

5.0 ALTERNATIVES

5.1 INTRODUCTION

The California Environmental Quality Act (CEQA) requires that an Environmental Impact Report (EIR) include a discussion of reasonable project alternatives that would “feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any significant effects of the project, and evaluate the comparative merits of the alternatives” (*State CEQA Guidelines*, Section 15126.6). This chapter identifies potential alternatives to the Tirador Residential Development Project (proposed project), located in the City of San Juan Capistrano (City), evaluates the potential impacts of each alternative, and compares the potential impacts of each alternative against the project’s impacts, as required by CEQA.

Key provisions of the *State CEQA Guidelines* on alternatives (Section 15126.6[b] through [f]) are summarized below to explain the foundation and legal requirements for the alternatives analysis in the EIR:

- The discussion of alternatives shall focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives or would be more costly (15126.6[b]).
- The specific alternative of “no project” shall also be evaluated along with its impact (15126.6[e][1]). The “no project” analysis shall discuss the existing conditions at the time the Notice of Preparation is published and at the time the environmental analysis is commenced, as well as what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. If the environmentally superior alternative is the “no project” alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives (15126.6[e][2]).
- The range of alternatives required in an EIR is governed by the “rule of reason” that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision-making. Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site (or the site is already owned by the proponent) (15126.6[f]).
- For alternative locations, only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR (15126.6[f][2][A]).

- If the lead agency concludes that no feasible alternative locations exist, it must disclose the reasons for this conclusion and should include the reasons in the EIR. For example, in some cases there may be no feasible alternative locations for a geothermal plant or mining project, which must be in close proximity to natural resources at a given location (15126.6[f][2][B]).
- An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative (15126.6[f][3]).

Pursuant to the guidelines stated above, alternatives to the proposed project are considered and evaluated in this EIR. These alternatives were developed in the course of project planning and environmental review. The discussion in this section provides:

1. A description and analysis of impacts for each of the alternatives considered;
2. Comparative analysis of each alternative that focuses on the potentially significant unavoidable environmental impacts of the proposed project, e.g., agricultural and greenhouse gas (GHG) emissions (the purpose of this analysis is to determine whether alternatives are capable of eliminating or reducing the significant environmental impacts of the project to a less than significant level); and
3. Conclusions regarding the alternative's: (1) ability to avoid or substantially lessen the significant unavoidable impacts of the project; (2) ability to attain the project objectives (as stated below); and (3) merits compared to the merits of the proposed project.

5.2 PROPOSED PROJECT

5.2.1 Project Characteristics

As described in Chapter 3.0, Project Description, the proposed project would involve the construction of a 132-unit residential development consisting of 43 two-story detached single-family units and 89 three-story attached townhome units on an approximately 16.1-acre site. Amenities provided throughout the residential development would include a gathering area with barbecues, seating, a shade structure, an open play turf area, a tot lot, play equipment, a dog waste station, trash receptacles, and a multi-purpose pedestrian, bicycle, and equestrian trail with additional amenities.

5.2.2 Project Objectives

Each alternative is analyzed to determine whether it achieves the basic objectives of the proposed project. The underlying purpose of the proposed project would be to provide a high quality residential development with recreational amenities. As discussed in Section 3.3.10, Project Objectives, of Chapter 3.0, Project Description, of this EIR, the following project objectives have been established to aid decision-makers in their review of the proposed project and its associated environmental impacts:

1. Develop a residential development to increase the City's market-rate and affordable housing stock.

2. Develop a project that balances the development potential of the project site with environmental considerations.
3. Revitalize the vacant site with a well-designed and landscaped residential project that is compatible with the surrounding community.
4. Increase the City's tax base by generating revenue for the City through property taxes.
5. Provide non-traditional home ownership opportunities through the provision of townhomes and affordable units.
6. Provide recreational opportunities for the surrounding community with incorporation of a multi-purpose pedestrian, bicycle, and equestrian trail and associated amenities.
7. Dedicate approximately 5.6 acres of the project site adjacent to the San Juan Creek as a conservation area.
8. Locate housing adjacent to available infrastructure to serve the project.
9. Implement the City's General Plan.

5.2.3 Significant Unavoidable Impacts of the Proposed Project

As described in Chapter 4.0, Existing Environmental Setting, Environmental Analysis, Impacts, and Mitigation Measures, after implementation of mitigation, the proposed project would not result in significant unavoidable adverse impacts related to any topic analyzed in this EIR including aesthetics; air quality; biological resources; cultural resources; energy; geology and soils; greenhouse gas emissions; hydrology and water quality; land use and planning; noise; transportation; or tribal cultural resources. In addition, as described in Chapter 2.0, Introduction, the project would have no impacts related to agriculture and forestry resources, hazards and hazardous materials; mineral resources, population and housing, public services, recreation, utilities and service systems, or wildfire.

Because the proposed project as analyzed in this EIR would not result in significant adverse unavoidable impacts, the following discussion focuses on alternatives that would reduce or avoid the potentially significant impacts, which have been mitigated to a less than significant level, as identified in Chapter 4.0.

5.3 ALTERNATIVES INITIALLY CONSIDERED BUT REJECTED FROM FURTHER CONSIDERATION

Section 15126.6(c) of the *State CEQA Guidelines* suggests that EIRs identify any alternatives that were considered by the Lead Agency but were rejected during the scoping process and briefly explain the reasons underlying the Lead Agency's determination. In evaluating an appropriate range of alternatives to the proposed project, a number of alternatives were considered and rejected for differing reasons by the City.

The following is a discussion of the development alternatives considered during the environmental review process and the reasons they were not selected for detailed analysis in this Draft EIR.

