6. Alternatives

This section addresses alternatives to the proposed Project and describes the rationale for including them in the Supplemental EIR. The section also discusses the environmental impacts associated with each alternative and compares the relative impacts of each alternative to those of the proposed Project. In addition, this section describes the extent to which each alternative meets the Project objectives.

6.1 INTRODUCTION

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

Pursuant to CEQA Guidelines Section 15126.6(a), an EIR must describe a reasonable range of alternatives to the proposed Project or to the Project's location that would feasibly avoid or lessen its significant environmental impacts while attaining most of the proposed Project's objectives. CEQA Guidelines Section 15126.6(b) emphasizes that the selection of project alternatives be based primarily on the ability to reduce impacts relative to the proposed project. In addition, CEQA Guidelines Section 15126.6(e)(2) requires the identification and evaluation of an "Environmentally Superior Alternative."

Pursuant to CEQA Guidelines Section 15126.6(d), discussion of each alternative presented in this section of the Supplemental EIR is intended "to allow meaningful evaluation, analysis, and comparison with the proposed project." As permitted by CEQA, the significant effects of each alternative are discussed in less detail than those of the proposed Project, but in enough detail to provide perspective and allow for a reasoned choice among alternatives to the proposed Project.

In addition, the "range of alternatives" to be evaluated is governed by the "rule of reason" and feasibility, which requires the EIR to set forth only those alternatives that are feasible and necessary to permit an informed and reasoned choice by the lead agency and to foster meaningful public participation (CEQA Guidelines Section 15126.6(f)). CEQA generally defines "feasible" to mean an alternative that is capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, technological, and legal factors and other considerations (CEQA Guidelines Sections 15091(a)(3), 15364).

Based on the CEQA requirements described above, the alternatives addressed in this Supplemental EIR were selected in consideration of one or more of the following factors:

- The extent to which the alternative could avoid or substantially lessen any of the identified significant environmental effects of the proposed Project;
- The extent to which the alternative could accomplish the objectives of the proposed Project;
- The potential feasibility of the alternative;
- The appropriateness of the alternative in contributing to a "reasonable range" of alternatives that would allow an informed comparison of relative advantages and disadvantages of the proposed Project and potential alternatives to it; and

- The requirement of the CEQA Guidelines to consider a "no project" alternative; and to identify an "environmentally superior" alternative in addition to the no project alternative (*CEQA Guidelines* Section 15126.6(e)).

Neither the CEQA statute and the CEQA Guidelines, nor recent court cases specify a specific number of alternatives to be evaluated in an EIR. Rather, "the range of alternatives required in an EIR is governed by the rule of reason that sets forth only those alternatives necessary to permit a reasoned choice" (CEQA Guidelines 15126(f)).

6.2 SIGNIFICANT AND UNAVOIDABLE ENVIRONMENTAL IMPACTS

CEQA requires the alternatives selected for comparison in an EIR to avoid or substantially lessen one or more significant effects of the project being evaluated. In order to identify alternatives that would avoid or substantially lessen any of the identified significant environmental effects of implementation of the proposed Project, the significant impacts must be considered, although it is recognized that alternatives aimed at reducing the significant and unavoidable impacts would also avoid or reduce impacts that were found to be less than significant or reduced to below a level of significance with implementation of mitigation measures.

The analysis in Chapter 5 of this Supplemental EIR determined that impacts related to the following would remain significant and unavoidable.

Air Quality

As detailed in Section 5.1, *Air Quality*, implementation of the proposed Project would result in short-term emissions of criteria air pollutants during proposed Project construction and long-term emissions of criteria air pollutants from vehicular emissions, natural gas consumption, landscaping, applications of architectural coatings, and use of consumer products. The emissions from the proposed Project are primarily from vehicle trips and use of consumer products. As described in Section 5.13, *Transportation*, Phase 1 of the proposed Project would generate 4,167 "net" daily trips, with 545 "net" trips in the AM peak hour and 359 "net" trips in the PM peak hour. Phase 2 of the proposed Project is forecast to generate 3,241 "net" daily trips, with 293 "net" trips in the AM peak hour and 271 "net" trips in the PM peak hour. Phase 3 of the proposed Project is forecast to generate 80 fewer "net" daily trips, with 381 "net" trips in the AM peak hour and 58 "net" trips in the PM peak hour. Operation of all three phases at buildout of the proposed Project is anticipated to generate 7,328 net daily trips, including 1,219 AM peak hour and 688 PM peak hour trips.

As shown in Table 5.1-9 in Section 5.1, *Air Quality*, emissions from construction of Phase 1 of the proposed Project would exceed the threshold for significance of NOx. The majority of NOx emissions during construction of Phase 1 would be derived from equipment and truck exhaust related to earthwork, excavation, and export of soils. Despite implementation of GPU FEIR Mitigation Measure AQ-1 and Project-specific Mitigation Measure AQ-2, emissions of NOx would remain over the significance threshold for construction of Phase 1. Therefore, proposed Project construction emissions would be significant and unavoidable.

Also, Table 5.1-19 shows that overlapping emissions from operation of Phase 1 and construction of Phase 2 would exceed SCAQMD thresholds for ROG after implementation of Project-specific Mitigation Measures AQ-1 through AQ-6. The majority of the proposed Project's ROG emission exceedances are from consumer products that the City and Project Applicant cannot control emissions of; and therefore, cannot feasibly be reduced below the SCAQMD thresholds. As a result, impacts from overlapping emissions of Phase 1 operations and Phase 2 construction would be significant and unavoidable.

Likewise, with the addition of Phase 3 construction, Table 5.1-21 shows that overlapping emissions from operation of Phase 1 and Phase 2 with construction of Phase 3 would exceed SCAQMD thresholds for ROG

and NOx after implementation of Project-specific Mitigation Measures AQ-1 through AQ-6. As detailed previously, the majority of the proposed Project's emission exceedances are from consumer product and mobile sources and cannot feasibly be reduced by either the City or Project Applicant below the SCAQMD thresholds. Emissions from both consumer products and motor vehicles are controlled by state and federal standards and the City and Project Applicant have no control over these standards. Therefore, impacts from overlapping emissions of Phases 1 and 2 operations and Phase 3 construction would be significant and unavoidable. In addition, as shown in Table 5.1-22, emissions from buildout of the proposed Project would exceed SCAQMD thresholds for ROG despite implementation of Mitigation Measures AQ-1 through AQ-6. Therefore, impacts from operation of the proposed Project would be significant and unavoidable.

Further, because the emissions would exceed thresholds, the proposed Project would result in a conflict with implementation of the AQMP and impacts related to the AQMP would also be significant and unavoidable. In addition, per SCAQMD's methodology, if an individual project would result in air emissions of criteria pollutants that exceeds the SCAQMD's thresholds for project-specific impacts, then it would also result in a cumulatively considerable net increase of these criteria pollutants. Due to the proposed Project's exceedance of the NOx and ROG thresholds, impacts would be cumulatively considerable and unavoidable, consistent with the findings of the GPU FEIR.

Parks and Recreation

As detailed in Section 5.12, *Parks and Recreation*, the City currently has approximately 1.2 acres of public park and/or recreational space per every 1,000 residents which is below the City's GPU policy of 3 acres of parkland per 1,000 residents. Based on the City's General Plan policy to attain 3 acres of public park and/or recreational space per 1,000 residents, buildout of the proposed Project results in a need for approximately 27.7 additional acres of parkland to serve the 9,238 new residents of the Project site. The 13.1 acres of publicly accessible open space within the 17.21 acres of public and private open space provided by the proposed Project would be approximately 10.49 acres less than the City's parkland policy, which would contribute to the existing citywide parkland deficiency. As described by the GPU FEIR, the City is an urban and developed area and there are no undeveloped areas to be converted into new parkland. Although the proposed Project and cumulative projects would be required to provide park and recreational facilities, private open space, and/or pay in-lieu fees as required by the municipal code, the proposed Project's impacts related to the amount of parkland within the City would be significant and unavoidable and also cumulatively considerable. Thus, both Project and cumulative impacts related to parks and recreational facilities would be significant and unavoidable, consistent with the findings of the GPU FEIR.

6.3 PROJECT OBJECTIVES

The following objectives have been identified in order to aid decision makers in their review of the proposed Project and its associated environmental impacts.

- Implement the vision and objectives established in the City of Santa Ana General Plan for the South Bristol Street Focus Area to create a southern gateway to the City. The South Bristol Street Focus Area objectives:
    - Capitalize on the success of the South Coast Metro area;
    - Introduce mixed-use urban villages and encourage experiential commercial uses that are more walkable, bike friendly, and transit oriented;
    - Realize an intense, multi-story presence along the Bristol Street corridor; and
    - Provide for mixed-use opportunities while protecting adjacent, established low density neighborhoods.

- Allow for the flexible redevelopment of the underutilized Project site to provide a balanced mix of residential, retail, and hospitality uses in the South Bristol Street Focus Area that integrate into the existing urban systems and provide a safe and attractive environment for living and working, as encouraged by the GPU.
- Transform an auto-oriented shopping plaza with large surface parking areas to a community which maximizes opportunities for onsite open space which can be accomplished through the provision of subsurface shared parking and intensity of land use permitted by the General Plan.
- Develop high quality residential spaces that reflect modern lifestyles, while responding to the need for additional housing at a higher density in an area of the City planned for growth.
- Develop a project with a mix of land uses that stimulate economic activity, commerce, and new housing opportunities in the South Bristol Street Focus Area.
- Have a positive contribution to the local economy through new capital investment, the creation of new jobs, and the expansion of the tax base.
- Create a walkable mixed-use development to encourage and enhance pedestrian activity within the Specific Plan area and the local community.
- Enhance non-vehicular activity by providing onsite and offsite pedestrian and bicycle facilities that link with existing facilities and transit services.
- Improve existing infrastructure to support the Related Bristol Specific Plan consistent with the General Plan conditions.
- Provide a project that contributes to the creation of a vibrant urban core for the City and takes advantage of the site's location within the South Coast Metro area. Provide a project that contains vibrant and attractive community amenities, recreational and open space areas, and gathering spaces that are directly accessible to residents and the community.
- Provide community benefits commensurate with the Specific Plan development proposal including public open space onsite and locations for public community events, as well as streetscape improvements along the Project site frontages of MacArthur Boulevard, Bristol Street, Sunflower Avenue and South Plaza Drive.

6.4 ALTERNATIVES CONSIDERED BUT REJECTED

Pursuant to CEQA Guidelines Section 15126.6(c), an EIR must briefly describe the rationale for selection and rejection of alternatives. The Lead Agency may make an initial determination as to which alternatives are potentially feasible and, therefore, merit in-depth consideration, and which are infeasible and need not be considered further. Alternatives that are remote or speculative, or the effects of which cannot be reasonably predicted, need not be considered (CEQA Guidelines Section 15126.6(f), (f)(3)). This section identifies alternatives considered by the Lead Agency but rejected as infeasible and provides a brief explanation of the reasons for their exclusion. Alternatives may be eliminated from detailed consideration in the EIR if they fail to meet most of the project objectives, are infeasible, or do not avoid any significant environmental effects.

- **Alternate Site.** An alternate site for the proposed Project was eliminated from further consideration. The Project objectives are to redevelop the Project site consistent with the objectives of the City's GPU District Center-High (DC-5) land use designation and South Bristol Street Focus Area that includes new mixed-use development with housing in proximity to transit. In addition, due to the

urban and built out nature of the City, development of 3,750 multi-family residential units, 350,000 SF of commercial uses, a 250 room hotel, and 200 senior living/continuum of care units on another 41.13-acre underutilized site at a different location would likely require demolition of existing structures, require similar mitigation, and have similar impacts as the proposed Project. CEQA specifies that the key question regarding alternative site consideration is "whether any of the significant effects of the project would be avoided or substantially lessened by putting the project at another location." Given the size and nature of the proposed Project and the Project objectives, it would be infeasible to develop and operate the proposed Project on an alternative site with fewer environmental impacts, while also implementing the City's GPU. Therefore, the Alternative Site Alternative was rejected from further consideration.

- **No Project/Buildout of Existing General Plan Designation.** Buildout of the Project site at the maximum allowable density pursuant to the City's General Plan DC-5 land use designation was eliminated from further consideration. The DC-5 land use designation allows for development of the Project site at a maximum 125 dwelling units per acre (du/ac) and a FAR of 5.0, which would allow for development of up to 8,733,780 SF of mixed uses, inclusive of residential uses. The proposed Project would result in approximately 91 du/ac and a FAR of 2.7. The No Project/Buildout of Existing General Plan Designation Alternative would result in an 85 percent intensification of uses onsite in comparison to the proposed Project. This alternative would require demolition of the same structures, require similar mitigation, and would increase air quality emissions and require more parkland in comparison to the proposed Project. Given the increased intensity of the No Project/Buildout of the Existing General Plan Designation Alternative, it would not result in fewer environmental impacts than the proposed Project. Therefore, the No Project/Buildout of Existing General Plan Designation Alternative was rejected from further consideration.

