

**SECTION 9.0**  
**ALTERNATIVES**

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## **9.0 ALTERNATIVES**

### **9.1 INTRODUCTION**

Section 15126.6 of the California Environmental Quality Act (CEQA) Guidelines requires that an Environmental Impact Report (EIR) describe a range of reasonable alternatives to the proposed project that could feasibly attain most of the basic objectives of the project and are capable of avoiding or substantially lessening one or more of the significant adverse effects of the proposed project. The rule of reason requires that an EIR address only those alternatives necessary to permit a reasoned choice. These alternatives must foster informed decision-making and public participation. The EIR must also provide the rationale for the selection or rejection of each alternative.

The CEQA Guidelines specifically state that an EIR should "...identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts."

This section addresses the following three alternatives to the proposed project:

- No Project/Existing Conditions Alternative.
- No Project Alternative/Existing Entitlements Alternative.
- Town Home Alternative.

For these three alternatives to the proposed project, the analysis in this section:

- Describes the alternative and the rationale for its consideration.
- Discusses the impacts of the alternative and evaluates the significance of those impacts.
- Evaluates the alternative relative to the proposed project, specifically addressing project objectives, feasibility, the elimination or reduction of impacts, and comparative merits.

This section also discusses alternatives considered but rejected by the City and not evaluated in detail in this DEIR.

### **9.2 CRITERIA FOR ANALYSIS OF ALTERNATIVES**

#### **9.2.1 IDENTIFICATION OF IMPACTS**

After describing each alternative to the proposed project, the potential environmental impacts of each alternative are identified. Each major resource area addressed in the impact analysis in Section 4.0 (Existing Setting, Impacts, Mitigation Measures and Level of Significance After Mitigation) is evaluated in this section for the alternatives to the proposed project. The potential environmental impacts of each alternative are described.

#### **9.2.2 COMPARISON OF THE PROPOSED PROJECT**

Following the identification of impacts, the alternatives were evaluated relative to the proposed project based on the following:

**Feasibility:** Each alternative was evaluated to determine if it would "...feasibly attain the basic objectives of the project..." (15126[d]). CEQA defines "feasible" to mean "...capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors" (CEQA Guidelines Section 15364).

In addition to the environmental consequences of a particular alternative, decision-makers must consider if an alternative can be implemented in a reasonable period of time and, equally important, what economic, legal, social and technological factors will or might affect its implementation.

**Elimination/Reduction of Significant Adverse Impacts:** The alternatives were evaluated to determine if they further minimize any potentially adverse impacts that would occur under the proposed project, as described in detail in Section 4.0. The project-related adverse impacts that are reduced by a particular alternative analyzed in this section are identified.

**Comparative Merits:** The performance of each alternative relative to the proposed project is evaluated to determine the comparative merits of the alternatives (CEQA Guidelines Section 15126.6[a]). This analysis is based, in part, on a comparison to the proposed project's impacts. It also includes a discussion of the relative feasibility of each alternative.

**Ability to Meet the Project Objectives:** Each alternative to the proposed project was evaluated to determine its ability to meet each of the project objectives provided in Section 2.0 (Project Description and Project Objectives).

### **9.3 ALTERNATIVES CONSIDERED BUT REJECTED**

#### **9.3.1 ALTERNATIVE SITE FOR THE PROPOSED PROJECT**

This DEIR does not analyze an alternative site for the proposed project because the applicant does not own or control another suitable property in the City of Santa Ana. The proposed project would generate approximately the same traffic and air quality emissions at any other location in the City, to the same or greater extent than at the proposed site. Therefore, locating the proposed project at another site in the City would essentially shift the project's adverse impacts to that other location, but would not be expected to avoid or substantially reduce those impacts. However, it should be noted that the traffic impacts which occur in the City of Orange under the proposed project could possibly be located to an area entirely within the City of Santa Ana if an alternative project site were considered, but the level of impact would remain comparable. As a result, an alternative site for the proposed project was not evaluated in this DEIR.

### **9.4 DESCRIPTIONS OF ALTERNATIVES TO THE PROPOSED CITY PLACE SKY LOFTS PROJECT**

#### **9.4.1 INTRODUCTION**

One of the alternatives required for analysis in an EIR is the No Project Alternative. The CEQA Guidelines (15126.6(e)(2)) state that the "...no project analysis shall discuss the existing conditions at the time the Notice of Preparation is published... 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."