5.3.1 Alternative Project Sites

CEQA requires that the discussion of alternatives focuses on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant impacts of the project. The key question and first step in the analysis is whether any of the significant impacts of the project would be avoided or substantially lessened by relocating the project. Only locations that would avoid or substantially lessen any of the significant impacts of the project need be considered for inclusion in the EIR (*State CEQA Guidelines*, Section 15126.6[f][2][A]). Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, General Plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the Project Applicant can reasonably acquire, control, or otherwise have access to the alternative site (*State CEQA Guidelines*, Section 15126.6[f][1]). If it is determined that no feasible alternative locations exist, the EIR must disclose the reasons for this conclusion (*State CEQA Guidelines*, Section 15126.6[f][2][B]).

The City has reviewed the inventory of vacant properties that have the potential to support a residential development. Due to the developed nature of the City, there are no available properties that are of sufficient size to accommodate the proposed project, which requires approximately 16 acres of developable land. The City is currently processing development applications on the few vacant or underdeveloped properties in the City that are large enough to potentially accommodate the proposed project (i.e., the proposed Farm Specific Plan property on Del Obispo Street north of Camino Del Avion and the proposed Ganahl Lumber Project on Stonehill Drive near the intersection with Camino Capistrano). Additionally, other sites in the City designated by the General Plan Land Use Element for Very High Density Residential land use are less than 4 acres in size and are either currently developed or the City has recently approved development applications (i.e., the existing City Hall complex on a 2.5-acre site at 32400 Paseo Adelanto and a 75-unit senior apartment complex on a 3.85-acre site at the northwest corner of Junipero Serra Road and Camino Capistrano). As stated previously, an alternative site smaller than the project site would result in the elimination of affordable units because they would no longer be economically feasible to construct. As such, this alternative would conflict with Project Objectives 1 and 5, which involve developing a residential development to increase the City's affordable housing stock and providing non-traditional home ownership opportunities through the provision of affordable units, respectively.

The only site within the City that is both adequately sized to accommodate the project and which also has a General Plan land use designation of Very High Density Residential is the Oso Ranch Planned Community, located along Camino Capistrano at the northwestern-most portion of the City. The Oso Ranch Planned Community is an approximately 55-acre site designated in the General Plan Land Use Element as Public Institutional, Very High Density Residential, and Medium Density Residential. The Oso Ranch site access is restricted by Trabuco Creek, and some of the acreage is within the flood zone, making large portions of the site undevelopable. The Oso Ranch Planned Community regulations establish that 30 percent of the site is to be reserved for Very High Density Residential land use. However, since only 31.2 acres of the site is developable, approximately 9.4 acres are allocated for Very High Density Residential land use. This site, identified as Assessor's Parcel Number (APN) 121-070-57, is entitled to be developed at a density of 30 dwelling units per

acre, or 279 units. The 219 affordable units designated in the City's General Plan Housing Element which are no longer able to be accommodated with the proposed development on the project site can be accommodated on this alternative site. Chapter 3.0, Project Description, includes more details regarding the alternative site designation in the City's General Plan Housing Element. However, this is not a feasible alternative site for the reasons stated below.

The Project Applicant does not own or control any other property within the City that would be suitable for development of the proposed project. Moreover, the Project Applicant cannot reasonably acquire or control an alternative site in the City in a timely fashion that would allow for the implementation of a project with similar uses and square footage.

In addition, development of the proposed project at an alternative site in the City (assuming one was available) could potentially result in some environmental impacts that would be similar to or greater than those of the proposed project's environmental impacts, depending on the proximity of the alternate site to sensitive uses or a circulation system where the existing level of service and roadway capacity could accommodate the proposed uses.

The development of the proposed project on an alternative site in the City would also fail to meet several of the project objectives. Moving the proposed project would not result in a balanced development potential of the project site with environmental considerations (Project Objective 2), nor would it revitalize the vacant project site (Project Objective 3). Moving the proposed project to another part of San Juan Capistrano would not provide the same level of recreational opportunities for the surrounding community through the incorporation of a multi-purpose pedestrian, bicycle, and equestrian trail and associated amenities (Project Objective 6) because the improvements to an equestrian trail on an alternate site would not be located as close to the Ortega Equestrian Center, which is adjacent to the project site. Furthermore, the development of the proposed project on an alternative site would not include the permanent dedication of approximately 5.6 acres of the project site adjacent to the San Juan Creek as a conservation area (Project Objective 7), and potentially, this area could be developed under a future project. For these reasons, no alternative site is considered feasible because no suitable alternative site is available that would achieve the underlying purpose and objectives of the project, and an alternative site would likely not reduce environmental impacts as compared to the development of the proposed project on the project site. Therefore, no alternative locations to undertake the proposed project are analyzed in the Draft EIR. This alternative was rejected from further consideration.

5.4 ALTERNATIVES UNDER CONSIDERATION

Section 21100 of the Public Resources Code (PRC) and Section 15126 of the *State CEQA Guidelines* require an EIR to identify and discuss a No Project Alternative and a reasonable range of alternatives to the proposed project that would feasibly attain most of the basic objectives of the project and would avoid or substantially lessen any of the significant environmental impacts. Based on the criteria listed above, the following two alternatives have been determined to represent a reasonable range of alternatives that have the potential to feasibly attain most of the basic objectives of the proposed project but that may avoid or substantially lessen any of the significant impacts of the proposed project. Therefore, the alternatives considered in this EIR include the following:

- **Alternative 1: No Project/No Development.** This alternative would involve no changes to the existing land uses and conditions on the project site. No development would occur on the project site and the existing condition of the site as vacant and undeveloped would not change.
- **Alternative 2: Reduced Project Alternative.** This alternative would include a reduced intensity residential development consisting of 100 dwelling units. The Reduced Project Alternative would include 32 two-story detached single-family units and 68 three-story attached townhome units, which is the same ratio of detached single-family and attached townhomes as the proposed project. This alternative would include 11 affordable units, which is just over 10 percent of the total units, and a similar percentage as provided by the proposed project.

For the purpose of this analysis, it is assumed that the alternatives would comply with applicable federal, State, and local regulations, policies, and ordinances. Table 5.A, below, provides a summary description of each alternative and the basis for its selection for inclusion in the EIR. The No Project Alternative (Alternative 1) and the Reduced Project Alternative (Alternative 2) are evaluated below.