6.5 ALTERNATIVES SELECTED FOR FURTHER ANALYSIS

Three alternatives to the proposed Project have been identified for further analysis as representing a reasonable range of alternatives that attain most of the objectives of the Project, may avoid or substantially lessen any of the significant effects of the proposed Project, and are feasible from a development perspective. These alternatives have been developed based on the criteria identified in Section 6.1, and are described below:

Alternative 1: No Project/No Build. Pursuant to Section 15126.6(e)(2) of the CEQA Guidelines, the EIR is required to "discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time the 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."

Therefore, under this alternative, no new development would occur on the Project site, and it would remain in its existing condition with 16 existing buildings totaling 465,063 SF functioning as a shopping center. In this alternative scenario, the 16 buildings are assumed to be fully operational as a shopping center with restaurants, a supermarket, banks, a dry cleaner, medical and dental offices, financial offices, and fitness uses. Hence, this alternative compares impacts of the proposed Project with the existing buildings operating at full capacity for shopping center uses.

Alternative 2: Reduced Project Alternative. Under this alternative, a reduction in commercial square footage would be developed onsite. After consideration of viable alternatives, it was determined that a reasonable decrease in development within the Project site would consist of a reduction of 100,000 SF of commercial retail and elimination of the 250-room hotel. This alternative would develop and operate 3,750

multi-family residential units, a 200-room senior living/continuum of care facility, and 250,000 SF of retail and restaurant commercial uses.

The reduction would result in the construction of 1,375 units, 200 senior living/continuum of care units, and 150,000 SF of commercial uses in Phase 1; including an administrative Police Department substation to be located within the commercial use area. Approximately 856 units and 65,000 SF of commercial uses would be constructed in Phase 2; and 1,519 units and 35,000 SF of commercial uses would be constructed in Phase 3.

To support the reduced Project under this alternative, the same ratio of parking spaces would be provided as proposed for the proposed Project. Under the Reduced Project Alternative, certain offsite improvements (including storm drain upgrades, restriping, and signal installation) are assumed, consistent with the proposed Project. In addition, the same amount of recreational facilities and common open space would be provided as the proposed Project.

Like the proposed Project, this alternative would require a zoning map amendment to amend the existing zoning of General Commercial (C-2) and Commercial Residential (CR) to Related Bristol Specific Plan District.

Alternative 3: Buildout of the Existing Zoning Designations Alternative. Under this alternative, no zoning map amendment would occur, and the Project site would be built out according to the existing zoning designations, as shown on Figure 3-5 in Section 3.0, *Project Description*. Therefore, this alternative would include development of the 23.96-acre area north of Callen's Common with only commercial uses pursuant to the C-2 zoning designation, which would result in approximately 782,774 SF at the maximum FAR of 0.75 with a building height of 35 feet. This alternative would provide surface parking and would not develop Bristol Central Park in the northern portion of the site.

Also, the 17.17-acre area south of Callen's Common would be redeveloped with commercial uses and mixed-uses pursuant to the CR zoning designation, which would result in approximately 250,000 SF of ground-floor commercial uses and office space, approximately 250 hotel rooms, approximately 200 senior living/continuum of care units, and 1,375 multi-family units would be developed to a maximum FAR of 5.0. Buildings at the northwestern corner of the CR zoned area would be a maximum of 50 feet, buildings at 200 feet from adjacent residential uses would be a maximum height of 100 feet. The buildings toward the southeast corner of the site would be a maximum of 25 stories. Parking within areas south of Callen's Common would be underground and open space within this area would be consistent with the proposed Project.

Overall, buildout of the Existing Zoning Alternative would develop the site with 682,774 SF more commercial space than proposed by the Project, totaling 1,032,774 SF of commercial uses (including an administrative Police Department substation), the same number of hotel rooms and senior living/continuum of care units as the proposed Project, and 2,375 fewer residential units for a total of 1,375 multi-family units.

6.6 ALTERNATIVE 1: NO PROJECT/NO BUILD

Under this alternative, the proposed Project would not be approved, and no development would occur. The existing 16 commercial buildings would remain and would be operational. In accordance with the CEQA Guidelines, the No Project/No Build Alternative for a development project on an identifiable property consists of the circumstance under which the project does not proceed. Section 15126.6(e)(3)(B) of the CEQA Guidelines states that, "In certain instances, the no project alternative means 'no build' wherein the existing environmental setting is maintained." In addition, the no project includes 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.

Therefore, under this alternative, no new development would occur on the Project site, and it would remain in its existing condition with 16 existing buildings totaling 465,063 SF functioning as a shopping center. Under this alternative scenario, the buildings are fully operational as a shopping center with restaurants, a supermarket, banks, a dry cleaner, medical and dental offices, financial offices, and fitness uses. Hence, this alternative compares impacts of the proposed Project with the existing buildings operating at full capacity for shopping center uses. Accordingly, Alternative 1: No Project/No Build provides a comparison between the environmental impacts of the proposed Project in contrast to the result from not approving, or denying, the proposed Project. Thus, this alternative is intended to meet the requirements of CEQA Guidelines Section 15126.6(e) for evaluation of a no project alternative.

6.6.1 ENVIRONMENTAL IMPACTS

Air Quality

The No Project/No Build Alternative would not involve construction activities. Demolition of the existing structures and pavement would not occur. Excavation and grading of the site would not occur, and operation of construction equipment would not occur on the site. Therefore, the No Project/No Build Alternative would not generate any construction-related air pollutant emissions; and the significant and unavoidable construction impacts related to criteria emissions associated with the proposed Project would not occur under the No Project/No Build Alternative.

The Project site currently contains 16 commercial buildings and associated surface parking areas that generate air pollution associated with typical business operations. The No Project/No Build Alternative would continue operation of the existing buildings at full capacity, which results in an exceedance of NOx, ROG, and CO thresholds. The estimated operation-source emissions from operation of the existing 465,063 SF of commercial retail uses on the Project site are provided on Table 6-1.

Table 6-1: Existing Commercial Retail Operational Air Quality Emissions

Source	Emissions (Maximum Pounds Per Day)					
	ROG	**NO_X**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
Existing Operational Emissions						
Total Existing Operational Emissions	**115.38**	**59.38**	**554.53**	**40.73**	**55.13**	**4.46**
SCAQMD Threshold	*55*	*55*	*550*	*150*	*150*	*55*
Exceeds Threshold?	**Yes**	**Yes**	**Yes**	**No**	**No**	**No**

Source: Air Quality Assessment, Appendix B.

The No Project/No Build Alternative would avoid the proposed Project's significant impact related to the net increase of a criteria pollutant, cumulatively considerable increases, and conflict with, or obstruct, implementation of the AQMP, as an increase in emissions over the existing condition would not occur. However, operation of the existing commercial retail buildings at full capacity would also result in exceedances of SCAQMD thresholds.

Cultural Resources

The existing buildings would remain onsite under the No Project/No Build Alternative. However, as determined in Section 5.2, *Cultural Resources*, none of the existing buildings meet any of the historic resource criteria and do not meet the definition of a historical resource pursuant to CEQA or the City of Santa Ana. In addition, the Project site is not adjacent to any historic structures. Therefore, consistent with the proposed Project, no impacts related to historic resources would occur from the No Project/No Build Alternative.

As discussed in Section 5.2, *Cultural Resources*, the Project area is sensitive for archaeological deposits. However, with implementation of GPU FEIR Mitigation Measure CUL-6 and Project-specific Mitigation Measures CR-1 and CR-2, impacts would be less than significant. The No Project/No Build Alternative would not involve excavation or other construction that has the potential to impact any subsurface resources. Thus, the No Project/No Build Alternative would not have the potential to impact archaeological resources or human remains, and no mitigation measures are required. Therefore, the No Project/No Build Alternative would result in a reduction in potential impacts to archaeological resources compared to the proposed Project.

Energy

The No Project/No Build Alternative assumes ongoing use of the existing buildings on the Project site, and similar to the proposed Project, this alternative requires energy. The service demand generated by the 16 commercial buildings would likely be lower than that of the proposed Project because a 24-hour resident population would not exist. However, the No Project/No Build Alternative would not provide upgraded energy efficient infrastructure, such as electrical, plumbing, and water efficient irrigation, as some of the existing onsite buildings were built as early as the 1970s. Overall, both the proposed Project and the No Project/No Build Alternative would result in less than significant impacts related to energy.

Geology and Soils

No new construction activities, including demolition and grading, would occur under the No Project/No Build Alternative. Therefore, there would be no potential for additional operational workers or residents, or new buildings and structures to experience seismic ground shaking, lateral spreading, subsidence, or collapse within the Project site, and no mitigation measures would be required. However, the buildings and structures that exist in the Project site were built as early as the 1970s, prior to current seismic safety codes; therefore, this alternative, by retaining older buildings and structures, would not provide increased structural engineering and could increase people's exposure to hazards from strong ground shaking compared to the proposed Project.

In addition, because the No Project/No Build Alternative does not involve grading or other ground disturbance activities, potential impacts to paleontological resources would not occur. Thus, impacts under this alternative would be reduced compared to the mitigation that is required for the proposed Project.

Greenhouse Gas Emissions

The No Project/No Build Alternative would avoid the short-term, construction related GHG emissions because no new buildings or uses would occur under this alternative; and an increase in operational GHG emissions would not occur. As detailed in Section 5.5, *Greenhouse Gas Emissions*, operation of the existing commercial retail buildings on the Project site at full capacity generates 16,138 $MTCO_2e$/yr of GHG emmissions, which would be less than the 35,285 $MTCO_2e$/yr of emissions resulting from buildout of the proposed Project with implementation of mitigation.

The No Project/No Build Alternative would not result in an increase of GHG emissions, as no new development would occur, and mitigation would not be required. However, operation of the site as commercial uses would not be consistent with 2022 CARB Scoping Plan goals related to transportation electrification, VMT reduction, building decarbonization, or the Santa Ana Climate Action Plan goals related to development of multi-family uses in commercial corridors. As such, the No Project/No Build Alternative would not result in a net increase of GHG emissions, but would also not advance goals and policies set forth by the 2022 CARB Scoping Plan or Santa Ana Climate Action Plan. Because no mitigation would be required for the No Project/No Build Alternative, impacts would be less than the proposed Project.

Hazards and Hazardous Materials

The northern portion of the Project site contains TPH-d contaminated soils that are above residential screening levels but that could be reused onsite as backfill material or in non-residential areas. However, any soils that exceed both residential and commercial screening levels would need to be excavated and removed during Project excavation and grading activities as required by DTSC, California Integrated Waste Management Board, and/or the RWQCB. As a result, the proposed Project requires implementation of Mitigation Measure HAZ-1 that provides for a Soil Management Plan to be prepared by a qualified hazardous materials consultant that would detail procedures and protocols for excavation and disposal of onsite hazardous materials. The No Project/No Build Alternative would not require this mitigation because no construction activities would occur, and the existing onsite contaminated soils would remain in place. Thus, potential impacts related to removal and disposal of contaminated soils would be avoided by this alternative; however, the potentially contaminated soils would remain on the Project site.

Hydrology and Water Quality

Existing water quality conditions, groundwater supplies, drainage patterns, and runoff water amounts would not change under the No Project/No Build Alternative because no new development would occur. This alternative would not introduce new sources of water pollutants from either construction on the site or new operations on the site because no new development or different uses would occur. However, this alternative would not include installation of new low-impact development (LID), source control, site design, and treatment control best management practices (BMPs) to minimize runoff and water pollution, which would be implemented as a part of the proposed Project. Further, as discussed in Section 5.7, *Hydrology and Water Quality*, the existing site contains 37.02 acres of impermeable surfaces, which is greater than the proposed Project's 35.37 acres of impermeable surfaces. In addition, this alternative would not initiate the improvements from the existing 54-inch and 60-inch stormwater reinforced concrete pipes (RCP) in Sunflower Avenue to a 72-inch RCP for 2,230 linear feet or to the existing 42-inch stormwater RCP in South Plaza Drive to a 60-inch RCP for 320 linear feet. Although these upgrades are not triggered by the proposed Project, they would be made as a part of the proposed Project. These improvements would not be made under the No Project/No Build Alternative, and it is at the City's discretion as to when these public storm drain upgrades would be constructed in the future. Under the No Project/No Build Alternative, the beneficial improvements may not occur. Overall, hydrology and water quality impacts for the proposed Project and under this alternative scenario would be less than significant.