The No Project Alternative is required by CEQA to establish a comparative basis for understanding the impacts of a proposed project and alternatives to that proposed project. Section 4.0 of this DEIR analyzes

the impacts of the proposed project on existing conditions. The No Project Alternative analysis discusses the existing conditions at the time the Notice of Preparation (NOP) was published, as well as what would be reasonably expected to occur in the foreseeable future if the proposed project was not approved, based on current plans and consistent with available infrastructure (CEQA Guidelines Section 15126.6(e)(2)).

Two No Project Alternatives are assessed in this DEIR. The first No Project Alternative assumes that no development occurs on the project site and that existing conditions on the site are retained. The second No Project Alternative assumes the site is developed based on the existing entitlements for this property.

In addition, this DEIR considered a Town Home Alternative to the proposed project. The Town Home Alternative investigates a lower intensity of uses on the project site, by reducing the number of dwelling units to the 57 town homes originally proposed as part of the City Place project.

The two No Project Alternatives and the Town Home Alternative are described in the following sections.

#### 9.4.2 NO PROJECT/EXISTING CONDITIONS ALTERNATIVE

This No Project Alternative assumes that the existing 2.008-acre project site remains as is and that no development occurs on the site. With this Alternative, the site would remain vacant and no residential or commercial uses would be developed.

#### 9.4.3 NO PROJECT/EXISTING ENTITLEMENT ALTERNATIVE

This No Project Alternative assumes that the approximately 2.008-acre project site would be developed consistent with the existing approved entitlements for the project site per Specific Development Plan 59 (SD-59). The existing entitlements would allow for one dwelling unit per acre. This No Project Alternative would result in two additional housing units and would result in a substantially lower land use density on the project site than the proposed project that consists of 353 residential dwelling units.

#### 9.4.4 TOWN HOME ALTERNATIVE

The Town Home Alternative consists of 57 town homes on the project site. This alternative is the same design as proposed for the site in the original City Place project in 2004. However, only two dwelling units were entitled for the site. This Alternative would reduce the development on the project site by 296 residential dwelling units compared to the proposed project.

### 9.5 ALTERNATIVES ANALYSIS

The alternatives analysis in this section discusses and compares the environmental impacts associated with the two No Project Alternatives, the Town Home Alternative and the proposed project.

#### 9.5.1 ENVIRONMENTAL IMPACTS OF THE NO PROJECT/EXISTING CONDITIONS ALTERNATIVE

##### 9.5.1.1 Impacts of the No Project/Existing Conditions Alternative Related to Aesthetics

The No Project/Existing Conditions Alternative would not change the aesthetic quality of the existing views of and from the project site because no development would occur on the project site. This Alternative would not result in construction or operation of land uses on the site and would not result in views of construction activity or suburban/urban land use on the site from off-site locations. However,

because this site would remain vacant, it would continue to be unused and would not be consistent with views of adjacent residential or commercial uses which include buildings in good condition with quality landscaping. Therefore, there would be no impacts related to aesthetics with the No Project/Existing Conditions Alternative.

#### 9.5.1.2 Impacts of the No Project/Existing Conditions Alternative Related to Air Quality

The No Project/Existing Conditions Alternative would not result in adverse short- or long-term air quality impacts because no development would occur on the project site. This Alternative would not result in construction or operational air quality impacts because the project site would remain in its current vacant and undeveloped condition and there would be no construction-related disruption and no land uses on the site.

#### 9.5.1.3 Impacts of the No Project/Existing Conditions Alternative Related to Cultural Resources

The No Project/Existing Conditions Alternative would not result in adverse short- or long-term impacts on cultural resources because no disruption of soils would occur on the project site and no construction or operation of land use would occur on the site.

#### 9.5.1.4 Impacts of the No Project/Existing Conditions Alternative Related to Geology and Soils

The No Project/Existing Conditions Alternative would not result in adverse impacts to Geology and Soils because no development would occur on the project site. The project site would remain in its current vacant and undeveloped condition and no ground disturbance would occur.

#### 9.5.1.5 Impacts of the No Project/Existing Conditions Alternative Related to Hazards and Hazardous Materials

The No Project/Existing Conditions Alternative would not result in adverse short- or long-term impacts related to hazardous materials because no development or operations would occur on the project site; therefore, no hazardous materials would be brought to or from the site nor used on the site.