In accordance with *State CEQA Guidelines* Section 15126.6(d), each alternative is evaluated in sufficient detail to determine whether the overall environmental impacts would be less than, similar to, or greater than the corresponding impacts of the proposed project. Furthermore, each alternative is evaluated to determine the extent to which the project objectives, identified in Chapter 3.0, of this Draft EIR, would be attained by the alternative. The evaluation of each of the alternatives follows the process described below:

1. The environmental impacts of the alternative are determined for each environmental issue area analyzed in Chapter 4.0, of this Draft EIR, assuming that each alternative would implement similar regulatory compliance measures, project design features, and mitigation measures as the proposed project.
2. Post-mitigation significant and non-significant environmental impacts of the alternative and the proposed project are compared for each environmental issue area as follows:
 - a. **Less:** Where the impact of the alternative would be clearly less adverse or more beneficial than the impact of the proposed project, the comparative impact is said to be “less.”
 - b. **Greater:** Where the impact of the alternative would clearly be more adverse or less beneficial than the proposed project, the comparative impact is said to be “greater.”
 - c. **Similar:** Where the impact of the alternative and the proposed project would be roughly equivalent, the comparative impact is said to be “similar.”
3. The comparative analysis of the impacts is followed by a general discussion of the extent to which the project objectives are attained by the alternative.

Table 5.A: Summary of Project Alternatives

Alternative	Description	Basis for Selection and Summary Analysis
Proposed Project	<ul style="list-style-type: none"> • Approximately 16.1-acre project site • Land use designation of Planned Community, General Open Space, and Community Park • Zoning Designation of Planned Community District • Undeveloped and vacant in the existing condition • Construction of a 132-unit residential development consisting of 43 two-story detached single-family units and 89 three-story attached townhome units • Of the 89 townhomes, 14 would be designated affordable units restricted to households of moderate income • Amenities provided throughout the residential development include a gathering area with barbeques, seating, and a shade structure, an open play turf area, a tot lot, play equipment, a dog waste station, and trash receptacles • Construction of 20-foot wide multi-purpose pedestrian, bicycle, and equestrian trail and associated amenities • Dedication of approximately 5.6 acres of the project site adjacent to the San Juan Creek as a conservation area 	<ul style="list-style-type: none"> • Preferred site within the City under the control of the Project Applicant • Meets all Project Objectives • Refer to Chapters 3.0 and 4.0 of this Draft EIR • No significant and unavoidable impacts after incorporation of mitigation measures
Alternative 1: No Project/No Development	<ul style="list-style-type: none"> • Approximately 16.1-acre project site • Land use designation of Planned Community, General Open Space, and Community Park • Zoning Designation of Planned Community District • Undeveloped and vacant in the existing condition • Continued underutilization of the vacant project site • No grading or construction on the project site 	<ul style="list-style-type: none"> • Required by CEQA • Inconsistent with all Project Objectives
Alternative 2: Reduced Project Alternative	<ul style="list-style-type: none"> • Approximately 16.1-acre project site • Land use designation of Planned Community, General Open Space, and Community Park • Zoning Designation of Planned Community District • Undeveloped and vacant in the existing condition • Construction of a 100-unit residential development consisting of 32 two-story detached single-family units and 68 three-story attached townhome units • Of the 68 townhomes, 11 would be designated affordable units restricted to households of moderate income • Amenities provided throughout the residential development include a gathering area with barbeques, seating, and a shade structure, an open play turf area, a tot lot, play equipment, a dog waste station, and trash receptacles • Construction of 20-foot-wide multi-purpose pedestrian, bicycle, and equestrian trail and associated amenities • Dedication of approximately 4.2 acres of the project site adjacent to the San Juan Creek as a conservation area 	<ul style="list-style-type: none"> • Reduced physical environmental impacts • Inconsistent with some of the Project Objectives

CEQA = California Environmental Quality Act
EIR = Environmental Impact Report

5.4.1 Alternative 1: No Project/No Development Alternative

Description. Consistent with Section 15126.6 of the *State CEQA Guidelines*, the No Project/No Development Alternative assumes the existing land uses and condition of the project site at the time the NOP was published (November 7, 2019) would continue to exist without any changes. The setting of the project site at the time the NOP was published is described throughout Chapter 4.0 of this EIR with respect to individual environmental issues, and forms the baseline of the impact assessment of the proposed project. The No Project/No Development Alternative represents the environmental conditions that would exist if no new development of any kind were to occur on the project site. The No Project/No Development Alternative anticipates that the project site would remain primarily as a vacant and undeveloped lot, with no improvements to the existing condition of the San Juan Creek Trail. Although there would be no improvements implemented on the project site as proposed by the project, the General Plan land use designation of Planned Community, General Open Space, and Community Park, and the Zoning Designation of Planned Community District, would still be applicable to the project site. Under those designations, future residential development at density of up to 30 du/acre, or 483 units, could occur. The No Project/No Development Alternative would allow existing conditions on the project site to remain unchanged.

Environmental Analysis. The project site is currently undeveloped and vacant. In its existing condition, the San Juan Creek Trail is publicly accessible from the project site; the trail begins at the intersection of Calle Arroyo and Paseo Tirador, traverses the project site in a southwest direction, and terminates at the Pacific Ocean in the City of Dana Point. This alternative assumes that the existing use of the San Juan Creek Trail would continue to operate into the future. It is assumed that no improvements or new construction would occur at the project site.

