts along a few of the significantly impacted roadways. However, overall, construction and traffic noise impacts along other roadway segments would remain significant and unavoidable. LT (construction and traffic noise, however, would remain significant)
Population and Housing	The No Project alternative would result in an 11 percent decrease in population at buildout in comparison to the GPU. However, like the GPU, the population and household projections for the No Project alternative exceed the Orange County regional council of governments (COG) and the 2020/2045 RTP/SCS projections and would result in a significant and unavoidable impact. LT (the population impact would remain significant)	The reduced intensity would reduce new housing development and other nonresidential development in two focus areas: 55 Freeway /Dyer Road and South Bristol Street. This alternative would reduce population by 5,383 persons and housing units by 19,825 units in comparison to the GPU. The resultant projections for population and housing in 2045 would still substantially exceed the Orange County COG and 2020/2045 RTP/SCS projections for the City. Therefore, population growth would be substantial and similar to the GPU and would be significant and unavoidable. LT (the population impact would remain significant)	This alternative reduces population growth in the city so that the 2045 population is less than the population projected by the Orange County COG and the 2020-2045 RTP/SCS. The Orange County COG projects a 2045 population of 360,077 for the city, and the 2020-2045 RTP/SCS projects a population of 360,100. Therefore, population and housing impacts associated with this alternative are less than the GPU. Additionally, this alternative reduces a significant and unavoidable impact to less than significant. LT (eliminates a significant and unavoidable impact)	This alternative's reduction in housing units would result in an approximate 10 percent population reduction in comparison to the GPU. The estimated buildout population of 389,518, however, would still exceed the 360,100 person population of the 2020-2045 RTP/SCS projection. Therefore, population growth would be substantial and population growth would remain a significant and unavoidable impact of this project alternative. LT (the population impact would remain significant)
Public Services	Relative to the GPU, the No Project alternative would result in an approximate 7 percent increase in employment opportunities and an 11 percent decrease in residents citywide. Since employment centers generate fewer calls for police and fire services than residential uses and do not directly generate increased school or library needs, public service impacts would be reduced under the No Project alternative relative to the GPU. LT	This alternative would reduce development capacity in the 55 Fwy/Dyer Road and South Bristol Street focus areas. The land use change would result in a 5,383 reduction in housing units and a population reduction of 19,825 citywide. Public service demands, therefore, would be reduced, although not substantially, relative to the proposed GPU. LT	In comparison to the GPU, this alternative would reduce population by 18 percent and would result in a very slight increase in employment (1 percent) citywide. Since employment centers generate fewer calls for police and fire services and do not directly generate increased school or library needs, this alternative would reduce service demands and overall impacts relative to the GPU. LT	This alternative would reduce residential development in the five focus areas and result in an overall reduction of 11,225 units in comparison to the proposed GPU. It would also reduce nonresidential commercial/industrial development by approximately 2.8 MSF. The reduced scale of this project alternative would reduce public service demands in comparison to the proposed GPU. As with the GPU, public service impacts would be less than significant. LT
Recreation	The No Project alternative would reduce the resident population by 11 percent compared to the GPU; this would reduce the demand for open space and recreational facilities relative to the GPU. Based on the City's standard, however, without creation of more park facilities, the increase in population would result in an approximately 250 202 -acre park deficit and a resultant 1.35 1.47 park acres per 1000 residents. Although less than the 346.41 299 -acre deficit upon implementation of the GPU, this impact would be significant. Moreover, under the No Project alternative, the myriad of policies and implementation actions developed for the GPU to address park shortages would not be approved. Overall, this impact is concluded to be similar to the proposed GPU. S (impact would remain significant and unavoidable)	This alternative would substantially reduce development within the 55 Freeway /Dyer Road and South Bristol Street focus area relative to the GPU. Combined, housing units within these two areas would be reduced by 5,383 units, resulting in an overall city population decrease of approximately 5 percent compared to the GPU. This alternative would particularly reduce recreation demand within the respective focus areas. The overall citywide park deficit would be approximately 306 260 acres (1.26 1.37 park acres per 1,000 residents) compared to 346.41 299 acres and 1.20 1.34 acres per 1,000 residents for the proposed GPU. Overall, the recreation impact would be reduced, but as with the proposed GPU would be significant and unavoidable. LT (impact would remain significant and unavoidable)	This alternative would reduce population by 18 percent and would result in a decrease in demand on existing parks and a decreased need for new parks compared to the GPU. The reduced housing units and related recreation facility demand would be distributed throughout all the focus areas and several of the Specific Plan areas under this alternative. Without new parks, this alternative would result in a 189 142 -acre park deficit with 1.46 1.60 park acres per 1,000 residents. Given the unavailability of land for park development, although this alternative would substantially reduce the impact on recreation relative to the proposed GPU, the impact would remain significant and unavoidable. LT (impact would remain significant and unavoidable)	As described in this chapter, this alternative was developed to reduce park demand. It would reduce population growth by approximately 10 percent in comparison to the proposed GPU, but would also avoid new residential development in the areas currently most underserved with park facilities. If no additional parks were created, at buildout, this alternative would result in a park deficit of 262 245 -acres and 1.33 1.45 acres per 1,000 residents, compared to 4.34 1.19 acres per 1,000 residents for the GPU. As with the proposed GPU, the numerous policies and implementation actions would serve to mitigate the park shortage, but there is no guarantee that the City's standard of 2.0 acres per 1,000 residents would be achieved. This impact would be reduced but would remain significant and unavoidable. LT (impact would remain significant and unavoidable)