#### 9.5.1.6 Impacts of the No Project/Existing Conditions Alternative Related to Hydrology and Water Quality

The No Project/Existing Conditions Alternative would not result in adverse short- or long-term impacts related to hydrology because no disruption of the site would occur and no changes in existing conditions related to water infiltration and runoff would occur. The No Project/Existing Conditions Alternative would not result in short- or long-term adverse impacts related to water quality because there would be no change in land uses on the site and no change in surface hydrology.

#### 9.5.1.7 Impacts of the No Project/Existing Conditions Alternative Related to Land Use and Planning

The No Project/Existing Conditions Alternative would not result in land use compatibility impacts or conflicts with any City planning programs in that no development would occur on the project site and the existing General Plan and Zoning designations of the property would remain unchanged.

#### 9.5.1.8 Impacts of the No Project/Existing Conditions Alternative Related to Noise

The No Project/Existing Conditions Alternative would not result in adverse short- or long-term impacts related to noise because no changes in existing conditions related to the project site or project related traffic would occur.

#### 9.5.1.9 Impacts of the No Project/Existing Conditions Alternative Related to Population and Housing

The No Project/Existing Conditions Alternative would not result in adverse impacts related to population and housing because no new residential dwelling units would be constructed. The site would remain undeveloped and no construction or land use would occur.

#### 9.5.1.10 Impacts of the No Project/Existing Conditions Alternative Related to Public Services

The No Project/Existing Conditions Alternative would not result in short- or long-term adverse impacts to public services because no construction or land uses would occur on the site and no new demands for public services would be generated.

#### 9.5.1.11 Impacts of the No Project/Existing Conditions Alternative Related to Recreation

The No Project/Existing Conditions Alternative would not result in short- or long-term adverse impacts to recreation because no construction or land uses would occur on the site and no new demands for recreation would be generated.

#### 9.5.1.12 Impacts of the No Project/Existing Conditions Alternative Related to Transportation and Traffic

Implementation of the No Project/Existing Conditions Alternative would not result in short- or long-term adverse impacts related to transportation and traffic because no development would occur on the project site and no construction- or operation-related trips would be generated.

#### 9.5.1.13 Impacts of the No Project/Existing Conditions Alternative Related to Utilities and Service Systems

The No Project/Existing Conditions Alternative would not result in short- or long-term adverse impacts on utilities and service systems because no construction or land uses would occur on the project site and no new demands for utilities and service systems would be generated. Therefore, the No Project/Existing Conditions Alternative would not result in significant impacts related to utilities and service systems.

### 9.5.2 ENVIRONMENTAL IMPACTS OF THE NO PROJECT/EXISTING ENTITLEMENT ALTERNATIVE

#### 9.5.2.1 Impacts of the No Project/Existing Entitlement Alternative Related to Aesthetics

Implementation of the No Project/Existing Entitlement Alternative would change the appearance of the site from an undeveloped, graded lot to two homes. This change would be less than significant, as would minor increases in light and glare. The residences that would be constructed would be expected to be between one and four stories tall. Buildings surrounding the site are of similar height or taller. Therefore, visual quality impacts of this Alternative related to shade and shadow would be less than significant.

Impacts of this Alternative related to aesthetics would be less than the proposed project which would result in significant adverse shade/shadow impacts.

#### 9.5.2.2 Impacts of the No Project/Existing Entitlement Alternative Related to Air Quality

Implementation of the No Project/Existing Entitlement Alternative would result in air quality impacts due to emissions during construction and operation of two residential dwelling units on-site. However, these emissions are anticipated to be within SCAQMD thresholds and, therefore, would be less than significant. The proposed project would result in ROG emissions associated with the application of architectural coatings during construction and vehicle trips during operation that that would be above SCAQMD regional thresholds. This adverse air quality impact is significant. Therefore, impacts of the No Project/Existing Entitlement Alternative related to Air Quality would be less than the proposed project.