Under the No Project Alternative, the visual setting of the project site would not be altered. No new air pollutant emissions or greenhouse gas (GHG) emissions would be generated by short-term construction since no new construction is proposed, and new residents and the residential development would not be present to result in operational emissions. There would be no impacts related to biological resources or geology and soils because the project site would remain undisturbed and undeveloped. Unknown potential archaeological, paleontological, and tribal cultural resources would remain undisturbed. No changes in energy usage would result because the site would remain undeveloped. There would be no change to the project site with regard to the percentage of the site that would remain pervious or the volume of runoff during a storm event and runoff treatment from best management practices (BMPs) that are included in the proposed project. The project site would remain designated for very-low income affordable housing units in the City's General Plan Housing Element, and the site's use would be consistent with the General Plan and zoning documents. No short-term construction noise impacts or long-term operational noise impacts would occur to the surrounding area. Further, no additional vehicle trips would be generated by construction or operations at the site.

Overview of Potential Impact/Comparison to Proposed Project. The No Project Alternative would not result in any physical changes to the project site and there would not be a potential for new environmental impacts to occur. Overall, the No Project Alternative would result in fewer environmental impacts than the proposed project because no construction or development would take place.

Project Objectives. The No Project Alternative would not achieve any of the Project Objectives. Without the proposed project, the project site would not be developed with a 132-unit residential development (including 14 affordable units), amenities, and a multi-purpose pedestrian, bicycle, and equestrian trail. In addition, although the project site would remain undeveloped, a 5.6 acre portion of the project site would not be dedicated as a conservation area. The No Project/No Development Alternative would not do any of the following: develop a residential development to increase the City's market-rate and affordable housing stock (Project Objective 1); develop a project that balances the development potential of the project site with environmental considerations (Project Objective 2); revitalize the vacant site with a well-designed and landscaped residential project that is compatible with the surrounding community (Project Objective 3); increase the City's tax base by generating revenue for the City through property taxes (Project Objective 4); provide non-traditional home ownership opportunities through the provision of townhomes and affordable units (Project Objective 5); provide recreational opportunities for the surrounding community with incorporation of a multi-purpose pedestrian, bicycle, and equestrian trail and associated amenities (Project Objective 6); dedicate approximately 5.6 acres of the project site adjacent to the San Juan Creek as a conservation area (Project Objective 7); locate housing adjacent to available infrastructure to serve the project (Project Objective 8); nor would it implement the City's General Plan (Project Objective 9).

5.4.2 Alternative 2: Reduced Project Alternative

Description. Alternative 2 would include a reduced intensity residential development consisting of 100 dwelling units. The Reduced Project Alternative would include 32 two-story detached single-family units and 68 three-story attached townhome units, which is the same ratio of detached single-family and attached townhomes as the proposed project. This alternative would include 11 affordable units, which is 11 percent of the total units, and a similar percentage of affordable units as provided by the proposed project. The project site would be divided by unit type, with single-family units and townhomes constructed on the eastern and western portions of the site, respectively, similar to the proposed project. The residential density of Alternative 2 would total 6.2 du/ac, which is substantially lower than the maximum density of 30.0 du/ac allowed on the site, and lower than the density (8.2 du/acre) proposed under the Proposed Project.

Alternative 2 would also include a 20-foot (ft)-wide multi-purpose pedestrian, bicycle, and equestrian trail along the project site's southern boundary. Fewer amenities would be proposed with Alternative 2, although a gathering area with barbeques, seating, a tot lot, an equestrian hitching post, bicycle racks, drinking fountains, and trash receptacles would be provided within the development. This alternative would dedicate approximately 4.2 acres of the project site adjacent to the San Juan Creek as a conservation area, which is a smaller acreage dedicated than under the proposed project.

For purposes of the alternative analysis, it is assumed that the architectural design, landscaping, and lighting characteristics for Alternative 2 would be similar to the Proposed Project.

This alternative would be consistent with the site's General Plan land use designation of Planned Community. There are also small portions of the project site designated as General Open Space and Community Park. The land uses proposed under Alternative 2 would be consistent with the existing land use designations. The project site is zoned as a Planned Community District associated with the

adopted Ortega Planned Community Comprehensive Development Plan (CDP 78-01). Alternative 2 would also be consistent with the existing zoning. Therefore, no General Plan Amendment (GPA) or zoning changes would be required to implement Alternative 2.

Environmental Analysis. As stated previously, the project site is currently undeveloped and vacant. The following sections describe potential environmental impacts that would occur upon implementation of Alternative 2, Reduced Project Alternative.

Aesthetics. Under Alternative 2, the visual setting of the project site would be altered to a similar, although lesser, degree as compared to the proposed project. Similar to the proposed project, Alternative 2 would have less than significant impacts related to scenic resources, light, glare, and the existing visual character of the project site and its surroundings. Under Alternative 2, 11 of the townhomes, or approximately 11 percent of the total units, would be designated affordable and would allow the Project Applicant to apply for a concession and waivers of development standards. Upon approval of the concession and waivers requested as part of the project, both the proposed project and Alternative 2 would be consistent with all applicable General Plan and zoning regulations governing aesthetics and scenic quality on the property. Additionally, both the proposed project and Alternative 2 would have no impact associated with State Scenic Highways because no official State Scenic Highways are located in the vicinity of the project. Overall, impacts to aesthetics under Alternative 2 are reduced, but similar to impacts associated with the proposed project. No mitigation is required.

Because impacts related to aesthetics for Alternative 2 would be similar to those associated with the proposed project, cumulative impacts would also be less than cumulatively significant, and no mitigation would be required.

Air Quality. Due to the reduced size of the project, it can be assumed that construction-related criteria air pollutant emissions generated under Alternative 2 would be similar, but slightly less, than emissions expected under the proposed project. Further, Regulatory Compliance Measures AQ-1 through AQ-3 would be applicable to Alternative 2 and would ensure compliance with SCAQMD standard conditions, including Rule 402 (Nuisance) to control nuisance emissions, Rule 403 (Fugitive Dust) to control fugitive dust, and Rule 1113 (Architectural Coatings) to control VOC emissions from paint. Overall, construction impacts related to air quality would be less than significant and would be similar, but slightly less than impacts generated by the proposed project.