7. Alternatives to the General Plan Update

Table 7-8 Environmental Impact Comparison

Impact	No Project/Current General Plan Alternative	Reduced Intensity Alternative	2020 RTP/SCS Consistency Alternative	Reduced Park Demand Alternative
Transportation and Traffic	<p>As detailed in the Traffic Impact Study, the vehicle miles traveled (VMT) for the 2045 No Project scenario for the city is 12,163,794 (with a VMT/SP of 22.8). The VMT for the city in 2045 with the implementation of the GPU is 1,518,959 (with a VMT/SP of 20.3). Several factors would result in a greater VMT impact for the No Project alternative in comparison to the GPU. The No Project alternative has more nonresidential square footage and lower density residential uses. In comparison, the GPU was developed to optimize multimodal transportation and introduces higher density residential and mixed-use land uses proximate to mass transit opportunities. In addition to land use changes, numerous new policies facilitate reduced auto trips and alternative transportation improvements. The VMT for the No Project alternative would increase impacts relative to the GPU. It would result in a VMT/SP of 22.8 compared to 20.3 for the GPU. Since 22.8 exceeds the significance threshold of 22.0 adopted by the City, it would result in a significant new impact.</p> <p style="text-align: center;">GT (introduces a new significant impact)</p>	<p>In comparison to the GPU, this alternative would reduce housing and nonresidential uses in the South Bristol Street and 55 Freeway/Dyer Road focus areas and result in a decrease in total VMT for the city in 2045. However, because the residential development proposed in the GPU for the South Bristol Street and 55 Freeway/Dyer Road focus areas would be in dense mixed-use districts that are also designated high-quality transit areas (HQTAs), it is anticipated that this alternative would result in a slightly higher VMT/SP compared to the GPU. It is expected that the VMT/SP for this alternative would still be lower than the No Project scenario.</p> <p style="text-align: center;">GT</p>	<p>Because this alternative would reduce population by approximately 18 percent and result in a slight increase in employment (1 percent) in comparison to the GPU, it would be expected to reduce total VMT. However, it would be expected to increase VMT/SP, the metric used to determine the significance of transportation impacts, when compared to the GPU. The reduction in housing units in mixed-use districts and HQTAs would be expected to increase the forecast VMT/SP for this alternative when compared to the GPU, thereby increasing transportation impacts. If the VMT/SP exceeded 20.3, it would introduce a new significant impact. Without extensive modeling, the actual VMT/SP that would result is unknown. It is expected that the VMT/SP for this alternative would be lower than for the No Project scenario.</p> <p style="text-align: center;">GT</p>	<p>This alternative would result in the elimination of increases to the forecast number of housing units in the Grand Avenue/17th Street, South Main Street, and West Santa Ana Boulevard focus areas. In addition, new residential units in the 55 Freeway/Dyer Road focus areas would be reduced by 5,381 units compared to the GPU (remaining total of 4,571 new units), and new units in the South Bristol Street focus area would be reduced by 2,273 units for a total of 3,220 new units at buildout. The reduction in housing units in these mixed-use and HQTA districts would be anticipated to reduce overall VMT, but would increase the VMT/SP forecast when compared to the GPU. This is because the additional units proposed as part of the GPU in these HQTAs have a much lower VMT/SP, helping to reduce the overall citywide average. It is expected that the VMT/SP for this alternative would nevertheless be lower than the No Project scenario.</p> <p style="text-align: center;">GT</p>