Land Use and Planning

The Project site has a General Plan Land Use designation of DC-5 (District Center-High) and is zoned C-2 (General Commercial) and CR (Commercial Residential). The No Project/No Build Alternative would operate the existing commercial buildings on the Project site, which would not include a Specific Plan or require a zoning map amendment. No impacts related to land use and planning would occur by retention of the existing onsite uses. The No Project/No Build Alternative would not physically divide an established community, as no changes to the site would occur. Also, the No Project/No Build Alternative would not result in conflict with existing policies, plans or regulations related to an environmental effect. However, this alternative would not implement the City's General Plan land use designation, South Bristol Street Focus Area objectives, or the SCAG policies related to high-density, infill development. This alternative also would not assist in improvement of the job/housing balance or reduction in vehicle miles traveled.

A zoning map amendment is required to change the zoning of the site from CR and C-2 to Related Bristol Specific Plan District. Development of the site for multi-family residential, hotel, senior living/continuum of care, and commercial uses would integrate into the planned development of the Project site pursuant to the DC-5 GPU designation and the surrounding development. The site would provide housing for local employees working nearby in Santa Ana, Costa Mesa, and Irvine. The site would also provide commercial retail services and restaurants for onsite residents and employees working nearby. The proposed zoning map amendment

from CR and C-2 to Related Bristol Specific Plan District would not conflict with a policy or plan adopted for the purpose of avoiding or mitigating an environmental effect. The CR and C-2 zoning designations do not provide avoidance of an environmental effect and the Related Bristol Specific Plan District provides for development flexibility to design a project that could avoid an environmental effect and fully implement the GPU. In addition, the proposed Project would implement many of the SCAG policies related to high-density, infill development, and improvement of the job/housing balance.

Based on the thresholds of significance, neither the No Project/No Build Alternative nor the proposed Project would have land use impacts. Therefore, impacts from the No Project/No Build Alternative would be consistent with impacts from the proposed Project.

Noise

The proposed Project would result in a short-term increase in noise from construction and a long-term increase in noise from operation. The short-term construction noise and vibration impacts would be less than significant with incorporation of mitigation; and operation of the proposed Project would also result in less than significant impacts.

The No Project/No Build Alternative would not generate an increase in ambient noise sources, as no changes to the Project site would occur. The number of vehicular trips generated by this alternative would not increase and would be less than those generated by the proposed Project; hence, traffic noise under this alternative would be less. Also, this alternative would not involve exterior construction related noise and vibration, as only potential tenant improvements to the existing buildings would occur under this alternative. As such, this alternative would not require implementation of GPU FEIR Mitigation Measure N-1 or Project-specific Mitigation Measure NOI-1, which is required for the proposed Project. Additionally, this alternative would not generate a residential population that could be impacted by roadway noise sources. However, consistent with the proposed Project, the noise generated under this alternative would be less than significant. Overall, the No Project/No Build would result in less than significant impacts related to noise and would result in less impacts than those from the proposed Project.

Population and Housing

The proposed Project would develop residential units that would have 9,238 residents based on a person per household factor of 2.41 and non-residential uses that would generate approximately 1,092 employees at full occupancy, which would be within SCAG's projected growth and the projected growth identified within the GPU South Bristol Street Focus Area and would improve the jobs-housing ratio and corresponding reduction in vehicle miles traveled would occur.

The No Project/No Build Alternative would continue the operation of the existing commercial buildings on the Project site. No residential development would occur and no increase in employees is assumed. This alternative would not accommodate the increase in residents and employees as planned by the GPU or pursuant to the SCAG growth projections and directives to provide for infill mixed-use development on underutilized sites in TPAs and High Quality Transit Areas. Additionally, the No Project/No Build Alternative would not result in a benefit to the jobs housing balance or reduction in vehicle miles traveled. However, the No Project/No Build Alternative would result in a less than significant impact related to population and housing, which is the same finding as for the proposed Project.

Public Services

The No Project/No Build Alternative would continue use of the existing commercial buildings on the Project site, and similar to the proposed Project, the employees onsite would require public services. However, the demand for fire services, police services, schools, and libraries generated by the existing buildings is lower than that of the proposed Project because a 24-hour resident population associated with the proposed Project would not exist, and the employee population onsite is much less than the number of residents and

employees that would be generated by the proposed Project. However, the Santa Ana Police Department substation that would be provided by the proposed Project would not occur by this alternative, and a new public service facility to serve the community would not be provided. Overall, both the proposed Project and the No Project/No Build Alternative would result in less than significant impacts related to public services.

Recreation

Based on the persons per household assumptions for multi-family residential development set forth in the GPU, the proposed Project would result in approximately 9,238 residents and 1,092 employees at full occupancy, which would generate a demand for park and recreation facilities. The proposed Project includes approximately 13.1 acres of publicly accessible open space and buildings with residential development would include private recreation facilities for residents. There are currently 69.48 acres of Santa Ana parkland within two miles of the Project site, including the 10.4-acre Bomo Koral Park, which is less than 10-minutes walking distance from the Project site. However, due to the existing deficiency in parkland in the City of Santa Ana and developed nature of the City, without undeveloped site or areas suitable for redevelopment for additional parkland, the proposed Project's contribution to cumulative impacts related to parks and recreation would be significant and unavoidable.

The No Project/No Build Alternative would not generate any residents or additional employees, and no increase in demand for parks and recreation facilities would occur from this alternative. Therefore, the No Project/No Build Alternative would result in no new impacts related to parks and recreation. Also, this alternative would not result in a significant cumulative impact related to parks and recreation, which would occur from the proposed Project. Overall, impacts related to parks and recreation from the No Project/No Build Alternative would be less than those of the proposed Project. However, the No Project/No Build Alternative would not provide approximately 13.1 acres of new publicly accessible open space within the City.

Transportation

As described in Section 5.13, *Transportation*, the Project site is located within a TPA and a High Quality Transit Area. At full buildout, the proposed Project would result in a net increase of 7,328 average daily trips with an increase of 1,219 AM peak hour trips and 688 PM peak hour trips. The proposed Project would implement high-density mixed-use infill development that would improve the job/housing balance and thereby reduce the related vehicle miles traveled (VMT). The Project site is located near existing employment, services, and retail destinations, and is adjacent to six existing OCTA bus routes with high quality public bus stops. In addition, the proposed Project includes sidewalk, bikeway, and bus stop improvements, which provides additional non-vehicular options to reduce dependency on passenger vehicles cars, time spent in traffic, and more closely link residents to jobs and services in comparison to a project of similar size and land without close access to employment, service, retail, public transit, and freeways.

As shown on Table 5.13-3 in Section 5.13, *Transportation*, operation of the existing commercial uses generates 15,490 total vehicle trips, of which 351 are in the AM peak hour and 1,122 in the PM peak hour. The No Project/No Build Alternative would have 7,328 fewer vehicular trips per day, 1,219 fewer AM peak hour trips, and 688 fewer PM peak hour trips than the proposed Project. However, this alternative would not implement an infill development consistent with the General Plan, improve the job/housing balance, or reduce vehicle miles traveled. This alternative would not provide a mix of land uses within the boundaries of the Specific Plan area within a High Quality Transit Area and TPA. Overall, the No Project/No Build would result in less than significant impacts related to transportation, which would be the same level of impact as the proposed Project.

Tribal Cultural Resources

The proposed Project involves construction that could result in inadvertent impacts to unknown buried tribal cultural resources. Therefore, the proposed Project requires mitigation to reduce the potential impacts to these resources that could occur during construction. However, the No Project/No Build Alternative would not involve ground disturbance; no excavation or grading would occur. Hence, this alternative would not have the potential to impact unknown buried tribal cultural resources and mitigation is not required. Thus, potential impacts to tribal cultural resources under the No Project/No Build Alternative would be less than the proposed Project.

Utilities and Service Systems

The proposed Project would result in approximately 9,238 residents and 1,092 employees at full occupancy, which would require additional water and wastewater systems. As described in Section 5.15, *Utilities and Service Systems*, the proposed Project would provide offsite water and stormwater improvements. The No Project/No Build Alternative would operate the existing commercial buildings on the Project site with no increased demands on water or wastewater infrastructure would occur. However, this alternative would not include improvements to offsite water or drainage infrastructure, and this alternative would also not install LID and CALGreen/Title 24 compliant infrastructure. However, both the proposed Project and the No Project/No Build Alternative would result in less than significant impacts related to utilities and service systems.

6.6.2 CONCLUSION

Ability to Reduce Impacts

The No Project/No Build Alternative would result in continued operation of the 16 commercial buildings on the Project site, and development and operation of proposed mixed-use development would not occur. As a result, the No Project/No Build Alternative would avoid the significant and unavoidable air quality and parks and recreation impacts that would occur from the proposed Project. Additionally, operational impacts would be reduced and the mitigation measures that are detailed in Chapter 5.0, which include measures related to air quality, cultural resources, geology and soils, greenhouse gas emissions, hazards and hazardous materials, noise, and tribal cultural resources, would not be required.

However, the benefits of the proposed Project would also not be realized, such as implementation of the General Plan DC-5 land use and South Bristol Street Focus Area objectives, improvements to offsite bicycle lanes, sidewalks, and stormwater infrastructure, CALGreen/DAMP/LID infrastructure improvements to storm water quality, and a reduction of drainage runoff from the area, removal of potentially contaminated soils, provision of housing within TPAs and High Quality Transit Areas, improvements to the jobs/housing balance, and the potential to reduce vehicle miles traveled. Overall, the No Project/No Build Alternative would not generate the significant impacts of the proposed Project and would not require implementation of mitigation measures; however, this alternative would not realize the benefits of the proposed Project.

Ability to Achieve Project Objectives

As shown in Table 6-5, the No Project/No Build Alternative would not meet any of the Project objectives, as listed below:

- The No Project/ No Build Alternative would not meet the South Bristol Street Focus Area objectives, as no new development would occur.
    - The No Project/ No Build Alternative would not capitalize on the success of the South Coast Metro area and would not implement new mixed use development;
    - The No Project/ No Build Alternative would not introduce mixed-use urban villages;
    - The No Project/ No Build Alternative would not realize an intense, multi-story presence along the Bristol Street corridor; and

  - The No Project/ No Build Alternative would not provide mixed-use opportunities while protecting adjacent, established low density neighborhoods, as no new development would occur.

- The No Project/ No Build Alternative would not allow for flexible redevelopment of the underutilized Project site to provide a balanced mix of residential, retail, and hospitality uses in the South Bristol Street Focus Area that integrate into the existing urban systems and provide a safe and attractive environment for living and working, as encouraged by the GPU.
- The No Project/ No Build Alternative would not transform an auto-oriented shopping plaza with large surface parking areas to a community which maximizes opportunities for onsite open space which can be accomplished through the provision of subsurface shared parking and intensity of land use permitted by the General Plan.
- The No Project/ No Build Alternative would not develop high quality residential spaces that reflect modern lifestyles, while responding to the need for additional housing at a higher density in an area of the City planned for growth.
- The No Project/ No Build Alternative would not develop a project with a mix of land uses that stimulate economic activity, commerce, and new housing opportunities in the South Bristol Street Focus Area.
- The No Project/ No Build Alternative would not have a positive contribution to the local economy through new capital investment, the creation of new jobs, and the expansion of the tax base.
- The No Project/ No Build Alternative would not create a walkable mixed-use development to encourage and enhance pedestrian activity within the Project site and the local community.
- The No Project/ No Build Alternative would not enhance non-vehicular activity by providing on-site and offsite pedestrian and bicycle facilities that link with existing facilities and transit services.
- The No Project/ No Build Alternative would not improve existing infrastructure.
- The No Project/ No Build Alternative would not provide a project that contributes to the creation of a vibrant urban core for the City and takes advantage of the site's location within the South Coast Metro area. The alternative would not provide a project that contains vibrant and attractive community amenities, recreational and open space areas, and gathering spaces that are directly accessible to residents and the community.
- The No Project/ No Build Alternative would not provide community benefits commensurate with the proposed Project including publicly accessible open space onsite and locations for public community events, as well as streetscape improvements along the Project site frontages of MacArthur Boulevard, Bristol Street, Sunflower Avenue and South Plaza Drive.

Overall, this alternative would not implement the GPU's goals for the DC-5 land use designation for the South Bristol Street Focus Area and would not meet any of the objectives of the proposed Project.

6.7 ALTERNATIVE 2: REDUCED PROJECT ALTERNATIVE

Under this alternative, a reduction in commercial square footage would be developed on the Project site. After consideration of viable alternatives, it was determined that a reasonable decrease in development within the Project would include a reduction of 100,000 SF of commercial retail and elimination of the 250-room hotel. This alternative would develop and operate 3,750 multi-family residential units, a 200-unit senior living/continuum of care use, and 250,000 SF of retail and restaurant commercial uses.

The reduction would result in the construction of 1,375 units, 200 senior living/continuum of care units, and 150,000 SF of commercial uses in Phase 1; including an administrative Police Department substation to be located within the commercial use area. Approximately 856 units and 65,000 SF of commercial uses would be constructed in Phase 2; and 1,519 units and 35,000 SF of commercial uses would be constructed in Phase 3.