Under Alternative 2, fewer new residents and a reduced residential development would result in reduced operational emissions as compared to the proposed project. Alternative 2 would result in fewer operational criteria air pollutants than the proposed project. As such, because Alternative 2 results in fewer operational emissions as compared to the proposed project, Alternative 2 would not exceed the significance thresholds of criteria pollutants for which the project region is nonattainment under the CAAQS or NAAQS. Further, both the proposed project and Alternative 2 are not anticipated to produce emissions that could lead to objectionable odors affecting a substantial number of people because implementation of both projects involves the development of a residential community, which do not typically produce odorous emissions. Overall, operational impacts related to air quality would be less than significant and would be less than impacts generated by the proposed project.

Alternative 2, similar to the proposed project, is consistent with the current General Plan land use designations on the project site and would not exceed the growth assumptions in the AQMP, is consistent with land use planning strategies set forth by SCAQMD, and includes implementation of all feasible air quality rules to reduce emissions. Therefore, Alternative 2, similar to the proposed project, would not conflict with or obstruct implementation of the 2016 AQMP because the construction and operational emissions would not exceed SCAQMD's regional significance thresholds.

Alternative 2 would have less than significant impacts with respect to air quality, and impacts would be further reduced with the incorporation of Regulatory Compliance Measures AQ-1 through AQ-3. Overall, impacts to air quality under Alternative 2 are reduced as compared to impacts associated with the proposed project. No mitigation is required. Because impacts related to air quality for Alternative 2 would be less than those associated with the proposed project, cumulative impacts would also be less than cumulatively significant, and no mitigation would be required.

Biological Resources. Similar to the proposed project, the project site under Alternative 2 would be cleared, excavated, graded, and paved, and the area of disturbance would be similar to that of the proposed project. Therefore, Mitigation Measures BIO-1 through BIO-7 would still be applicable under Alternative 2 to ensure that potential impacts to biological resources are reduced to a less than significant level. Further, Regulatory Compliance Measure BIO-1 would also be applicable to Alternative 2 to ensure trail maintenance during project operation. As such, biological impacts associated with Alternative 2 are considered to be less than significant with mitigation and similar to those of the proposed project. However, overall impacts related to biological resources would be greater under Alternative 2 because a reduced amount of land would be preserved as conservation area (approximately 4.2 acres as compared to 5.6 acres under the proposed project). Although this area is not currently developed, a reduction in conservation area could allow for future development to occur on the 1.4 acres that would not be conserved under Alternative 2. Overall, Alternative 2 would have less than significant impacts with respect to biological resources with the incorporation of Mitigation Measure BIO-1 through BIO-7 and Regulatory Compliance Measure BIO-1.

Although impacts related to biological resources for Alternative 2 would be greater than those associated with the proposed project due to smaller area dedicated for conservation, cumulative impacts would be less than cumulatively significant, and no mitigation would be required.

Cultural Resources. Under Alternative 2, impacts to potential archaeological and paleontological resources would be similar to the proposed project because the project site boundaries and disturbance area would be essentially the same as under the proposed project. Mitigation Measures CUL-1 and CUL-2 would still be applicable under Alternative 2 in order to protect any unknown archaeological resources and previously undiscovered buried human remains. With the incorporation of Mitigation Measures CUL-1 and CUL-2, Alternative 2 would have less than significant impacts to archaeological resources and previously undiscovered buried human remains. Overall, impacts to cultural resources under Alternative 2 would be similar to the proposed project's impacts because the area of disturbance would remain the same.

Because impacts related to cultural resources for Alternative 2 would be similar to those associated with the proposed project, implementation of Mitigation Measures CUL-1 and CUL-2 would also

ensure that Alternative 2, together with cumulative projects, would not result in a significant cumulative impact to unique archaeological resources and previously undiscovered buried human remains.

Energy. Under Alternative 2, less energy would be used during project construction because of the reduced size of the residential development and other components as compared to the proposed project. Similarly, less energy would be used during project operation because the project would accommodate fewer residents under Alternative 2. Specifically, electricity, natural gas, and construction- and operation-related fuel consumption would be reduced under Alternative 2. Regulatory Compliance Measure ENG-1 would still be applicable under Alternative 2 in order to ensure that the project would not result in the wasteful, inefficient, or unnecessary consumption of energy resources during project construction and operation. With incorporation of Regulatory Compliance Measure ENG-1, Alternative 2 would have less than significant impacts with respect to energy. Overall, impacts to energy under Alternative 2 would be less than significant and would be less than impacts generated by the proposed project. No mitigation is required.

Because impacts related to energy for Alternative 2 would be less than those associated with the proposed project, cumulative impacts would also be less than cumulatively significant, and no mitigation would be required.

Geology and Soils. Under Alternative 2, similar impacts would occur to geology and soils as compared to the proposed project because the project site boundaries and the area of disturbance would remain essentially the same as under the proposed project. Although Alternative 2 would construct fewer residential units than the proposed project, the project would be located on the same soils with the same geological conditions, and therefore, would result in potentially significant impacts with respect to strong seismic ground shaking, ground failure (including liquefaction), slope stability, corrosive soils, ground settlement, expansive soils, and the destruction of paleontological resources, similar to the proposed project. As such, Mitigation Measures GEO-1 through GEO-5 and Regulatory Compliance Measures GEO-1 through GEO-3 would be applicable to Alternative 2, similar to the proposed project. With the implementation of the mitigation measures and regulatory compliance measures, potential impacts for Alternative 2 with respect to geology and soils would be less than significant and similar to those of the proposed project. Overall, impacts to geology and soils under Alternative 2 are similar to impacts associated with the proposed project.

Because impacts related to geology and soils for Alternative 2 would be similar to those associated with the proposed project, implementation of Mitigation Measures GEO-1 through GEO-5 and Regulatory Compliance Measures GEO-1 through GEO-3 would also ensure that Alternative 2, together with cumulative projects, would not result in a significant cumulative impact.