Tribal Cultural Resources	<p>In comparison to the GPU, the No Project alternative would be characterized by less dense residential development on larger lots and increased nonresidential square footage. However, the GPU introduces more housing units in the focus areas, resulting in similar land disturbance overall and thus a similar potential to impact tribal cultural resources. The 1997 GP Land Use Element EIR does not include a discussion of tribal cultural resources, but any development pursuant to the No Project alternative that would require a General Plan amendment would need to abide by the regulatory requirements of AB 52 and the cultural resources mitigation measures in the 1997 GP Land Use Element EIR. As with the GPU, tribal cultural resource impacts would be mitigated to less than significant.</p> <p style="text-align: center;">S</p>	<p>This alternative would result in less growth in the 55 Freeway/Dyer Road and South Bristol Street focus areas with all other assumptions remaining the same. Therefore, this alternative would have a slightly less impact on land disturbance and subsequently on tribal cultural resources.</p> <p style="text-align: center;">LT</p>	<p>This alternative includes a growth cap on development in the city compared to the GPU. Less development would mean less land disturbance and slightly decreased impacts to tribal cultural resources.</p> <p style="text-align: center;">LT</p>	<p>This alternative would result limit residential growth in 3 focus areas to existing conditions and reduce growth in the 55 Freeway/Dyer Road and South Bristol Street focus areas. It would also reduce non-residential development by approximately 2.8MSF. With all other assumptions remaining the same. Therefore, this alternative would have a slightly less impact on land disturbance and subsequently on tribal cultural resources</p> <p style="text-align: center;">LT</p>
Utilities and Service Systems	<p>Relative to the GPU, the No Project alternative would increase nonresidential square footage and decrease dwelling units citywide. Since residential use is associated with a higher water demand and higher sewage generation, the No Project alternative would result in an overall decrease of approximately 38 percent in demand for these services compared to the GPU.</p> <p>Additionally, the No Project alternative would generate 4.5 million pounds per day of solid waste at buildout, which is 43 percent more than the GPU, since nonresidential uses generate more solid waste than residential uses. This additional waste generation could still be accommodated by the existing landfills.</p> <p>Furthermore, this alternative would result in a minimal increase to electricity use and a 3 percent decrease in natural gas use compared to the GPU.</p> <p>Since the No Project alternative would decrease water demand, wastewater generation, and natural gas consumption and would increase solid waste generation, impacts of this alternative are less than the GPU.</p> <p style="text-align: center;">LT</p>	<p>This alternative would reduce population and jobs by approximately 5 percent in comparison to the GPU. It would therefore, reduce utility impacts, although not substantially, compared to the proposed GPU.</p> <p style="text-align: center;">LT</p>	<p>This alternative would reduce housing by 27 percent and nonresidential square footage by approximately 1 percent Therefore water demand, wastewater generation, solid waste generation, and electricity and natural gas demands would all be less for this alternative.</p> <p style="text-align: center;">LT</p>	<p>This alternative would reduce housing by 10 percent and nonresidential square footage by approximately 4 percent Therefore water demand, wastewater generation, solid waste generation, and electricity and natural gas demands would all be less for this alternative.</p> <p style="text-align: center;">LT</p>