This alternative would provide the same ratio of parking spaces in surface and underground parking structures. Hence, a proportional reduction in the total number of parking spaces provided would occur. The Reduced Project Alternative would include the same amount of recreational facilities and common open space as the proposed Project. In addition, certain offsite improvements (including storm drain upgrades, restriping, and signal installation) would be required and provided consistent with the proposed Project.

Like the proposed Project, this alternative would require a zoning map amendment to amend the existing zoning of General Commercial (C-2) and Commercial Residential (CR) to Related Bristol Specific Plan District.

6.7.1 ENVIRONMENTAL IMPACTS

Air Quality

The Reduced Project Alternative would incrementally reduce the amount and duration of construction activities compared to the proposed Project, which in turn would result in less overall construction-related air quality emissions. Also, the decrease in commercial square footage and elimination of the hotel would result in smaller structure size, and less building and architectural coating activities would be needed than those associated with the proposed Project. The Reduced Project Alternative would also require subsurface excavation for underground parking, which would result in similar haul trips and NOx emissions as those resulting from construction of the proposed Project. Further, the demolition, site preparation, grading, drainage/ utilities/ subgrade, and paving phases would include the entire site; and therefore, construction of this alternative would have similar levels of maximum daily emissions. As discussed in Section 5.1, *Air Quality,* emissions from construction of Phase 1 of the proposed Project would exceed the threshold for significance of NOx. The majority of NOx emissions during construction of Phase 1 would be derived from equipment and truck exhaust related to earthwork, excavation, and export of soils. Despite implementation of GPU FEIR Mitigation Measure AQ-1 and Project-specific Mitigation Measure AQ-2, emissions of NOx would remain over the significance threshold for construction of Phase 1. As construction of the Reduced Project Alternative would still require grading work, excavation, and export to the same or similar extent as the proposed Project, the alternative would also result in significant impacts related to emissions of NOx. As air quality emissions are based on peak day levels pursuant to SCAQMD guidance, the Reduced Project Alternative, and its shorter construction schedule, would not result in a reduction of peak day NOx emissions in a manner which would result in emissions levels below SCAQMD thresholds. Thus, like the proposed Project, the Reduced Project Alternative would result in significant and unavoidable construction impacts related to air quality.

As detailed in Section 5.1, *Air Quality*, buildout of the proposed Project, as detailed in Table 5.1-22, would result in net emissions of 60.28 lbs/day of ROG with mitigation, which would be 5.28 lbs/day over the SCAQMD regional threshold. As detailed in Table 6-2, the Reduced Project Alternative would result in 2,722 fewer daily vehicular trips than the proposed Project, resulting in fewer vehicular emissions. In addition, the Reduced Project Alternative would include 100,000 SF less commercial space and would have no hotel. This reduction in hotel rooms and square footage of commercial space, and daily vehicular trips would result in reducing ROG emissions by over 5.28 lbs/day as the reduced intensity of development would result in a proportional reduction in the use of consumer products onsite. However, like the proposed Project, the Reduced Project alternative would likely be required to adopt mitigation in order to reduce emissions of ROGs to below the SCAQMD threshold. Thus, daily operational emissions from the Reduced Project Alternative would not exceed SCAQMD thresholds and would result in less than significant operational air quality impacts with mitigation incorporated. Therefore, the Reduced Project Alternative would generate less

overall air quality emissions than the proposed Project and would reduce the significant and unavoidable impact from operation of the proposed Project to a less than significant impact with mitigation. Thus, the Reduced Project Alternative would have a reduced impact related to air quality emissions and would avoid full buildout significant and unavoidable operational impacts related to exceedance of ROG emissions.

Cultural Resources

The Reduced Project Alternative would develop less commercial space and no hotel rooms in comparison to the proposed Project; but would require similar site preparation activities including grading and excavation as the proposed Project. Consistent with the findings for the proposed Project, no impacts related to historic resources would occur under this alternative scenario.

As discussed in Section 5.2, *Cultural Resources*, the Project area is sensitive for archaeological deposits. However, with implementation of GPU FEIR Mitigation Measure CUL-6 and Project-specific Mitigation Measures CR-1 and CR-2, impacts would be less than significant. Like the proposed Project, this alternative would require implementation of mitigation to reduce potential impacts to unknown archaeological resources onsite. Further, like the proposed Project, in the unanticipated event that human remains are found during construction activities compliance with California Health and Safety Code Section 7050.5 would ensure that human remains are treated with dignity and as specified by law and provide that the impact is less than significant. Overall, cultural resource impacts would be less than significant with mitigation consistent with the conclusions for the proposed Project.

Energy

The Reduced Project Alternative would redevelop the Project site to provide multi-family residential units, senior living/continuum of care units, and commercial uses that would require energy supplies. Like the proposed Project, the Reduced Project Alternative would be developed in compliance with the CALGreen/Title 24 requirements related to energy and would include similar features to reduce energy consumptions, such as electric vehicle charging stations. As described in Section 5.3, *Energy*, the proposed Project would not use large amounts of energy or fuel in a wasteful manner. Because the Reduced Project Alternative would not have a hotel, would have 100,000 SF less commercial square footage, and would implement the same energy efficient infrastructure, this alternative would demand less energy. However, neither the proposed Project nor the Reduced Project Alternative would use large amounts of energy or fuel in a wasteful or inefficient manner and impacts in both conditions would be less than significant. Therefore, impact levels resulting from implementation of the Reduced Project Alternative would be consistent with those from the proposed Project.

Geology and Soils

Grading and development of the entire Project area would still occur under the Reduced Project Alternative, and therefore, impacts to geology and soils would be similar to those that would be generated from the proposed Project. Under both scenarios, additional persons and structures on the site would be subject to risks associated with seismic ground shaking and geologic hazards. Therefore, the Reduced Project Alternative would be required to meet the same regulatory requirements and implement the same mitigation measures for geologic recommendations as the proposed Project. Therefore, impacts to geology and soils would be less than significant with mitigation, which is the same as the proposed Project.

The Reduced Project Alternative would result in the same potential to adversely affect any paleontological resources on the Project site as the proposed Project, despite the reduction in development size. Like the proposed Project, impacts to paleontological resources would be reduced through the implementation of mitigation. Thus, like the proposed Project, potential impacts to paleontological resources would also be less than significant with mitigation incorporated. Therefore, impact levels resulting from implementation of the Reduced Project Alternative would be consistent with those from the proposed Project.

Greenhouse Gas Emissions

The Reduced Project Alternative is anticipated to reduce the duration of construction activities compared to the proposed Project, which in turn would result in less overall construction related GHG emissions. In addition, the Reduced Project Alternative would generate fewer emissions from operation in comparison to the Project because the hotel would not be developed, and 100,000 SF less commercial space would be developed compared to the proposed Project. The Reduced Project Alternative would also result in 2,722 fewer daily vehicular trips. Therefore, the Reduced Project Alternative would generate less GHG emissions than the proposed Project.

The net increase in GHG emissions that would be generated from the operation of the proposed Project is 25,931 $MTCO_2e$ per year without mitigation and 19,147 $MTCO_2e$ with mitigation (as shown in Table 5.5-4). Under the Reduced Project Alternative, the overall volume of GHG emissions would incrementally be reduced in comparison to the proposed Project. As the Reduced Project Alternative would implement a mixed-use development on an infill site within a High Quality Transit Area and TPA, the Reduced Project Alternative would also be consistent with the actions and strategies set forth in Appendix D of the 2022 CARB Scoping Plan and would be consistent with the 2022 CARB Scoping Plan and the state's GHG reduction goals. Also, like the Project, the Reduced Project Alternative would be required to implement mitigation measures in order to ensure consistency with applicable GHG reduction plans. Thus, like the proposed Project, potential impacts to GHG emissions would also be less than significant with mitigation incorporated. Therefore, impact levels resulting from implementation of the Reduced Project Alternative would be consistent with those from the proposed Project.

Hazards and Hazardous Materials

The demolition, site preparation, grading, drainage/utilities/subgrade, and paving phases that would be needed to develop the Reduced Project Alternative would include the entire site; and therefore, like the proposed Project it would require implementation of a soil management plan to detail procedures for removal and disposal of potentially contaminated soils during excavation and grading activities. As a result, this alternative would require implementation of Mitigation Measure HAZ-1 to ensure that the contaminated soils are removed and disposed of appropriately. In addition, Mitigation Measure HAZ-2 requires soil vapor assessments. These measures would be required for both the proposed Project and the Reduced Project Alternative to reduce potential impacts to a less than significant level.

Neither the Reduced Project Alternative nor the proposed Project would result in hazard impacts related to operations at John Wayne Airport (SNA), which is located 1.4 miles southeast of the Project site. The Project site is within the Airport Environs Land Use Plan (AELUP) Notification Area but is not the Airport Safety Zone or the Airport Impact Zone, and is outside of the 60 CNEL noise contours, as shown in Section 5.7, *Hazards and Hazardous Materials* (Figures 5.7-2 and 5.7-3). The Project site is located within the AELUP Notification area for SNA and FAR Part 77 Notification Imaginary Surface area (shown on Figure 5.6-1). Like the proposed Project, the Reduced Project Alternative would require AELUP notification. However, both the proposed Project and the Reduced Project Alternative would result in less than significant impacts related to SNA operational hazards. Overall, impacts related to hazards and hazardous materials from the Reduced Project Alternative would be less than significant with mitigation. Therefore, impact levels resulting from implementation of the Reduced Project Alternative would be consistent with those from the proposed Project.

Hydrology and Water Quality

The Reduced Project Alternative would result in similar construction impacts compared to the proposed Project because similar construction activities and soil disturbances would occur. As a result, the Reduced Project Alternative would implement standard BMPs through the City's standard permitting process to reduce potential impacts related to water quality during construction, which is similar to the proposed Project.

Therefore, both the Reduced Project Alternative and the proposed Project would have less than significant construction-related hydrology and water quality impacts.

The Reduced Project Alternative may result in a reduction of the total area of impervious surfaces compared to the proposed Project. Like the proposed Project, this alternative would introduce new sources of water pollutants from construction and operation activities. Additionally, this alternative would be required to include onsite drainage, LID, source control, site design, and treatment control BMPs that are similar to those included in the proposed Project that would reduce potential impacts to a less than significant level. Therefore, the Reduced Project Alternative would result in impacts to hydrology and water quality that are similar to those that would occur from the proposed Project. Overall, hydrology and water quality impacts would be less than significant. Therefore, impact levels resulting from implementation of the Reduced Project Alternative would be consistent with those from the proposed Project.

Land Use and Planning

The Reduced Project Alternative would implement a mix of land uses, including multi-family housing, senior living/continuum of care units, and retail commercial land uses on the Project site, and like the proposed Project would include a Specific Plan and would require a zoning map amendment to allow for the mix of uses throughout the Project site. Similar to the proposed Project, the Reduced Project Alternative would provide land uses that would integrate into the adjacent and nearby areas. However, the Reduced Project Alternative would provide fewer retail services for onsite residents and employees and would not include a hotel. The Reduced Project Alternative would implement the DC-5 land use designation and South Bristol Street Focus area to a lesser extent than the proposed Project. Therefore, the Reduced Project Alternative would implement many of the SCAG policies related to high-density, infill development, and improvement of the job/housing balance but to a lesser degree than the proposed Project. Overall, land use impacts from the Reduced Project Alterative would be less than significant. Therefore, impact levels resulting from implementation of the Reduced Project Alternative would be consistent with those from the proposed Project.

Noise

The Reduced Project Alternative would reduce the duration of construction activities compared to the proposed Project. However, this alternative would require implementation of GPU FEIR Mitigation Measure N-1 and Project-specific Mitigation Measure NOI-1 as it would result in construction throughout the Project site. With implementation of these measures, impacts related to construction noise from the Reduced Project Alternative would be less than significant. Thus, like the proposed Project construction noise and vibration impacts from the Reduced Project Alternative would be less than significant with implementation of mitigation.

The Reduced Project Alternative would generate noise sources from vehicular trips to and from the site and operation of onsite uses and mechanical equipment. However, the number of vehicular trips generated by this alternative would be less than those generated by the proposed Project; hence, traffic noise under this alternative would be incrementally less. Also, the number and type of mechanical systems needed for the Reduced Project Alternative would be similar to those used for the proposed Project. Thus, like the proposed Project, the operational noise levels generated under this alternative would be less than significant. Overall, noise impacts from the Reduced Project Alterative would be less than significant with implementation of mitigation. Therefore, impact levels resulting from implementation of the Reduced Project Alternative would be consistent with those from the proposed Project.

Population and Housing

The Reduced Project Alternative would reduce the commercial square footage by 100,000 SF and remove the hotel from the proposed development. Thus, this alternative would develop and operate 3,750 multi-family residential units, a 200-unit senior living/continuum of care facility, and 250,000 SF of retail and commercial uses.