#### 9.5.2.3 Impacts of the No Project/Existing Entitlement Alternative Related to Cultural Resources

The project site is currently vacant and there are no known archaeological or historic resources on-site. However, the City of Santa Ana is an archaeologically sensitive area, and therefore, grading and development of the project site under the No Project/Existing Entitlement Alternative may have an impact on unknown subsurface archaeological and paleontological resources. Both the No Project/Existing Entitlement Alternative and the proposed project are anticipated to result in less-than-significant impacts related to cultural resources after mitigation. However, potential cultural resources impacts of this Alternative would be less than the proposed project because the proposed project requires excavation of more subsurface material for the two-and-one-half levels of below-grade parking.

#### 9.5.2.4 Impacts of the No Project/Existing Entitlement Alternative Related to Geology and Soils

Implementation of the No Project/Existing Entitlement Alternative would result in impacts related to geology and soils due to the addition of two residential dwelling units on-site. The site is subject to seismic hazards and geologic conditions that could result in differential settlement. However, as with the proposed project, these impacts would be reduced to a less-than-significant level with mitigation that would require the implementation of engineering recommendations from a final geotechnical report. Also, impacts related to erosion and loss of soil would be reduced to a less-than-significant level with mitigation that requires the preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP). However, potential impacts of the proposed project related to geology and soils would be greater than with this Alternative. This is because clays at depths of 45 to 80 feet below grade are susceptible to compression under the magnitude of the stress that would be imposed by the proposed project, in particular the 27-story tower. Therefore, the potential for differential settlement is greater with the proposed project than with the Alternative.

#### 9.5.2.5 Impacts of the No Project/Existing Entitlement Alternative Related to Hazards and Hazardous Materials

Impacts of the No Project/Existing Entitlement Alternative related to hazards and hazardous materials, including potential hazards associated with the abandoned jet fuel line, would be similar to the proposed project, and would be less than significant.

#### 9.5.2.6 Impacts of the No Project/Existing Entitlement Alternative Related to Hydrology and Water Quality

Implementation of the No Project/Existing Entitlement Alternative would result in potential impacts to hydrology and water quality due to the construction of two residential dwelling units on-site. Implementation of this Alternative could potentially result in an increase in urban pollutants released into downstream areas due to storm water runoff. However, as with the proposed project, impacts would be reduced to below a level of significance with mitigation. Impacts of this Alternative related to hydrology and water quality would be similar to those of the proposed project.

#### 9.5.2.7 Impacts of the No Project/Existing Entitlement Alternative Related to Land Use and Planning

The No Project/Existing Entitlement Alternative would not result in conflicts related to land use plans because this Alternative proposes to implement the existing entitlements for the site (two dwelling units). The proposed project includes a greater number of units that are currently entitled for the site, resulting in higher density. As described in Section 4.8 (Land Use), SD-59, of which the project is a part, has an allowable density of 90 du/acre. The total number of acres in SD-59 is 17.7, which includes the City Place project site and the proposed project site. The proposed project includes 353 dwelling units and the City Place project includes 185 dwelling units for a total of 538 dwelling units. The 538 units divided by 17.7 acres yields 31 du/acre. This density is below the 90 du/acre allowed for SD-59 and for the District Center General Plan land use designation. Therefore, the density of the proposed project would be consistent with the densities allowed in the General Plan and SD-59 designation for the project site.

The proposed project is consistent with the General Plan District Center land use designation, as this designation allows residential uses. As described earlier in Section 2.0, (Project Description and Project Objectives), the proposed project would require an amendment to SD-59 to establish permitted land uses, site development standards, and parking requirements for the proposed project.

Thus, the proposed project would be consistent with the allowable General Plan and SD-59 density for the project site. The residential and parking land uses of the proposed project would be consistent with the General Plan and the required amendment to SD-59 would result in project consistency with SD-59. Therefore, impacts of the proposed project related to land use and planning would be less than significant and would be similar to the No Project/Existing Entitlement Alternative.

#### 9.5.2.8 Impacts of the No Project/Existing Entitlement Alternative Related to Noise

Implementation of the No Project/Existing Entitlement Alternative would result in noise impacts due to the construction of two residential dwelling units on-site. However, these impacts would occur over a shorter period of time because the construction period for the two dwelling units would be substantially less than for the proposed project which includes a 27-story residential tower, 20 town homes, and a parking garage. Also, the Alternative would require less construction equipment than the proposed project. This Alternative would also result in substantially less traffic noise and operation noise than the proposed project. Construction noise impacts would be mitigated to below a level of significance with adherence to the City's noise regulations. Operational and traffic noise would be less than significant. The No Project/Existing Entitlement Alternative would result in less-than-significant impacts related to noise, as would the proposed project. However, impacts would be substantially less than the proposed project.