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Impact	No Project/Current General Plan Alternative	Reduced Intensity Alternative	2020 RTP/SCS Consistency Alternative	Reduced Park Demand Alternative
Wildfire	<p>The nearest fire hazard severity zone to the city is about 3.8 miles away, at the southern tip of the Peters Canyon Regional Park. Therefore, the city is not in or near state responsibility areas or lands classified as very high fire hazard severity zones. Additionally, no area in the city is at the wildland-urban interface. Therefore, this alternative, like the GPU, would have no impacts.</p> <p style="text-align: center;">S</p>	<p>This alternative, similar to the No Project/Current General Plan alternative and the GPU, would have less than significant impacts from wildfires.</p> <p style="text-align: center;">S</p>	<p>This alternative, similar to the No Project/Current General Plan alternative and the GPU, would have less than significant impacts from wildfires.</p> <p style="text-align: center;">S</p>	<p>This alternative, similar to the No Project/Current General Plan alternative and the GPU, would have less than significant impacts from wildfires.</p> <p style="text-align: center;">S</p>

7. Alternatives to the General Plan Update

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7. Alternatives to the General Plan Update

7.3.3 Environmental Impact Conclusion

Table 7-9 summarizes the environmental impacts of each alternative compared to the proposed project.

Table 7-9 Summary of Proposed Project and Alternatives Impacts

Topic	General Plan Update	No Project/Existing General Plan	Reduced Intensity	2020 RTP/SCS Consistency	Reduced Park Demand Alternative
Aesthetics	LTS	-	=	=	=
Agricultural Resources	LTS	=	=	=	=
Air Quality	S/U	+	-	-	-
Biological Resources	LTS/M	=	=	-	-
Cultural Resources	S/U	=	-	-	-
Energy	LTS	=	-	-	-
Geology and Soils	LTS/M	=	-	-	-
Greenhouse Gas Emissions	S/U	+	-	-	-
Hazards and Hazardous Materials	LTS	=	=	=	=
Hydrology and Water Quality	LTS	=	=	=	=
Land Use and Planning	LTS	+	+	+	+
Mineral Resources	LTS	=	=	=	=
Noise	S/U	=	-	-	-
Population and Housing	S/U	-	-	-	-
Public Services	LTS	-	-	-	-
Recreation	LTS	-	-	-	-
Transportation	LTS	+	+	+	+
Tribal Cultural Resources	LTS/M	=	-	-	-
Utilities and Service Systems	LTS	-	-	-	-
Wildfire	LTS	=	=	=	=

Notes: LTS = Less than Significant; LTS/M = Less than Significant with Mitigation Incorporated; S/U = Significant and Unavoidable

(-) The alternative would result in less of an impact than the proposed project.

(+) The alternative would result in greater impacts than the proposed project.

(=) The alternative would result in the same/similar impacts as the proposed project.

No Project/Current General Plan Alternative. This alternative would result in similar impacts to 11 impact categories, reduced impacts to 5 environmental impacts, and increased impacts to 4 categories. Impacts would

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be similar for agricultural resources, biological resources, cultural resources, energy, geology and soils, hazards and hazardous materials, hydrology and water quality, mineral resources, noise, tribal cultural resources, and wildfire. This alternative would reduce impacts for aesthetics, population and housing, public services, recreation, and utilities and service systems. Impacts to air quality, greenhouse gas emissions, land use and planning, and transportation would increase. This alternative does not mitigate any of the significant and unavoidable impacts associated with the GPU to a less than significant impact. It would also exceed the City's VMT threshold. Overall, impacts under this alternative would decrease in comparison to the proposed project.

Reduced Intensity Alternative. This alternative would result in similar impacts to 7 impact categories, reduce impacts to 11 categories and increase impacts to two categories. Impacts would be similar for aesthetics, agricultural resources, biological resources, hazards and hazardous materials, hydrology and water quality, mineral resources, and wildfire. This alternative would decrease impacts to air quality, cultural resources, energy, geology and soils, greenhouse gas emissions, noise, population and housing, public services, recreation, tribal cultural resources, and utilities and services. It would be expected to increase 2 impacts; land use and planning impacts and transportation impacts relative to the GPU. As with the GPU, impacts to air quality, cultural resources, greenhouse gas emissions, noise, and population and housing would remain significant and unavoidable. Overall, impacts under this alternative would be decreased in comparison to the proposed project.