Greenhouse Gas Emissions. Due to the reduced size, it can be assumed that construction-related GHG emissions generated under Alternative 2 would be similar, but slightly less, than emissions expected under the proposed project. Similar to the proposed project, GHG emissions generated during construction of Alternative 2 would be temporary, would cease upon project completion, and would not result in a permanent increase in emissions. As such, construction-related impacts related to GHG emissions would be less than significant. It is reasonable to conclude that operational impacts related to GHG emissions would be less than the proposed project due to the reduction in new residents and fewer residential units constructed under Alternative 2. Consequently, GHG emissions

generated under Alternative 2 would also fall under the SCAQMD interim screening-level bright-line threshold of 3,500 MT of CO₂e per year for residential developments and would be less than significant.

Similar to the proposed project, Alternative 2 would not conflict with the goals of the 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Further, Alternative 2 would not be considered regionally significant per *State CEQA Guidelines* Section 15206. Thus, the project would not conflict with the 2016–2040 RTP/SCS targets because those targets were established and are applicable on a regional level. Overall, impacts to GHG emissions under Alternative 2 are less than impacts associated with the proposed project and are less than significant. No mitigation is required.

Because impacts related to GHG emissions for Alternative 2 would be less than those associated with the proposed project, cumulative impacts would also be less than cumulatively significant.

Hydrology and Water Quality. The modification and installation of existing and new utilities and infrastructure associated with the proposed project would still occur under Alternative 2. Similar to the proposed project, the project site under Alternative 2 would be cleared, excavated, graded, and paved, and the area of disturbance would be approximately the same. Similar to the proposed project, Alternative 2 would change the use on the project site, increase impervious surface area, increase stormwater runoff, and change the pollutants of concern in stormwater runoff. Alternative 2 would be required to comply with all National Pollutant Discharge Elimination System (NPDES) and City regulations governing hydrology and water quality. In compliance with these requirements, drainage facilitates to accommodate stormwater runoff and BMPs to reduce pollutants in stormwater runoff would be implemented. Therefore, similar to the proposed project, impacts related to surface and groundwater quality, groundwater supplies, erosion and siltation, flooding, storm drain capacity, polluted runoff, release of pollutants, and conflict with water quality and groundwater plans under Alternative 2 would be less than significant.

Similar to the proposed project, Alternative 2 would be constructed within a 100-year floodplain Zone AE. Alternative 2, similar to the proposed project, would be designed in compliance with the design requirements of Section 8-11.115 of the City's Municipal Code, which specifies design requirements for developments within the 100-year floodplain. The project under Alternative 2 would be required to obtain an Elevation certificate, as outlined in Regulatory Compliance Measure WQ-1. In addition, as specified in Regulatory Compliance Measure WQ-2, the project under Alternative 2 would be required to process a Conditional Letter of Map Revision (CLOMR) or Conditional Letter of Map Revision Based on Fill (CLOMR-F) during final design and a Letter of Map Revision (LOMR) or Letter of Map Revision Based on Fill (LOMR-F) upon project completion through the City, the Orange County Flood Control District (OCFCD), and the Federal Emergency Management Agency (FEMA). With compliance with Regulatory Compliance Measures WQ-1 and WQ-2, Alternative 2 would result in less than significant impacts related to hydrology and water quality. Overall, impacts to hydrology and water quality under Alternative 2 would be similar to those of the proposed project. No mitigation is required.

Because impacts related to hydrology and water quality for Alternative 2 would be similar to those associated with the proposed project, cumulative impacts would also be less than cumulatively significant, and no mitigation would be required.

Land Use and Planning. Similar to the proposed project, Alternative 2 would have less than significant impacts related to land use and planning. Under Alternative 2, as well as the proposed project, there would be no impacts related to the division of an existing community. Though Alternative 2 would represent a reduced project with fewer residential units, the proposed uses would be the same under the proposed project and Alternative 2. As such, Alternative 2 would still be consistent with both the existing General Plan land use designations of Planned Community, General Open Space, and Community Park and zoning designation of Planned Community District associated with the adopted Ortega Planned Community Comprehensive Development Plan (CDP) 78-01. As under the proposed project, the implementation of Alternative 2 would not require a General Plan Amendment or Zoning Amendment. Alternative 2 would be consistent with the policies contained in the City's General Plan, SCAG's 2008 Regional Comprehensive Plan, and SCAG's 2016–2040 RTP/SCS.

Under Alternative 2, 11 of the townhomes, or approximately 11 percent of the total units, would be designated affordable and would allow the Project Applicant to apply for a concession and waivers to development standards. Similar to the proposed project, Alternative 2 would be entitled to one incentive or concession under the State density bonus law and the City's affordable housing ordinance. Additionally, Alternative 2 would be entitled to waivers of development standards as necessary to prevent physical preclusion of the project alternative. It is reasonable to assume that these affordable housing waivers would be approved, unless the City were to find that the waiver to the development standard would have a specific adverse impact as defined in Section 9-3.505(d)(3)(L) of the City's Municipal Code, and would result in an adverse impact upon health, safety, the physical environment, or a designated historical resource. Following approval of the requested concession and waivers, Alternative 2 would be consistent with the City's Zoning Ordinance. As such, impacts related to land use under Alternative 2 are considered to be less than significant and predominantly similar to those associated with the proposed project. However, under Alternative 2, greater impacts would occur because fewer residential units would be constructed to meet the City's housing needs, including both market-rate and affordable units. No mitigation is required.

Although impacts related to land use and planning for Alternative 2 would be greater than those associated with the proposed project due to the provision of fewer residential units, cumulative impacts would be less than cumulatively significant, and no mitigation would be required.