#### 9.5.2.9 Impacts of the No Project/Existing Entitlement Alternative Related to Population and Housing

The No Project/Existing Entitlement Alternative would result in an increase in only two housing units and, therefore, induce negligible population growth. Implementation of the No Project/Existing Entitlement Alternative would result in substantially fewer residents than the proposed project. Therefore, the No Project/Existing Entitlement Alternative would result in less-than-significant impacts related to population and housing and impacts would be substantially less than the proposed project.

#### 9.5.2.10 Impacts of the No Project/Existing Entitlement Alternative Related to Public Services

Implementation of the No Project/Existing Entitlement Alternative would result in minor increased demand for public services due to the addition of two residential dwelling units on-site. This Alternative would generate substantially less demand for these services and facilities than the proposed project because only two dwelling units would be constructed on the project site under this Alternative, rather than the 353 with the proposed project. Impacts to public services and utilities of both this Alternative and the proposed project would be less than significant. However, impacts associated with the No Project/Existing Entitlement Alternative would be less than the proposed project.

#### 9.5.2.11 Impacts of the No Project/Existing Entitlement Alternative Related to Recreation

Implementation of the No Project/Existing Entitlement Alternative would result in minor increased demand for recreation resources due to the addition of two residential dwelling units on-site. This Alternative would generate substantially less demand for these services and facilities than the proposed project because only two dwelling units would be constructed on the project site under this Alternative, rather than the 353 with the proposed project. Impacts to recreation resources of both this Alternative and the proposed project would be less than significant. However, impacts of the No Project/Existing Entitlement Alternative would be less than the proposed project.

#### 9.5.2.12 Impacts of the No Project/Existing Entitlement Alternative Related to Transportation and Traffic

Implementation of the No Project/Existing Entitlement Alternative would result in a relatively negligible amount of additional vehicle trips due to the development of only two residential dwelling units and traffic impacts would be less than significant. This Alternative includes 353 fewer dwelling units than the proposed project, and therefore would result in substantially fewer vehicle trips. Therefore, traffic impacts of the No Project/Existing Entitlement Alternative would be substantially less than those of the proposed project.

#### 9.5.2.13 Impacts of the No Project/Existing Entitlement Alternative Related to Utilities and Services Systems

Implementation of the No Project/Existing Entitlement Alternative would result in a minor increase in demand for water, sewer, telephone, natural gas, and electricity services and facilities due to the addition of two residential dwelling units on-site. This Alternative would generate substantially less demand for these utilities than the proposed project because only two dwelling units would be constructed on the project site under this Alternative, rather than the 353 with the proposed project. Impacts to utilities and services systems of both this Alternative and the proposed project would be less than significant. However, impacts of the No Project/Existing Entitlement Alternative would be less than the proposed project.

### 9.5.3 ENVIRONMENTAL IMPACTS OF THE TOWN HOME ALTERNATIVE

#### 9.5.3.1 Impacts of the Town Home Alternative Related to Aesthetics

Implementation of the Town Home Alternative would change the appearance of the site from an undeveloped, graded lot to that of 57 town homes, arranged in three clusters around a courtyard in each cluster. This change in appearance would be less than significant, as would minor increases in light and glare. The town homes would have a maximum height 36 feet above grade. Buildings surrounding the site are of similar height or taller. Therefore, visual quality impacts of this Alternative related to shade and shadow would be less than significant. Impacts of this Alternative related to aesthetics would be less than the proposed project which would result in significant adverse shade/shadow impacts.