This would result in the same number of residents as the proposed Project, which would result in 9,238 residents at full buildout based on the GPU FEIR person per household generation rate of 2.41. Based on the GPU generation factors of 1.0 employee per 500 SF of commercial space and the 2001 SCAG Employment Density Report of 1 employee per 1,351 SF for special care facilities, the Reduced Project Alternative would result in 667 employees, which would be a 425-employee reduction over the proposed Project's employment of 1,092 at full occupancy. The reduction in commercial space and elimination of the hotel under the Reduced Project Alternative scenario would be within SCAGs projected growth, like the proposed Project, but would provide fewer onsite jobs for a greater proportion of housing, which would result in a greater benefit to the jobs-housing balance. Thus, both the Reduced Project Alternative and the proposed Project would result in less than significant impacts related to population and housing. However, the Reduced Project Alternative would result in a reduced beneficial impact due to the provision of fewer onsite employment opportunities. Overall, population and housing impacts from the Reduced Project Alterative would be less than significant. Therefore, impact levels resulting from implementation of the Reduced Project Alternative would be consistent with those from the proposed Project.

Public Services

As described above, under the Reduced Project Alternative, the Project site would be redeveloped to provide 3,750 multi-family residential units, a 200-unit senior living/continuum of care facility, and 250,000 SF of commercial uses. Under this alternative scenario and the proposed Project, an administrative Police Department substation would be provided. Like the proposed Project, this alternative would also install security and fire protection systems, and because a new residential and employee population would exist on the Project site, additional calls for fire and police services would occur. Likewise, the residential population would generate students that would utilize local schools. Further, the residential population size associated with the Reduced Project Alternative would be the same as the proposed Project, and the Alternative would result in a similar demand for public services including fire, police, and schools. Because the proposed Project would result in less than significant impacts to public services, the smaller Reduced Project Alternative would also result in less than significant impacts. Therefore, impact levels resulting from implementation of the Reduced Project Alternative would be consistent with those from the proposed Project.

Parks and Recreation

The Reduced Project Alternative would include the same amount of onsite common open space and recreational amenities as the proposed Project. The 9,238 residents at full occupancy would utilize approximately 17.21 acres of private and common open space and recreational amenities, which would be the same as that provided by the proposed Project. As the population size associated with the Reduced Project Alternative would be the same as that associated with the proposed Project, the ratio of parkland to residents from the Project would remain the same. Therefore, the demand for offsite parks and recreation facilities would be the same as that resulting from the proposed Project.

Due to the existing deficiency in parkland in the City of Santa Ana and urban developed nature of the City, without sufficient available undeveloped sites or areas suitable for redevelopment for additional parkland, consistent with the findings for the proposed Project, the Reduced Project Alternative would result also result in significant and unavoidable impacts related to parks and recreation. Therefore, impact levels resulting from implementation of the Reduced Project Alternative would be consistent with those for the proposed Project.

Transportation

The Reduced Project Alternative would reduce the commercial square footage by 100,000 SF and remove the hotel from the proposed development. This would result in the development of 3,750 multi-family residential units, a 200-unit senior living/continuum of care facility, and 250,000 SF of commercial uses within a TPA and High Quality Transit Area. Given this alternative would be located within a TPA and would

be consistent with the 2020-2045 RTP/SCS land use and policies, it would screen out of a VMT analysis and could be presumed to result in less than significant impacts related to VMT. As shown on Table 6-2, the Reduced Project Alternative would generate 2,722 fewer daily vehicular trips than the proposed Project, resulting in 155 fewer AM peak hour trips and 187 fewer PM peak hour trips. This alternative would implement high-density, infill development, improve the job/housing balance, and reduce vehicle miles traveled, but not to the same extent as the proposed Project. In addition, this alternative would implement the same sidewalk, bicycle lane, and roadway improvements as the proposed Project. Therefore, impact levels resulting from implementation of the Reduced Project Alternative would be consistent with those from the proposed Project.

Table 6-2: Trip Comparison Reduced Project Alternative

		AM Peak Hour			PM Peak Hour		
	Daily	**In**	**Out**	**Total**	**In**	**Out**	**Total**
Phase 1 Reduced Project							
Multi-family Units (1,375 DU)	6,243	117	392	509	327	209	536
Continuing Care Retirement Community (200 U)	494	20	11	30	15	23	38
Shopping Center (>150k) (150 TSF)	5,552	78	48	126	245	265	510
Internal Capture[3]	-615	-11	-22	-33	-29	-26	-55
Non-Auto Trip Reduction (5% Daily, 5% AM, 5% PM)	-1,650	-9	-8	-17	-69	-86	-155
TDM Reduction (5% Daily, 5% AM, 5% PM)	-615	-11	-22	-33	-29	-26	-55
Pass-by Trips[2]	-400	-6	-4	-10	-57	-49	-106
Total Phase 1	**9,009**	**178**	**394**	**572**	**403**	**310**	**713**
Phase 2 Reduced Project							
Multi-family Units (856 DU)	3,886	73	244	317	204	130	334
Shopping Center (>150k) (65 TSF)	2,406	34	21	55	106	115	221
Internal Capture[3]	-800	-4	-5	-9	-36	-39	-75
Non-Auto Trip Reduction (5% Daily, 5% AM, 5% PM)	-314	-6	-13	-19	-15	-13	-28
TDM Reduction (5% Daily, 5% AM, 5% PM)	-314	-6	-13	-19	-15	-13	-28
Pass-by Trips[2]	-173	-3	-1	-4	-25	-21	-46
Total Phase 2	**4,691**	**88**	**233**	**321**	**219**	**159**	**378**
Phase 3 Reduced Project							
Multi-family Units (1,519 DU)	6896	129	433	562	361	231	592
Shopping Center (>150k) (35 TSF)	1295	18	11	29	57	62	119
Internal Capture[3]	-882	-4	-4	-8	-51	-31	-82
Non-Auto Trip Reduction (5% Daily, 5% AM, 5% PM)	-410	-7	-22	-29	-21	-15	-36
TDM Reduction (5% Daily, 5% AM, 5% PM)	-410	-7	-22	-29	-21	-15	-36
Pass-by Trips[2]	-93	-2	-1	-3	-13	-12	-25
Total Phase 3	**6,396**	**127**	**395**	**522**	**312**	**220**	**532**
Total Reduced Project Alt.	**20,096**	**393**	**1,022**	**1,415**	**934**	**689**	**1,623**
Total Existing Site Trips	15,490	217	134	351	540	582	1,122
Total Net Existing Zoning Alt.	***4,606***	***176***	***888***	***1,064***	***394***	***107***	***501***
Alternative and Project Comparison							
Proposed Project (Net)	7,328	267	952	1,219	476	212	688

Reduced Project Alternative (Net)	4,606	176	888	1,064	394	107	501
Increase/Decrease in Trips	**-2,722**	**-91**	**-64**	**-155**	**-82**	**-105**	**-187**

TSF = Thousand Square Feet
DU = Dwelling Unit
RM = Rooms
PCE = Passenger Car Equivalent
U = Units
[1]Trip rates from the Institute of Transportation Engineers, Trip Generation Manual, 11th Edition, 2021.
[2] Pass-by trips are made as intermediate stop on the way from one origin to a primary trip destination. Pass-by trips are attracted from traffic passing the site on adjacent streets, which contain direct access to the generator. For this analysis, the following pass-by reduction factors were used *Trip Generation, 11th Edition, Institute of Transportation Engineers (ITE), Washington, D.C. (2021)*:
Shopping Center: Daily – Estimated to be 10% / AM Peak Hour – Estimated to be 10% / PM Peak Hour – 29%
[3] Internal capture trip reduction is consistent with the *Trip Generation Handbook, 3rd Edition,* published by ITE (September 2017). Project trip generation was adjusted to account for internal capture between the residential and retail components of the Project.

Tribal Cultural Resources

The Reduced Project Alternative would require site preparation, grading, drainage/utilities/subgrade, which would disturb site soils to the same extent as the proposed Project; and therefore, this alternative would require implementation of Mitigation Measures TCR-1 through TCR-3 to reduce potential impacts related to unknown buried tribal cultural resources. Thus, impacts under both the Reduced Project Alternative and the proposed Project would be reduced to a less than significant level with incorporation of mitigation. Therefore, impact levels resulting from implementation of the Reduced Project Alternative would be consistent with those from the proposed Project.

Utilities and Service Systems

Like the proposed Project, the Reduced Project Alternative would generate additional demand related to water, wastewater, and solid waste. However, this alternative would result in a lower demand for domestic water supplies, wastewater treatment, and landfill capacity because no hotel rooms and a reduced commercial square footage would be developed. Consistent with the proposed Project, this alternative would include improvements to the existing stormwater drains in Sunflower Avenue and South Plaza Drive and improvements to the existing water mains in West MacArthur Boulevard, South Plaza Drive, Sunflower Avenue, and Bristol Street. Consistent with the proposed Project, the Reduced Project Alternative would install new onsite infrastructure that would connect to offsite infrastructure and impacts to utilities and service systems would be less than significant for both the proposed Project and the Reduced Project Alternative.

6.7.2 CONCLUSION

Ability to Reduce Impacts

The Reduced Project Alternative would have no hotel and 100,000 SF less commercial space, which would result in 2,722 fewer daily vehicular trips than the proposed Project. The reduction in vehicular emissions and consumer products from this alternative would reduce operational air quality impacts at Project buildout to a less than significant level with mitigation. However, significant and unavoidable impacts related to construction air quality emissions and Project and cumulative parkland deficiencies would continue to occur from implementation of this alternative. Additionally, the mitigation required for implementation of the proposed Project would continue to be required for the Reduced Project Alternative to reduce impacts related to air quality, cultural resources, geology and soils, greenhouse gas emissions, hazards and hazardous materials, noise, and tribal cultural resources to a less than significant level. Overall, although the volume of impacts would be less by the Reduced Project Alternative in comparison to the proposed Project, the Reduced Project Alternative would not eliminate all of the significant and unavoidable impacts of the proposed Project or eliminate the need for mitigation.

Ability to Achieve Project Objectives

As shown in Table 6-5, and listed below, the Reduced Project Alternative would meet the Project objectives, but not to the same extent as the proposed Project.

- The Reduced Project Alternative would meet the South Bristol Street Focus Area objectives, as new mixed use higher density would occur. However, it would not be met to the same extent as the Project because the alternative assumes no hotel and 100,000 SF less commercial space would be provided.
    - The Reduced Project Alternative would capitalize on the success of the South Coast Metro area to a lesser extent as less commercial space would be developed;
    - The Reduced Project Alternative would introduce a mixed-use urban village on the site; however, it would be reduced, as less commercial space and no hotel would be developed;
    - The Reduced Project Alternative would realize a less intense multi-story presence along the Bristol Street corridor; and
    - The Reduced Project Alternative would provide fewer mixed-use opportunities while protecting adjacent, established low density neighborhoods.
- The Reduced Project Alternative would adopt a zoning amendment which would allow for the flexible redevelopment of the underutilized Project site to provide a balanced mix of residential, retail, and hospitality uses in the South Bristol Street Focus Area that integrate into the existing urban systems and provide a safe and attractive environment for living and working, as encouraged by the GPU.
- The Reduced Project Alternative would transform an auto-oriented shopping plaza with large surface parking areas to a community which maximizes opportunities for onsite open space which can be accomplished through the provision of subsurface shared parking and intensity of land use permitted by the GPU, but not to the same extent as the proposed Project.
- The Reduced Project Alternative would develop high quality residential spaces that reflect modern lifestyles, while responding to the need for additional housing at a higher density in an area of the City planned for growth.
- The Reduced Project Alternative would develop a project with a mix of land uses that stimulate economic activity, commerce, and new housing opportunities in the South Bristol Street Focus Area; however, it would not do so to the same extent as the proposed Project.
- The Reduced Project Alternative would have less contribution to the local economy through new capital investment, the creation of new jobs, and the expansion of the tax base as it would result in a decrease in 100,000 SF of commercial space and provide no hotel.
- The Reduced Project Alternative would create a walkable mixed-use development to encourage and enhance pedestrian activity within the Specific Plan area and the local community.
- The Reduced Project Alternative would enhance non-vehicular activity by providing onsite and offsite pedestrian and bicycle facilities that link with existing facilities and transit services.
- The Reduced Project Alternative would improve existing infrastructure required to support the requirement of this alternative.
- The Reduced Project Alternative would provide a project that contributes to the creation of a vibrant urban core for the City and takes advantage of the site's location within the South Coast Metro area. The alternative would provide a project that contains vibrant and attractive community amenities, recreational and open space areas, and gathering spaces that are directly accessible to residents and the community.

- The Reduced Project Alternative would provide community benefits including publicly accessible open space onsite and locations for public community events, as well as streetscape improvements along the Project site frontages of MacArthur Boulevard, Bristol Street, Sunflower Avenue and South Plaza Drive.