Noise. Similar to the proposed project, Alternative 2 would encompass the same amount of acreage within the same proximity to noise receptors. Grading and site preparation activities are the loudest aspects of construction, and the grading and site preparation involved with Alternative 2 require a similar amount of, but slightly less, ground disturbance as the proposed project. However, Alternative 2 would result in the construction of less residential units and building area as compared to the proposed project. As such, construction-related noise generated under Alternative 2 would be produced for a slightly shorter period of time than the proposed project. Similar to the proposed project, Alternative 2 would also implement Mitigation Measure NOI-1, which requires adherence to noise restrictions during project construction. Alternative 2 would result in a similar amount of, but slightly less, ground vibration during construction as the proposed project. Similar to the proposed project, vibration levels under Alternative 2 at the closest commercial buildings would not exceed the United States Federal Transit Association (FTA) community annoyance threshold of 84 vibration

velocity decibels (VdB) for land uses similar to office uses. In addition, this vibration level would not exceed the FTA damage threshold of 94 VdB (0.2 in/sec peak particle velocity [PPV]) for buildings constructed of non-engineered timber and masonry. Therefore, noise and ground-borne vibration generated from construction activities associated with Alternative 2 would be similar to impacts under the proposed project. Overall, construction-related noise and vibration impacts under Alternative 2 would be less than significant.

The City's exterior and interior noise standards are 65 dBA CNEL and 45 dBA Community Noise Equivalent Level (CNEL), respectively, for single-family and multifamily residences. Alternative 2 would result in the operation of fewer residential units and building area as compared to the proposed project. Because Alternative 2 is proposed on the same project site as the proposed project, exterior noise levels would be the same in both circumstances. Under Alternative 2, it is assumed that the tot lot and gathering areas would be located in similar positions on the project site as compared to the proposed project. The noise sensitive areas under Alternative 2 which are required to meet the City's exterior standard of 65 dBA CNEL include the private rear yards of the single-family homes and the common use areas such as the tot lot and gathering areas. Similar to the proposed project, exterior noise levels would be below 65 dBA CNEL at the single-family home rear-yards, and no further noise reduction measures would be necessary.

It is assumed that the tot lot and the gathering areas would be sited in a similar location under Alternative 2 as for the proposed project. Under the proposed project, noise levels at the proposed tot lot and gathering areas are projected to exceed the 65 A-weighted decibel Community Noise Equivalent Level (dBA CNEL) exterior noise standard; therefore, similar to the proposed project an increased height of the perimeter wall would be necessary under Alternative 2. Therefore, Alternative 2 would require Mitigation Measure NOI-2, which would incorporate a minimum 14-foot-high wall near the proposed tot lot, thereby reducing noise levels to 64.7 dBA CNEL and all noise sensitive receptors below the City's exterior noise level standard for playground and park uses. Similar to the proposed project, under Alternative 2 some of the buildings on the western portion of the project site would need to upgrade the exterior façades in order to achieve adequate interior noise reduction. This can be accomplished by installing upgraded windows, improving wall construction, or a combo of both. As in the proposed project, Alternative 2 would be required to implement Mitigation Measure NOI-2, which requires preparation of a Final Acoustic Report to confirm that the interior living spaces of residential dwelling units will meet the City's interior noise standard of 45 dBA CNEL with windows and doors closed. With implementation of Mitigation Measure NOI-2, on-site interior noise levels would be consistent with the City's Noise Element standards for residential interior areas under Alternative 2. It should be noted that due to the reduction in the number of units under Alternative 2, it is possible that the outdoor amenities and the residential buildings could be relocated further from noise sources and Mitigation Measure NOI-2 may not be required.

Overall, impacts to operational noise under Alternative 2 would be similar to those of the proposed project, and mitigation would be required to reduce impacts to a less than significant level.

Implementation of Mitigation Measures NOI-1 and NOI-2 would ensure that construction of Alternative 2, together with cumulative projects, would not result in a significant cumulative impact as a result of construction- and operation-related noise. Although impacts related to noise for

Alternative 2 would be similar to those associated with the proposed project, cumulative impacts would be less than cumulatively significant.

Transportation. Alternative 2 would result in the construction of less residential units and building area as compared to the proposed project, and therefore, a shorter construction schedule would be necessary. As such, construction-related traffic generated under Alternative 2 would occur for a shorter period of time than the proposed project, and construction trips would be reduced. Therefore, similar to the proposed project, Alternative 2 would result in less than significant impacts related to construction traffic.

Operation of Alternative 2, similar to the proposed project, would generate more trips than during construction. The Level of Service (LOS) analyses prepared for the proposed project determined that the project would not result in any significant operational traffic impacts. The proposed project has the potential to generate approximately 890 average daily trips (ADT), including 64 trips (16 inbound and 48 outbound) in the a.m. peak hour and 82 trips (51 inbound and 31 outbound) in the p.m. peak hour. All study area intersections, including the hot-spot intersections, are anticipated to operate at satisfactory LOS based on the Intersection Capacity Utilization (ICU) and Highway Capacity Manual (HCM) methodologies. Impacts under the proposed project were determined to be less than significant. Therefore, it can be concluded that traffic impacts under Alternative 2 would be less than significant because this alternative represents a reduced project that would result in fewer trips. Overall, operational traffic impacts under Alternative 2 would be less than impacts associated with the proposed project. No mitigation is required.

Since Alternative 2 represents a reduced project that would result in fewer trips, it can be concluded that this alternative would also generate fewer vehicle miles traveled (VMT) per capita as compared to the regional VMT per capita. As such, based on the Governor's Office of Planning and Research (OPR) Technical Advisory (TA) guidance and similar to the proposed project, Alternative 2 would not have a significant transportation impact. However, since the City does not currently have thresholds or standards in place for assessing potential VMT impacts, VMT information is provided for disclosure purposes only, and the analysis of traffic impacts in this Draft EIR for CEQA purposes are based on the City's LOS thresholds. No mitigation would be required.

Similar to the proposed project, Alternative 2 would be required to comply with General Plan policies addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, as well as City Council Policy No. 310, which establishes metrics for determining traffic impacts, consistent transportation-related goals and policies in the City's General Plan, and the Orange County Congestion Management Program (CMP) (2019).