#### 9.5.3.2 Impacts of the Town Home Alternative Related to Air Quality

Implementation of the Town Home Alternative would result in air quality impacts due to emissions during construction and operation of the 57 Town Homes on-site. These emissions could potentially be above SCAQMD thresholds and, therefore, would result in a significant impact. The proposed project would result in ROG emissions associated with the application of architectural coatings during construction and vehicle trips during operation that that would be above SCAQMD regional thresholds and would result in a significant impact. Impacts of the Town Home Alternative related to air quality, although anticipated to be significant, would be less than the proposed project because this Alternative includes 296 fewer units and related vehicle trips than the proposed project

#### 9.5.3.3 Impacts of the Town Home Alternative Related to Cultural Resources

The project site is currently vacant and there are no known archaeological or historic resources on-site. However, the City of Santa Ana is an archaeologically sensitive area, and therefore grading and development of the project site under the Town Home Alternative may have an impact on unknown subsurface archaeological and paleontological resources. Both the Town Home Alternative and the proposed project are anticipated to result in less-than-significant impacts related to cultural resources after mitigation. However, potential cultural resources impacts of this Alternative would be less than the proposed project because the proposed project requires excavation of more subsurface material for the two and one-half levels of below-grade parking.

#### 9.5.3.4 Impacts of the Town Home Alternative Related to Geology and Soils

Implementation of the Town Home Alternative would result in impacts related to geology and soils due to the addition of 57 town homes on-site. The site is subject to seismic hazards and geologic conditions that could result in differential settlement. However, as with the proposed project, these impacts would be reduced to a less-than-significant level with mitigation that would require the implementation of engineering recommendations from a final geotechnical report. Also, impacts related to erosion and loss of soil would be reduced to a less-than-significant level with mitigation that requires the preparation and implementation of a SWPPP. However, potential impacts of the proposed project related to geology and soils would be greater than with this Alternative. This is because clays at depths of 45 to 80 feet below grade are susceptible to compression under the magnitude of the stress that would be imposed by the proposed project, in particular the 27-story tower. Therefore, the potential for differential settlement is greater with the proposed project than with the Town Home Alternative.

#### 9.5.3.5 Impacts of the Town Home Alternative Related to Hazards and Hazardous Materials

Impacts of the No Project/Existing Entitlement Alternative related to hazards and hazardous materials, including potential hazards associated with the abandoned jet fuel line, would be similar to the proposed project, and would be less than significant.

#### 9.5.3.6 Impacts of the Town Home Alternative Related to Hydrology and Water Quality

Implementation of the Town Home Alternative would result in potential impacts to hydrology and water quality due to the construction of 57 Town Homes on-site. Implementation of this Alternative could potentially result in an increase in urban pollutants released into downstream areas due to storm water runoff. However, as with the proposed project, impacts would be reduced to below-a-level of significance with mitigation. Impacts of this Alternative related to hydrology and water quality would be similar to those of the proposed project.

#### 9.5.3.7 Impacts of the Town Home Alternative Related to Land Use and Planning

The Town Home Alternative proposes 55 more dwelling units than are currently entitled for the site. The proposed project would implement a greater number of units and would result in higher density than the Town Home Alternative. As described in Section 4.8 (Land Use), SD-59, of which the project is a part, has an allowable density of 90 du/acre. The total number of acres in SD-59 is 17.7, which includes the City Place project site and the proposed project site. The proposed project includes 353 dwelling units and the City Place project includes 185 dwelling units for a total of 538 dwelling units. The 538 units divided by 17.7 acres yields 31 du/acre. The density of the Town Home Alternative would be 14 du/acre (55 + 185 units (240) units divided by 17.7 acres = 14 du/acre). These densities are below the 90 du/acre allowed for SD-59 and for the District Center General Plan land use designation. Therefore, the densities of the proposed project and the Town Home Alternative would be consistent with the density allowed in the General Plan and SD-59 designation for the project site.

Both the proposed project and the Town Home Alternative would require an amendment to SD-59 to establish permitted land uses, site development standards, and parking requirements.

Thus, both the proposed project and the Town Home Alternative would be consistent with the allowable General Plan and SD-59 density for the project site. They would both be consistent with the General Plan and the required amendment to SD-59 would result in consistency with SD-59. Therefore, impacts of the proposed project related to land use and planning would be less than significant and would be similar to the Town Home Alternative.

#### 9.5.3.8 Impacts of the Town Home Alternative Related to Noise

Implementation of the Town Home Alternative would result in noise impacts due to the construction of 57 town homes on-site. However, these impacts would occur over a shorter period of time because the construction period for 57 dwelling units would be substantially less than for the proposed project which includes a 27-story residential tower, 20 town homes, and a parking garage. This Alternative would also result in substantially less traffic noise and operation noise than the proposed project. Construction noise impacts would be mitigated to below a level of significance with adherence to the City's noise regulations. Operational and traffic noise would be less than significant. The Town Home Alternative would result in less-than-significant impacts related to noise, as would the proposed project, but impacts would be substantially less than the proposed project.