Overall, the Reduced Project Alternative would meet the objectives of the proposed Project, but not to the same extent as the proposed Project.

6.8 ALTERNATIVE 3: BUILDOUT OF THE EXISTING ZONING ALTERNATIVE

Under this alternative, no zoning map amendment would occur, and the Project site would be built out according to the existing zoning designations, as shown on Figure 3-5 in Section 3.0, *Project Description*. The C2 zoning designation allows for general commercial development such as retail, professional offices, theaters, gyms, and restaurants, with heights not exceeding 35 feet at the FAR prescribed by the GPU land use designation of DC-5. The CR zoning designation allows for retail uses, professional offices, and single-family and multi-family residential. The CR designation sets a maximum height restriction of any building to equivalent to one-third of the distance between any point on the building at ground level to the nearest point of any land zoned exclusively for residential purposes. The CR designation defers to the GPU land use designation for density and FAR requirements.

Therefore, the Buildout of the Existing Zoning Alternative would include development of the 23.96-acre area north of Callen's Common with only commercial uses pursuant to the C2 zoning designation, which would result in approximately 782,774 SF at the maximum FAR of 0.75 with a building height of 35 feet (assumes only single-story buildings). This alternative would provide surface parking and would not develop Bristol Central Park in the northern portion of the site.

Under this alternative scenario, the 17.17-acre area south of Callen's Common would be redeveloped with commercial uses and mixed-uses pursuant to the CR zoning designation, which would result in approximately 250,000 SF of ground-floor commercial uses and office space, 250 hotel rooms, 200 senior living/ continuum of care units, and 1,375 multi-family units up to a maximum FAR of 5.0. Buildings at the northwestern corner of the CR zoned area would be a maximum of 50 feet, buildings at 200 feet from adjacent residential uses would be a maximum height of 100 feet. The buildings toward the southeast corner of the site would be a maximum of 25 stories. The Buildout of the Existing Zoning Alternative assumes approximately 6.1 acres of publicly accessible open space within Bristol Plaza and Bristol Green, the Greenlink, and programmable roads and parkways in the southern portion of the site. Parking within areas south of Callen's Common would be underground and open space within this area would be consistent with that provided by the proposed Project.

Overall, buildout of the Existing Zoning Alternative would develop the site with 682,774 SF more commercial space than proposed by the Project, totaling 1,032,774 SF of commercial uses (including an administrative Police Department substation), the same number of hotel rooms and senior living/continuum of care units as the proposed Project, and 2,375 fewer residential units for a total of 1,375 multi-family units.

6.8.1 ENVIRONMENTAL IMPACTS

Air Quality

The Buildout of the Existing Zoning Alternative would require a similar amount, type, and length of construction activities as the proposed Project, which in turn would result in similar construction-related air quality emissions. The Existing Zoning Alternative would also require subsurface excavation for underground parking south of Callen's Common, which would result in similar haul trips and NOx emissions as those resulting from construction of Phase 1 of the proposed Project. Also, the demolition, site preparation, grading, drainage/utilities/subgrade, and paving phases would include the entire site; and therefore, the alternative

would have the same level of maximum daily emissions. Thus, like the proposed Project, the Buildout of the Existing Zoning Alternative would result in significant and unavoidable impacts related to construction emissions.

However, operation of the Buildout of the Existing Zoning Alternative would result in substantially more daily vehicular trips than the proposed Project; and therefore, would result in a substantial increase in daily vehicular emissions than the proposed Project. As detailed in Table 6-3 below, the Buildout of the Existing Zoning Alternative would result in 9,541 more daily vehicular trips than the proposed Project and 16,869 more daily vehicular trips than the existing onsite land uses. This would result in an incremental increase in ROG and NOx emissions over those generated from the proposed Project. Thus, daily operational emissions from the Buildout of the Existing Zoning Alternative would exceed SCAQMD thresholds and would result in greater significant and unavoidable impacts to both criteria pollutants and consistency with the AQMP than the proposed Project.

Cultural Resources

Like the proposed Project, the Buildout of the Existing Zoning Alternative would not impact known historic resources. Similar to the proposed Project, the Buildout of the Existing Zoning Alternative would change the site by removing the existing buildings and would require grading and surface excavation to site soils to a similar extent as the proposed Project. As discussed in Section 5.2, *Cultural Resources*, the Project area is sensitive for archaeological deposits. However, with implementation of GPU FEIR Mitigation Measures CUL-4 and CUL-6 and Project-specific Mitigation Measures CR-1 and CR-2, impacts would be less than significant. Therefore, similar to the proposed Project, this alternative would require implementation of mitigation to reduce potential impacts to unknown archaeological resources onsite. Further, like the proposed Project, in the unanticipated event that human remains are found during construction activities compliance with California Health and Safety Code Section 7050.5 would ensure that human remains are treated with dignity and as specified by law and provide that the impact is less than significant. Overall, cultural resource impacts would be less than significant with mitigation and would result in the same impact as the proposed Project.

Energy

The Buildout of the Existing Zoning Alternative would redevelop the Project site to provide 1,032,774 SF of commercial retail uses, 1,375 multi-family units, 250 hotel rooms, and 200 senior living/continuum of care units that would require energy supplies. Like the proposed Project, the Buildout of the Existing Zoning Alternative would be developed in compliance with the CALGreen/Title 24 requirements related to energy and would not use large amounts of energy in a wasteful or inefficient manner. However, due to the increase in commercial square footage, it is likely that the Buildout of the Existing Zoning would result in a higher energy demand than the proposed Project. Overall, both the proposed Project and the Buildout of the Existing Land Use and Zoning Alternative would not use large amounts of energy or fuel in an inefficient or wasteful manner, and impacts would be less than significant. However, the Buildout of the Existing Zoning Alternative would likely result in a higher energy demand than the proposed Project.

Geology and Soils

Grading and development of the entire Project site would still occur under the Buildout of the Existing Zoning Alternative, and therefore, impacts to geology and soils would be similar to those that would be generated from the proposed Project. The introduction of additional persons and the construction of new structures would be subject to risks associated with seismic ground shaking and geologic hazards. Therefore, the Buildout of the Existing Zoning Alternative would be required to meet the same regulatory requirements and implement the same mitigation measures for geologic recommendations as the proposed Project. Therefore, impacts to geology and soils would be less than significant with mitigation, which is the same as the proposed Project.

The Buildout of the Existing Zoning Alternative would result in a similar potential to adversely affect any paleontological resources on the Project site as the proposed Project based on the similar extent of construction and ground disturbance. Like the proposed Project, impacts to paleontological resources would be reduced through the implementation of mitigation. Thus, like the proposed Project, potential impacts to paleontological resources would also be less than significant with mitigation incorporated. Overall, paleontological resource impacts would be less than significant with mitigation and would result in the same impact as the proposed Project.

Greenhouse Gas Emissions

The Buildout of the Existing Zoning Alternative would require similar number and types of construction equipment with a similar duration of construction activities when compared to the proposed Project, which in turn would result in similar construction related GHG emissions. However, operation of the Buildout of the Existing Zoning Alternative would result in an increase in daily vehicular trips when compared to the proposed Project; and therefore, would result in increased operational GHG emissions associated with vehicle use.

The net increase in GHG emissions that would be generated from the operation of the proposed Project is 25,931 $MTCO_2e$ per year without mitigation and 19,147 $MTCO_2e$ with mitigation (as shown in Table 5.5-4). As the Buildout of the Existing Zoning Alternative would implement a greatly increased amount of commercial uses and decreased number of multi-family residential uses, the Buildout of the Existing Zoning Alternative would be consistent with the actions and strategies set forth in Appendix D of the 2022 CARB Scoping Plan as it would implement mixed-uses at a density of over 20 dwelling units per acre in a TPA to promote VMT reduction, would promote transportation electrification, and would support building decarbonization. In addition, the Buildout of the Existing Zoning Alternative would be consistent with the City of Santa Ana CAP and GPU, which in turn means the Buildout of the Existing Zoning Alternative would contribute to the net decrease in emissions associated with buildout of the GPU. However, like the proposed Project, the Reduced Project Alternative would be required to implement mitigation measures in order to ensure consistency with applicable GHG reduction plans. Thus, consistent with the proposed Project, potential impacts to GHG emissions would also be less than significant with mitigation incorporated. Overall, GHG impacts would be less than significant with mitigation, and would result in the same level of impact as the proposed Project.

Hazards and Hazardous Materials

Construction activities including but not limited to demolition, site preparation, grading, and construction would include the entire site; and therefore, like the proposed Project, it would require implementation of a soil management plan to detail procedures for removal and disposal of potentially contaminated soils during excavation and grading activities. As a result, this alternative would require implementation of Mitigation Measure HAZ-1 to ensure that the contaminated soils are removed and disposed of appropriately. In addition, Mitigation Measure HAZ-2 that requires soil vapor assessment would be required for this alternative. These measures would be required for both the proposed Project and the Buildout of the Existing Zoning Alternative to reduce potential impacts to a less than significant level.

Both the Buildout of the Existing Zoning Alternative and the proposed Project would result in less than significant hazard impacts related to operations at John Wayne Airport (SNA). SNA is located 1.4 miles southeast of the Project site. The Project site is within the AELUP Notification Area but is not within the Airport Safety Zone or the Airport Impact Zone, and is outside of the 60 CNEL noise contours, as shown in Section 5.7, *Hazards and Hazardous Materials* (Figures 5.7-2 and 5.7-3). However, the Project site is located within the AELUP Notification area for SNA and FAR Part 77 Notification Imaginary Surface area (shown on Figure 5.6-1). Given the height of the Buildout of the Existing Zoning Alternative, it would require FAA notification.

The Buildout of the Existing Zoning Alternative would result in a smaller residential population onsite and decreased building heights in the northern half of the site. Both the proposed Project and the Buildout of the

Existing Zoning Alternative would not result in significant impacts related to SNA operational hazards. Therefore, impacts related to hazards and hazardous materials from the Buildout of the Existing Zoning Alternative would be less than significant with mitigation and would result in the same impact level as the proposed Project.

Hydrology and Water Quality

The Buildout of the Existing Zoning Alternative would result in similar construction impacts compared to the proposed Project because similar construction activities and soil disturbances would occur. As a result, the Buildout of the Existing Zoning Alternative would implement standard BMPs through the City's standard permitting process to reduce potential impacts related to water quality during construction, which is consistent with the proposed Project. Therefore, construction related hydrology and water quality impacts from the Buildout of the Existing Zoning Alternative would also be less than significant.

The Buildout of the Existing Zoning Alternative would result in an increase in impervious surfaces compared to the proposed Project as the northern portion of the site would not include development of Bristol Central Park, and single-story commercial uses with surface parking would be developed instead. However, like the proposed Project, this alternative would introduce new sources of water pollutants from construction and operation activities. Additionally, this alternative would be required to include onsite drainage, LID, source control, site design, and treatment control BMPs, consistent with the proposed Project. Therefore, the Buildout of the Existing Zoning Alternative would also result in less than significant impacts to hydrology and water quality; however impervious areas would increase.

Land Use and Planning

The Buildout of the Existing Zoning Alternative would implement the existing zoning designations for the Project site and would not require a zoning map amendment. Therefore, this alternative would be consistent with the SCAG RTP/SCS and zoning code. However, the Buildout of the Existing Zoning Alternative would not implement the vision set forth in the GPU for the South Bristol Street Focus Area as mixed-uses could not be developed north of Callen's Common.

Similar to the proposed Project, the Buildout of the Existing Zoning Alternative would not divide an established community and would provide land uses that would integrate into the planned development of these adjacent and nearby areas. However, the reduced development would provide fewer housing opportunities including for local employees and fewer retail services for onsite residents and employees working nearby. Therefore, the Buildout of the Existing Zoning Alternative would implement many of the SCAG policies related to high-density, infill development. However, the Buildout of the Existing Zoning Alternative would not result in an improvement of the job/housing balance in comparison to the proposed Project. Overall, land use impacts from the Buildout of the Existing Zoning Alternative would be less than significant and would result in the same impact level as the proposed Project.

Noise

The Buildout of the Existing Zoning Alternative would likely result in the same amount and length of construction activities compared to the proposed Project and would result in similar overall construction-related noise and vibration. However, this alternative would require implementation of GPU FEIR Mitigation Measure N-1 and Project-specific Mitigation Measure NOI-1 as it would result in construction throughout the Project site. With implementation of these measures, impacts related to construction noise from the Buildout of the Existing Zoning Alternative would be less than significant. Thus, like the proposed Project construction noise and vibration impacts would be less than significant with mitigation under the Buildout of the Existing Zoning Alternative.