Because impacts related to traffic for Alternative 2 would be less than those associated with the proposed project, cumulative impacts would also be less than cumulatively significant.

Tribal Cultural Resources. Under Alternative 2, impacts to potential tribal cultural resources would be similar to the proposed project because the project site boundaries and disturbance area would remain the same as under the proposed project. Mitigation Measures CUL-1 and CUL-2 would still be applicable under Alternative 2 to protect any unknown tribal cultural resources and previously undiscovered buried human remains. With the incorporation of Mitigation Measures CUL-1 and CUL-2, Alternative 2 would have less than significant impacts to tribal cultural resources and

previously undiscovered buried human remains. Overall, impacts to tribal cultural resources under Alternative 2 would be similar to the proposed project's impacts because the project site boundaries and area of disturbance would remain the same.

Because impacts related to tribal cultural resources for Alternative 2 would be similar to those associated with the proposed project, implementation of Mitigation Measures CUL-1 and CUL-2 would also ensure that Alternative 2, together with cumulative projects, would not result in a significant cumulative impact to unique tribal cultural resources and previously undiscovered buried human remains.

Overview of Potential Impact/Comparison to Proposed Project. Construction impacts would be incrementally reduced under Alternative 2 as fewer residential units would be constructed (approximately 25 percent fewer units). Similarly, fewer operational impacts would occur as fewer residents, traffic trips, emissions, and noise would result from a smaller development. Overall, physical impacts under this alternative would be incrementally reduced due to fewer housing units being constructed and occupied.

Project Objectives. Alternative 2 would meet some, but not all of the project objectives. Alternative 2 would develop a residential development to increase the City's housing stock (Project Objective 1); develop a project that balances the development potential of the project site with environmental considerations (Project Objective 2); revitalize the vacant site with a well-designed and landscaped residential project that is compatible with the surrounding community (Project Objective 3); provide recreational opportunities for the surrounding community with incorporation of a multi-purpose trail (Project Objective 7); locate housing adjacent to available infrastructure to serve the project (Project Objective 8); and implement the City's General Plan (Project Objective 9).

However, this alternative would not achieve Project Objective 4, including increasing the City's tax base generating revenue for the City through property taxes, to the same extent as the proposed project because a smaller residential development would likely generate less property tax revenue. Additionally, a smaller residential development would result in the elimination of affordable units because they would no longer be economically feasible to construct. As such, this alternative would not meet Project Objectives 1 and 5 to the same extent as the proposed project, because a smaller residential development would not increase the City's affordable housing stock and providing non-traditional home ownership opportunities to the same extent as the proposed project. Furthermore, Alternative 2 would not dedicate as much acreage as the proposed project for a permanent conservation area adjacent to the San Juan Creek.

Overall, this alternative would meet some of the project objectives, but not to the same degree as the proposed project.

5.5 IDENTIFICATION OF ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires the identification of an Environmentally Superior Alternative. *State CEQA Guidelines* Section 15126.6(e)(2) states that if the No Project Alternative is the Environmentally Superior Alternative, then the EIR shall also identify an Environmentally Superior Alternative among the other alternatives. Table 5.B provides, in summary format, a comparison of the level of impacts for each Alternative to the proposed project.

Table 5.B: Comparison of Alternatives

Impact Area	Proposed Project Impacts with Mitigation (if any)	Alternative 1: No Project/No Development	Alternative 2: Reduced Project Alternative
Aesthetics	Less than Significant	Less	Similar
Air Quality	Less than Significant	Less	Less
Biological Resources	Less than Significant	Greater	Greater
Cultural Resources	Less than Significant	Less	Similar
Energy	Less than Significant	Less	Less
Geology and Soils	Less than Significant	Less	Similar
Greenhouse Gas Emissions	Less than Significant	Less	Less
Hydrology and Water Quality	Less than Significant	Less	Similar
Land Use and Planning	Less than Significant	Greater	Greater
Noise	Less than Significant	Less	Similar
Transportation/Traffic	Less than Significant	Less	Less
Tribal Cultural Resources	Less than Significant	Less	Similar

The No Project Alternative has the least impact to the environment because it would not result in the development of the proposed project on the currently undeveloped site. While overall the No Project Alternative would lessen or avoid the impacts of the proposed project, the beneficial impacts of the proposed project—including increasing the City’s housing stock, improving the City’s economic base through increased property tax revenues, and dedicating land for conservation—would not occur, and none of the Project Objectives would be met.

With the exception of the No Project Alternative, the Environmentally Superior Alternative would be Alternative 2, the Reduced Project Alternative. This alternative would either lessen environmental impacts or result in impacts similar to those associated with the proposed project in most environmental areas. However, similar to the No Project Alternative, impacts to biological resources and land use would be greater because the beneficial impacts of the proposed project would not occur, including increasing the City’s housing stock and dedicating land for conservation to the same degree as under the proposed project. Although Alternative 2 would achieve some of the project objectives—specifically the project objectives aimed at providing a residential development to increase the City’s housing stock (Project Objective 1); balancing the development potential of the project site with environmental considerations (Project Objective 2); revitalizing the vacant site with a well-designed and landscaped residential project that is compatible with the surrounding community (Project Objective 3); provide recreational opportunities for the surrounding community with incorporation of a multi-purpose trail (Project Objective 7); locate housing adjacent to available infrastructure to serve the project (Project Objective 8); and implement the City’s General Plan

(Project Objective 9) – this alternative would not maximize the potential to maximize the City’s tax base generating revenue through property taxes (Project Objective 4) and would also conflict with Project Objectives 1 and 5, which involve developing a residential development to increase the City’s affordable housing stock and providing non-traditional home ownership opportunities through the provision of affordable units, respectively. Furthermore, Alternative 2 would not dedicate the same maximum acreage as the proposed project for a permanent conservation area adjacent to the San Juan Creek (Project Objective 7). Therefore, this alternative would meet some of the project objectives, but not to the same degree as the proposed project.

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