2020 RTP/SCS Consistency Alternative. This alternative would reduce impacts to 12 environmental impacts, result in similar impacts to 6 categories, and increase impacts to 1 category. It would reduce impacts to air quality, biological resources, cultural resources, energy, geology and soils, greenhouse gas emissions, noise, population and housing, public services, recreation, tribal cultural resources, and utilities and service systems. Impacts would be very similar for aesthetics, agricultural resources, hazards and hazardous materials, hydrology and water quality, mineral resources, and wildfire. It would increase impacts to land use and planning. It would also increase impacts to transportation and potentially introduce a new significant impact. It is anticipated, however, that under this alternative, transportation could be mitigated to less than significant. Under the GPU, transportation impacts are less than significant without mitigation. As with the GPU, impacts to air quality, cultural resources, greenhouse gas emissions, and noise would remain significant and unavoidable. The impact to population and housing would be reduced to less than significant. Overall, impacts under this alternative would be reduced in comparison to the proposed project.

Reduced Park Demand Alternative. This alternative would result in similar impacts to 6 impact categories, reduced impacts to 12 categories, and increased impacts to 2 categories. Impacts would be similar for aesthetics, agricultural resources, hazards and hazardous materials, hydrology and water quality, mineral resources, and wildfire. This alternative would decrease impacts to air quality, biological resources, cultural resources, energy, geology and soils, greenhouse gas emissions, noise, population and housing, public services, recreation, tribal cultural resources, transportation, and utilities and services. It would reduce the recreation impacts of the proposed GPU, as it was designed to do, and would improve the park acres/resident ratio compared to the proposed GPU. Recreation impacts to disadvantaged communities would also be reduced. Given the lack of available land for new parks, however, it would not eliminate the significant, unavoidable impact of the project. It would be expected to increase land use and planning impacts relative to the GPU. As with the GPU, impacts to air quality, cultural resources, greenhouse gas emissions, noise, and population and housing would remain

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significant and unavoidable. Overall, impacts under this alternative would be decreased in comparison to the proposed project.

7.3.4 Ability to Achieve Project Objectives

The determination of whether an alternative achieves a particular objective is not black or white. Each alternative has the potential to achieve the respective objective to some extent. None of the alternatives would optimize housing (including affordable housing) and transportation objectives to the extent of the GPU. The table shows “maybe” if it is possible to achieve the specific objective, but the feasibility to do so is uncertain or the level of achievement marginal. Table 7-10 summarizes each alternative’s ability to achieve the project objectives.

Table 7-10 Ability of Each Alternative to Meet the Project Objectives

Objective	General Plan Update	No Project/Current General Plan	Reduced Density	2020 RTP/SCS Consistency	Reduced Park Demand Alternative
1. Promote infill development while respecting and protecting established neighborhoods.	Yes	Yes	Yes	Maybe	Yes
2. Optimize high density residential and mixed-use development that maximizes potential use of mass transit.	Yes	No	No	No	No
3. Provide locations for new housing development that maximizes affordable housing opportunities to achieve both City and regional housing goals.	Yes	No	Maybe	No	Maybe
4. Facilitate new development at intensities sufficient to generate community benefits and attract economic activity.	Yes	No	Maybe	No	Maybe
5. Provide housing and employment opportunities at an urban level of intensity at the city’s edge.	Yes	No	Maybe	No	Maybe
6. Introduce mixed-use urban villages and encourage experiential commercial uses that are more walkable, bike friendly, and transit oriented.	Yes	Yes	Yes	No	Maybe
7. Develop opportunities for live/work, artist spaces, and small-scale manufacturing.	Yes	Maybe	Yes	Maybe	Yes

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No Project/Current General Plan. The No Project/Current General Plan alternative, as shown in Table 7-9, would not achieve many of the proposed GPU's objectives. The existing land use plan does not provide the opportunities for housing and employment at the levels required to meet local and regional goals. Moreover, the No Project alternative would not provide numerous policies as included in the GPU to achieve these goals and invigorate communities. The current General Plan, however, protects established neighborhoods, and several Specific Plans and Special Zoning areas would provide for infill opportunities, protect established neighborhoods, and would result in mixed-use villages and bike- and pedestrian-friendly communities.