The number of vehicular trips generated by this alternative would be greater than those generated by the proposed Project and more than double the trips from existing onsite land uses; hence, traffic noise under

this alternative would be greater and would result in a doubling of trips over existing conditions which would result in a 3 dBA increase. As such, traffic noise impacts from Buildout of the Existing Zoning Alternative would be significant and unavoidable. Also, the number and type of mechanical systems needed for the Buildout of the Existing Zoning Alternative would be similar to those used for the proposed Project. Overall, noise impacts from the Buildout of the Existing Zoning Alterative would be significant and unavoidable, and greater than the proposed Project.

Population and Housing

As described above, the Buildout of the Existing Zoning Alternative would redevelop the Project site to provide 1,032,774 SF of commercial uses, 1,375 multi-family units, 250 hotel rooms, and 200 senior living/continuum of care units. This would result in approximately 3,314 residents at full occupancy, which is 35.9 percent of the proposed Project's 9,238 residents at full occupancy. Thus, this alternative would result in 5,924 fewer residents. The development of hotel rooms, senior living/continuum of care units, and increased commercial square footage would result in 2,458 employees, which would be a 1,366-employee (125 percent) increase over the proposed Project's employment of 1,092 at full occupancy. The reduction of residential units, the same number of senior living/continuum of care units and hotel rooms, and increase of commercial space by the Buildout of the Existing Zoning Alternative would be within SCAGs projected growth, like the proposed Project, but would provide less housing in the TPA, High Quality Transit Area, and near employment; and would provide more employment and less benefit to the jobs-housing balance.

Both the Buildout of the Existing Zoning Alternative and the proposed Project would result in less than significant impacts related to population and housing; however, the Buildout of the Existing Zoning Alternative would result in a reduced beneficial impact by providing fewer multi-family housing units, where fewer employees can travel to local employment opportunities in the jobs-rich area. Reducing the number of residential units on the Project site and increasing the commercial square footage, as would be done by the Buildout of the Existing Zoning Alternative would not improve the jobs-housing balance; but would also not exceed forecasted population or employment growth for the City. Overall, population and housing impacts from the Buildout of the Existing Zoning Alternative would be less than significant, and this alternative would result in the same impact level as the proposed Project.

Public Services

As described above, the Buildout of the Existing Zoning Alternative would redevelop the Project site to provide 1,032,774 SF of commercial retail and restaurant uses (including an administrative Police Department substation to be located within the commercial use area), 1,375 multi-family units, 250 hotel rooms, and 200 senior living/continuum of care units. Like the proposed Project, this alternative would install security and fire protection systems, and because a new residential and employee population would exist on the Project site, additional calls for fire and police services would occur. Likewise, the residential population would generate students that would utilize local schools. As the population size associated with the Buildout of the Existing Zoning Alternative would be approximately 5,924 residents (64.1 percent) lower than the proposed Project, this alternative would result in a lower demand for public services, including fire, police, and schools. Both the proposed Project and this alternative would result in less than significant impacts to public services. Therefore, public services impacts from the Buildout of the Existing Zoning Alternative would be less than significant, and this alternative would result in the same impact level as the proposed Project.

Parks and Recreation

The Buildout of the Existing Zoning Alternative would provide a reduced amount of common open space as the 2.5-acre Bristol Central Park would not be developed. The Buildout of the Existing Zoning Alternative scenario assumes approximately 6.1 acres of publicly accessible open space within Bristol Plaza and Bristol Green, the Greenlink, and programmable roads and parkways in the southern portion of the site.

Approximately 200 SF of common/private open space per unit would be developed on the southern portion of the site, which would result in the development of 6.31 acres of common open space. The 3,314 residents at full occupancy would utilize the 6.31 acres of common/private open space area and reduced indoor amenities that would be provided by the Buildout of the Existing Zoning Alternative. As the population size associated with the Buildout of the Existing Zoning Alternative would be reduced by approximately 5,924 residents (64.1 percent), the Buildout of the Existing Zoning Alternative would result in a ratio of parkland to residents of 1.9. Therefore, the ratio of parkland to residents would increase in comparison to that resulting from the proposed Project. Also, because the number of residents would be less under this alternative and a greater ratio of parkland to residents would be provided, it may result in an incrementally lower demand for offsite parks and recreation facilities. However, like the proposed Project, the Buildout of the Existing Zoning Alternative would not provide enough parkland to meet the City's GPU policy to attain 3 acres per 1,000 residents and, due to the existing parkland deficiency and unavailability of sufficient acreage in the city to provide this amount of parkland in the City, impacts would remain significant and unavoidable. Overall, recreation impacts from the Buildout of the Existing Zoning Alternative would not avoid the significant and unavoidable impact of the proposed Project and would result in the same impact level as the proposed Project.

Transportation

As described in Section 5.13, *Transportation*, the proposed Project at full buildout would result in an increase of 7,328 average daily trips including 1,219 AM peak hour trips and 688 PM peak hour trips. The proposed Project would implement high-density, infill development that would improve the job/housing balance and thereby reduce the related vehicle miles traveled. The proposed Project is located near existing employment, services, and retail destinations, and is within a TPA, High Quality Transit Area, and adjacent to existing high quality bus stops, which would result in reduced dependency on cars and more closely link residents to jobs and services in comparison to a project of similar size and land without close access to employment, service, retail, and public transit. Given this Alternative would be located within a TPA and would be consistent with the 2020-2045 RTP/SCS land use and policies, it would screen out of a VMT analysis and could be presumed to result in less than significant impacts related to VMT. In addition, the proposed Project would include roadway, bike lane, and pedestrian access improvements, which would increase mobility.

The Buildout of the Existing Zoning Alternative would decrease the number of residential units, provide the same number of senior living/continuum of care units and hotel rooms, and would increase commercial space compared to the proposed Project. This would result in the development of 1,032,774 SF of commercial retail and restaurant uses, 1,375 multi-family units, 250 hotel rooms, and 200 senior living/continuum of care units. As shown on Table 6-3, when compared to the proposed Project, the Buildout of the Existing Zoning Alternative would generate 9,541 more net daily vehicular trips, 306 fewer AM peak hour trips, and 592 more PM peak hour trips. This alternative would implement high-density, infill development and reduce vehicle miles traveled but not to the same extent as the proposed Project. In addition, the Buildout of the Existing Zoning Alternative would not improve the jobs-housing ratio in the same manner as the proposed Project. Overall, impacts would be less than significant, and this alternative would result in the same level of impact as the proposed Project.

Table 6-3: Trip Comparison Buildout of Existing Zoning Alternative

		AM Peak Hour			PM Peak Hour		
	Daily	In	Out	Total	In	Out	Total
Phase 1 Existing Zoning							
Multi-family Units (1,375 DU)	6,243	117	391	508	327	209	536
Continuing Care Retirement Community (200 U)	494	20	10	30	15	23	38

Hotel (250 RM)	1,998	65	51	116	75	73	148
Shopping Center (>150k) (250 TSF)	9,253	130	80	210	408	442	850
Internal Capture[3]	-4,287	-5	-11	-16	-203	-157	-360
Non-Auto Trip Reduction (5% Daily, 5% AM, 5% PM)	-900	-17	-27	-44	-41	-38	-79
TDM Reduction (5% Daily, 5% AM, 5% PM)	-900	-17	-27	-44	-41	-38	-79
Pass-by Trips[2]	-754	-11	-8	-19	-99	-103	-202
Total Phase 1	**11,146**	**281**	**460**	**741**	**441**	**411**	**852**
Phase 2 Existing Zoning							
Shopping Center (>150k) (782.774 TSF)	28,970	408	250	658	1,277	1,384	2,661
Internal Capture[3]	-2,503	-8	-3	-11	-83	-129	-212
Non-Auto Trip Reduction (5% Daily, 5% AM, 5% PM)	-1,449	-20	-13	-33	-64	-69	-133
TDM Reduction (5% Daily, 5% AM, 5% PM)	-1,449	-20	-13	-33	-64	-69	-133
Pass-by Trips[2]	-2,357	-36	-22	-58	-309	-324	-633
Total Phase 2	**21,212**	**324**	**199**	**523**	**757**	**793**	**1,550**
Total Existing Zoning Alt.	**32,359**	**605**	**659**	**1,264**	**1,198**	**1,204**	**2,402**
Total Existing Site Trips	15,490	217	134	351	540	582	1,122
Total Net Existing Zoning Alt.	**16,869**	**388**	**525**	**913**	**658**	**622**	**1,280**
Alternative and Project Comparison							
Proposed Project (Net)	7,328	267	952	1,219	476	212	688
Existing Zoning Alternative (Net)	16,869	388	525	913	658	622	1,280
Increase/Decrease in Trips	**+9,541**	**+121**	**-427**	**-306**	**+182**	**+410**	**+592**

TSF = Thousand Square Feet
DU = Dwelling Unit
RM = Rooms
PCE = Passenger Car Equivalent
U = Units

[1]Trip rates from the Institute of Transportation Engineers, Trip Generation Manual, 11th Edition, 2021.

[2] Pass-by trips are made as intermediate stop on the way from one origin to a primary trip destination. Pass-by trips are attracted from traffic passing the site on adjacent streets, which contain direct access to the generator. For this analysis, the following pass-by reduction factors were used *Trip Generation, 11th Edition, Institute of Transportation Engineers (ITE), Washington, D.C. (2021)*:
Shopping Center: Daily – Estimated to be 10% / AM Peak Hour – Estimated to be 10% / PM Peak Hour – 29%

[3] Internal capture trip reduction is consistent with the *Trip Generation Handbook, 3rd Edition,* published by ITE (September 2017). Project trip generation was adjusted to account for internal capture between the residential, hotel, and retail components of the Project.

Tribal Cultural Resources

The Buildout of the Existing Zoning Alternative would require similar site preparation activities, which would disturb site soils to the same extent as the proposed Project; and therefore, this alternative would require implementation of Mitigation Measures TCR-1 through TCR-3 to reduce potential impacts related to unknown buried tribal cultural resources. Thus, impacts under both the Buildout of the Existing Zoning Alternative and the proposed Project would be reduced to a less than significant level with incorporation of mitigation. Overall, impacts to tribal cultural resources from the Buildout of the Existing Zoning Alternative would be less than significant with mitigation and would be the same level of impact as the proposed Project.

Utilities and Service Systems

The Buildout of the Existing Zoning Alternative would redevelop the Project site to provide a mix of land uses. Like the proposed Project, this alternative would include improvements to onsite and offsite utilities. Due

to the demand factors for commercial versus residential uses, the increase in commercial uses and decrease in residential uses would result in an overall decreased demand for utilities and service systems. Like the proposed Project, this alternative would likely require upgraded offsite water and the currently deficient stormwater drainage lines in surrounding streets. As such, the Buildout of the Existing Zoning Alternative would install new onsite infrastructure that would connect to surrounding offsite water, drainage, and wastewater infrastructure systems. Thus, impacts to utilities and service systems would be less than significant under both the proposed Project and the Buildout of the Existing Zoning Alternative.

6.8.2 CONCLUSION

Ability to Reduce Impacts

The Buildout of the Existing Zoning Alternative would redevelop the site with 1,032,774 SF of commercial retail and restaurant uses, 1,375 multi-family units, 250 hotel rooms, and 200 senior living/continuum of care units, which would result in 9,541 more daily vehicular trips than the proposed Project. The increase in vehicular trips from this alternative would increase the proposed Project's significant and unavoidable operational air quality impacts. As such, significant and unavoidable impacts related to air quality and parks and recreation would continue to occur from implementation of this alternative. Further, this alternative would result in significant and unavoidable impacts related to operational traffic noise. Additionally, the mitigation required for air quality, cultural resources, geology and soils, greenhouse gas emissions, hazards and hazardous materials, noise, and tribal cultural resources would continue to be required for the Buildout of the Existing Zoning Alternative.

Overall, the volume of impacts would be greater from the Buildout of the Existing Zoning Alternative in comparison to the proposed Project and the alternative would not eliminate any of the significant and unavoidable impacts of the proposed Project or eliminate the need for mitigation. Furthermore, the Buildout of the Existing Zoning Alternative would result in a reduced beneficial impact, as it would not provide as many multi-family units on the Project site; and therefore, would not improve the jobs-housing balance.

Ability to Achieve Project Objectives

As shown in Table 6-5, the Buildout of the Existing Zoning Alternative would meet the majority of the Project objectives, but not to the same extent as the proposed Project, as listed below:

- The Existing Zoning Alternative would meet the South Bristol Street Focus Area objectives, as new mixed use higher density would occur. However, it would not be met to the same extent as the Project, as 2,375 fewer housing units would be provided.
    - The Existing Zoning Alternative would capitalize on the success of the South Coast Metro area to a lesser extent as fewer housing units would be developed;
    - The Existing Zoning Alternative would introduce a mixed-use urban village on the site; however, it would be reduced, as fewer housing units would be developed;
    - The Existing Zoning Alternative would realize a less intense, reduced multi-story presence along the Bristol Street corridor; and
    - The Existing Zoning Alternative would provide fewer mixed-use opportunities while protecting adjacent, established low density neighborhoods.
- The Existing Zoning Alternative would not adopt a zoning amendment (Specific Plan), which would allow for the flexible redevelopment of the underutilized Project site to provide a balanced mix of residential, retail, and hospitality uses in the South Bristol Street Focus Area that integrate into the existing urban systems and provide a safe and attractive environment for living and working, as encouraged by the GPU.

- The Existing Zoning Alternative would not transform an auto-oriented shopping plaza with large surface parking areas north of Callen's Common to a community which maximizes opportunities for onsite open space which can be accomplished through the provision of subsurface shared parking and intensity of land use permitted by the GPU.
- The Existing Zoning Alternative would develop high quality residential spaces that reflect modern lifestyles, while responding to the need for additional housing at a higher density in an area of the City planned for growth, but not to the same extent as the proposed Project.
- The Existing Zoning Alternative would develop a project with a mix of land uses that stimulate economic activity, commerce, and new housing opportunities in the South Bristol Street Focus Area; however, it would not do so as envisioned by the proposed Project based on a different mix of land uses.
- The Existing Zoning Alternative would have less contribution to the local economy through new capital investment, the creation of new jobs, and the expansion of the tax base.
- The Existing Zoning Alternative would create a walkable mixed-use development to encourage and enhance pedestrian activity within the Project site area and the local community; however, it would not do so to the same extent as the proposed Project as the area north of Callen's Common would only be developed with commercial uses.
- The Existing Zoning Alternative would enhance non-vehicular activity by providing on-site and offsite pedestrian and bicycle facilities that link with existing facilities and transit services; however, it would not do so to the same extent as the proposed Project as the area north of Callen's Common would only be developed with commercial uses.
- The Existing Zoning Alternative would improve existing infrastructure to support Project site development.
- The Existing Zoning Alternative would provide a project that contributes to the creation of a vibrant urban core for the City and takes advantage of the site's location within the South Coast Metro area. The alternative would provide a project that contains vibrant and attractive community amenities, recreational and open space areas, and gathering spaces that are directly accessible to residents and the community. However, the alternative would not provide these benefits to the same extent as the proposed Project as the area north of Callen's Common would only be developed with commercial uses.
- The Existing Zoning Alternative would provide community benefits including publicly accessible open space onsite and locations for public community events, as well as streetscape improvements along the Project site frontages of MacArthur Boulevard, Bristol Street, Sunflower Avenue and South Plaza Drive; however, to a lesser extent as a reduction of park and recreation space would occur from this alternative.

Overall, the Existing Zoning Alternative would meet the objectives of the proposed Project, but not to the same extent as the proposed Project.

6.9 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires a lead agency to identify the "environmentally superior alternative" when significant environmental impacts result from a proposed Project. The Environmentally Superior Alternative for the proposed project would be the No Project/No Build Alternative. The No Project/No Build Alternative would avoid the significant and unavoidable air quality and recreation impacts of the proposed Project and all of the potential construction impacts, reduce many of the operational impacts, and would not be required to

implement the mitigation measures related to: air quality, cultural resources, geology and soils, greenhouse gas emissions, hazards and hazardous materials, noise, and tribal cultural resources.

However, the benefits of the proposed Project would also not be realized by the No Project/No Build Alternative. This alternative would not implement the General Plan DC-5 land use and South Bristol Street Focus Area objectives, provide improvements to offsite bicycle lanes, sidewalks, and water infrastructure, removal of potentially contaminated soils, provision of housing within TPAs and High Quality Transit Areas, improvements to the jobs/housing balance, and the potential to reduce vehicle miles traveled associated with providing an infill mixed-use development on the Project site. The No Project/No Build Alternative would not install CALGreen infrastructure or storm water filtration features in accordance with DAMP and LID design guidelines to filter and slow the volume and rate of runoff and would not include improved stormwater infrastructure or improvements to stormwater quality or reduction of drainage from the site.

Additionally, CEQA Guidelines Section 15126.6(3)(1) states:

> *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. (Emphasis added).*

Therefore, pursuant to CEQA, because the No Project/No Build Alternative has been identified as the Environmentally Superior Alternative, the Environmentally Superior Alternative among the other alternatives would be the Reduced Project Alternative, which would involve redevelopment of the site with no hotel and 100,000 SF less commercial development for 3,750 multi-family residential units, a 200-room senior housing facility, and 250,000 living/continuum of care SF of retail and restaurant commercial uses.

The Reduced Project Alternative would result in 250 fewer hotel rooms and 100,000 SF less commercial space which would result in 2,722 fewer daily vehicular trips than the proposed Project. The reduction in vehicular emissions and consumer products from this alternative would reduce operational air quality impacts at full buildout to a less than significant level with mitigation. However, significant and unavoidable impacts related to construction air quality emissions and parkland deficiencies would continue to occur from implementation of this alternative. Additionally, the mitigation required for implementation of the proposed Project would continue to be required for the Reduced Project Alternative to reduce impacts related to construction and operational air quality, cultural resources, geology and soils, greenhouse gas emissions, hazards and hazardous materials, noise, and tribal cultural resources to a less than significant level.

Overall, although the volume of impacts would be less by the Reduced Project Alternative in comparison to the proposed Project, the Reduced Project Alternative would not eliminate all of the significant and unavoidable impacts of the proposed Project or eliminate the need for mitigation. In addition, the Reduced Project Alternative would result in a reduced beneficial impact. Eliminating the hotel and providing less commercial space on the Project site would result in fewer opportunities for the creation of new jobs.

In addition, Reduced Project Alternative would meet the Project objectives but not to the same extent as the proposed Project. While the Reduced Project Alternative would result in additional employment, it would not result in the creation of new jobs to the same extent as the proposed Project. The Reduced Project Alternative would introduce mixed-uses to the Project site and would provide for new economic activity, but to a lesser extent as no hotel would be developed and less commercial square footage would be developed. Overall, this alternative would meet the objectives of the proposed Project, but not to the same extent as the proposed Project.

Table 6-4 provides, in summary format, a comparison between the level of impacts for each alternative and the proposed Project. In addition, Table 6-5 provides a comparison of the ability of each of the alternatives to meet the objectives of the proposed Project.

Table 6-4: Impact Comparison of the Proposed Project and Alternatives

	Proposed Project	**Alternative 1: No Project/No Build**	**Alternative 2: Reduced Project**	**Alternative 3: Buildout of the Existing Zoning**
Air Quality	Significant and unavoidable	Less than the proposed Project; but exceeds thresholds	Same as the proposed Project for construction, significant and unavoidable Less for operation, less than significant with mitigation	Greater than the Project, significant and unavoidable
Cultural Resources	Less than significant with mitigation	Less, no mitigation required	Same as proposed Project, less than significant with mitigation	Same as proposed Project, less than significant with mitigation
Energy	Less than significant	Same as proposed Project, less than significant	Less than significant impact; less energy demand	Less than significant impact; greater energy demand
Geology and Soils	Less than significant with mitigation	Less, less than significant, no mitigation required	Same as proposed Project, less than significant with mitigation	Same as proposed Project, less than significant with mitigation
Greenhouse Gas Emissions	Less than significant with mitigation	Less, less than significant, no mitigation required	Less than significant with mitigation; reduced emissions	Same; less than significant with mitigation
Hazards and Hazardous Materials	Less than significant with mitigation	Less, no mitigation required	Same as proposed Project; less than significant with mitigation	Same as proposed Project; less than significant with mitigation
Hydrology and Water Quality	Less than significant	Same as proposed Project, less than significant	Same as proposed Project, less than significant	Less than significant impact; increase impervious surfaces
Land Use and Planning	Less than significant	Same as proposed Project, less than significant	Same as proposed Project; less than significant	Same as proposed Project; less than significant
Noise	Less than significant with mitigation	Less, no mitigation required	Same as proposed Project; less than significant with mitigation	Greater than proposed Project; significant and unavoidable
Population and Housing	Less than significant	Same as proposed Project, less than significant	Same as proposed Project, less than significant	Same as proposed Project, less than significant
Public Services	Less than significant	Less, but also less than significant	Same as proposed Project, but also less than significant	Less, but also less than significant
Parks and Recreation	Significant and unavoidable Project	Less, no impact	Same as proposed Project, significant and unavoidable	Less, but also significant and unavoidable Project

	Proposed Project	Alternative 1: No Project/No Build	Alternative 2: Reduced Project	Alternative 3: Buildout of the Existing Zoning
	and cumulative impacts		Project and cumulative impacts	and cumulative impacts
Transportation	Less than significant	Less, but also less than significant	Same as the proposed Project, less than significant	Same as the proposed Project, less than significant
Tribal Cultural Resources	Less than significant with mitigation	Less, no impacts, no mitigation required	Same as proposed Project; less than significant with mitigation	Same as proposed Project; less than significant with mitigation
Utilities and Service Systems	Less than significant	Less, but also less than significant	Less, but also less than significant	Less, but also less than significant
Reduce Significant Impacts of the Project?		Yes	Yes	No
Areas of Reduced Impact Levels Compared to the Project		6	1, reduces operational air quality emissions; however, construction air quality emissions remain significant and unavoidable	0, and increases significant and unavoidable air quality impacts

Table 6-*5*: Comparison of the Proposed Project and Alternatives Ability to Meet Objectives

	Proposed Project	Alternative 1: No Project/No Build	Alternative 2: Reduced Project	Alternative 3: Buildout of the Existing Zoning
Implement the vision and objectives established in the City of Santa Ana General Plan for the South Bristol Street Focus Area to create a southern gateway to the City.	Yes	No	Yes, but not to the same extent as the proposed Project	Yes, but not to the same extent as the proposed Project
Capitalize on the success of the South Coast Metro area.	Yes	No	Yes, but not to the same extent as the proposed Project	Yes, but not to the same extent as the proposed Project
Introduce mixed-use urban villages and encourage experimental commercial uses that are more walkable, bike friendly, and transit oriented.	Yes	No	Yes, but not to the same extent as the proposed Project	Yes, but not to the same extent as the proposed Project
Realize an intense, multi-story presence along the Bristol Street corridor.	Yes	No	Yes	Yes, but not to the same extent as the proposed Project
Provide for mixed-use opportunities while protecting adjacent, established low density neighborhoods.	Yes	No	Yes, but not to the same extent as the proposed Project	Yes, but not to the same extent as the proposed Project
Allow for the flexible redevelopment of the underutilized Project site to provide a balanced mix of residential, retail, and hospitality uses in the South Bristol Street Focus Area that integrate into the existing urban	Yes	No	Yes	No

	Proposed Project	Alternative 1: No Project/No Build	Alternative 2: Reduced Project	Alternative 3: Buildout of the Existing Zoning
systems and provide a safe and attractive environment for living and working, as encouraged by the GPU.				
Transform an auto-oriented shopping plaza with large surface parking areas to a community which maximizes opportunities for onsite open space which can be accomplished through the provision of subsurface shared parking and intensity of land use permitted by the General Plan.	Yes	No	Yes, but not to the same extent as the proposed Project	Yes, but not to the same extent as the proposed Project
Develop high quality residential spaces that reflect modern lifestyles, while responding to the need for additional housing at a higher density in an area of the City planned for growth.	Yes	No	Yes	Yes, but not to the same extent as the proposed Project
Develop a project with a mix of land uses that stimulate economic activity, commerce, and new housing opportunities in the South Bristol Street Focus Area.	Yes	No	Yes, but not to the same extent as the proposed Project	Yes, but not to the same extent as the proposed Project
Have a positive contribution to the local economy through new capital investment, the creation of new jobs, and the expansion of the tax base.	Yes	No	Yes, but not to the same extent as the proposed Project	Yes, but not to the same extent as the proposed Project
Create a walkable mixed-use development to encourage and enhance pedestrian activity within the Specific Plan area and the local community.	Yes	No	Yes	Yes, but not to the same extent as the proposed Project
Enhance non-vehicular activity by providing on-site and offsite pedestrian and bicycle facilities that link with existing facilities and transit services.	Yes	No	Yes	Yes, but not to the same extent as the proposed Project
Improve existing infrastructure to support the Related Bristol Specific Plan consistent with the General Plan conditions.	Yes	No	Yes	Yes, but not to the same extent as the proposed Project
Provide a project that contributes to the creation of a vibrant urban core for the City and takes advantage of the site's location within the South Coast Metro area. Provide a project that contains vibrant and attractive community amenities, recreational and open space areas, and gathering spaces that are directly accessible to residents and the community.	Yes	No	Yes	Yes, but not to the same extent as the proposed Project
Provide community benefits commensurate with the Specific Plan development proposal including public open space onsite and locations for public community events, as well as streetscape improvements along the Project site frontages of MacArthur Boulevard, Bristol Street, Sunflower Avenue and South Plaza Drive.	Yes	No	Yes	Yes, but not to the same extent as the proposed Project