Reduced Density Alternative. The Reduced Density Alternative reduces the level of development for two of the five focus areas (55 Fwy/Dyer Road and South Bristol Street) relative to the GPU. No other changes to the GPU are made for this alternative. It is assumed to include the same General Plan policies and would not modify the ~~Circulation-Mobility~~ Element or related improvements. Therefore, this alternative would attain many of the project's objectives. It would not optimize high density housing and mass transit opportunities, and so was found not to attain Objective 2. It would, however, achieve Objectives 3 to 5, but to a lesser extent than the proposed GPU. With the reduced opportunities in the 55 Freeway /Dyer Road and South Bristol focus areas, it would not be as effective in providing affordable housing opportunities and may not be as economically feasible in terms of funding community benefits. It would provide mixed-use opportunities that are bike and pedestrian friendly and provide opportunities for live-work, artist spaces, and small-scale manufacturing.

2020 RTP/SCS Consistency Alternative. Due to the substantial reduction in housing opportunities citywide, this alternative is the least effective in achieving the project objectives of the GPU. By setting a development cap to limit housing and nonresidential development to the projections for the city as reflected in the 2020 RTP/SCS, this alternative reduces housing units by 31,515 relative to the GPU. It reduces housing development potential within the focus areas by 73 percent in comparison to the GPU, and reduces overall city future development by 27 percent. To achieve this reduction, the development cap would not only limit focus area development but would restrict the entitled housing within Specific Plans/Special Zoning areas (reducing total housing within these areas by almost 14,000 units). This alternative clearly would not optimize high density housing that maximizes mass transit use (Objective 2) or provide urban level intensities at the urban edges (Objective 3). Moreover, it would not facilitate intensities that attract economic activities, particularly since it would not allow the maximum entitlement of approved Specific Plans and Special Zoning areas. It would achieve the remainder of the objectives, but to a lesser extent than the GPU. It would protect established neighborhoods, but not promote infill development as much as the GPU or other alternatives (Objective 1). It would provide only limited opportunities for live-work, artist spaces, and small-scale manufacturing (Objective 7).

Reduced Park Demand Alternative. The Reduced Park Demand Alternative reduces residential development within the five focus areas by a total of 11,226 units in comparison to the proposed GPU. Residential development within three of the focus areas (South Main Street, Grand Avenue/17th Street, and West Santa Ana Boulevard) would be limited to development reflected in existing conditions. New units within the 55 Fwy/Dyer Road and South Bristol Street focus areas would be reduced by 5,381 and 2,273 units, respectively, allowing a total new housing development for these two areas of 7,791 units (compared to 15,444 for these two areas under the GPU).

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No other changes to the GPU are made for this alternative. It is assumed to include the same General Plan policies and would not modify the ~~Circulation-Mobility~~ Element or related improvements. Therefore, this alternative would attain some of the project's objectives. It would promote infill development to a lesser extent than the GPU and would protect established neighborhoods (Objective 1), and would also develop opportunities of live-work, artist spaces, and small-scale manufacturing (Objective 7). Given the substantial reduction in housing units, it was also concluded that it would not meet Objectives 2 and 3, to maximize high density residential development and mixed use proximate to potential mass transit use (Objective 2) and to maximize affordable housing and achieve City and regional housing goals (Objective 3). It would, however, achieve Objectives 4 through 6, but to a lesser extent than the proposed GPU. With new opportunities eliminated in three focus areas and the reduced opportunities in the 55 Freeway /Dyer Road and South Bristol focus areas, it would not be as effective in providing affordable housing opportunities and may not be as economically feasible in terms of funding community benefits. It would provide mixed-use opportunities that are bike and pedestrian friendly and provide opportunities for live-work, artist spaces, and small-scale manufacturing.

7.4 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires a lead agency to identify the “environmentally superior alternative” and, in cases where the “No Project” Alternative is environmentally superior to the GPU, the environmentally superior development alternative must be identified. One alternative has been identified as “environmentally superior” to the GPU:

- The RTP/SCS is concluded to be the environmentally superior alternative. As summarized in Section 7.3.3, the No Project alternative is not environmentally superior to the proposed GPU. Both the Reduced Density and RTP/SCS alternatives reduce environmental impacts in comparison to the GPU, but the RTP/SCS reduces more impacts and eliminates a significant, unavoidable impact of the GPU. This alternative was designed with the objective of eliminating the significant population impact of the GPU. This alternative also reflects the alternative that reduces potential future development more than any of the other alternatives.

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