### 9.5.3.9 Impacts of the Town Home Alternative Related to Population and Housing

The Town Home Alternative would result in an increase in 57 housing units and related population, which is not expected to exceed the regional projections for Santa Ana. Therefore, as with the proposed project, the impacts of this Alternative related to population growth would be less than significant. However, the population generated by this Alternative would be less than with the proposed project, which includes 353 dwelling units and would generate an estimated 706 persons on the project site. Therefore, impacts related to population growth would be substantially less with this Alternative than with the proposed project.

### 9.5.3.10 Impacts of the Town Home Alternative Related to Public Services

Implementation of the Town Home Alternative would result in increased demand for public services due to the addition of 57 residential dwelling units on-site. As with the proposed project, this impact would be less than significant because existing public services capacity can accommodate the increased demand. This Alternative would generate substantially less demand for these services and facilities than the proposed project because the Alternative includes 296 fewer dwelling units than the proposed project. Therefore, impacts associated with the Town Home Alternative would be less than the proposed project.

### 9.5.3.11 Impacts of the Town Home Alternative Related to Recreation

Implementation of the Town Home Alternative would result in increased demand for recreation resources due to the addition of 57 residential dwelling units on-site. As with the proposed project, impacts would be reduced to a less-than-significant level with incorporation of mitigation that would require the applicant to comply with the City's public dedication requirements either through provision of private open space, public land dedication, fees, or other vehicles acceptable to the City. However, this Alternative would generate substantially less demand for recreation resources than the proposed project because this Alternative includes 296 fewer dwelling units than the proposed project.

### 9.5.3.12 Impacts of the Town Home Alternative Related to Transportation and Traffic

Implementation of the Town Home Alternative would result in generation of vehicle trips due to the development of 57 town homes. As with the proposed project, this Alternative could potentially result in significant short-term traffic impacts that cannot be mitigated to below a level of significance. This Alternative includes 296 fewer dwelling units than the proposed project, and therefore would result in substantially fewer vehicle trips than the proposed project. Thus, traffic impacts of the Town Home Alternative would be less than those of the proposed project.

### 9.5.3.13 Impacts of the Town Home Alternative Related to Utilities and Service Systems

Implementation of the Town Home Alternative would result in increased demand for utilities and service systems due to the addition of 57 residential dwelling units on-site. As with the proposed project, this impact would be less than significant because existing utilities and service systems capacity can accommodate the increased demand. This Alternative would generate substantially less demand for these services and facilities than the proposed project because the Alternative includes 296 fewer dwelling units than the proposed project. Therefore, impacts associated with the Town Home Alternative would be less than the proposed project.

## **9.6 ABILITY OF THE ALTERNATIVES TO MEET THE DEFINED PROJECT OBJECTIVES**

### **9.6.1 PROJECT OBJECTIVES**

The project objectives for the proposed City Place Sky Lofts project are to:

- Develop the City Place as a commercial and residential center that provides entertainment, shopping, dining and living opportunities for the residents of Santa Ana and surrounding area, and that maximizes the advantages of the sites location on Main Street in terms of its visibility and proximity to SR 22.
- Develop the vacant project site with land uses to help meet the residential needs in the northeastern part of the City of Santa Ana.
- Provide a long-term development that is of the highest architectural quality and design.
- Provide a landscaping plan that is complementary to the project.
- Provide an exciting and visually cohesive development as viewed both internally and externally.
- Provide development that is consistent with the District Center designation of the General Plan and which implements the spirit and intent and policies of the General Plan.
- Provide concentrated and internally integrated development rather than development that spreads activities into adjacent residential neighborhoods.
- Provide a development that provides special design themes which are expressed in building appearance and configuration, street and pedestrian area design, landscaping, lighting and signage, and also provides for pedestrian linkages internally and to the surrounding neighborhood, traffic and service buffering and transitions in architectural scale and character.
- Provide off-street parking sufficient to service the development, consistent with uses contained in the project.
- Include the provision or replacement of public streets, sidewalks, sewers, storm drains, traffic signals, lighting systems, and other public facilities and improvements, as necessary.
- Maintain the existing streetscape pattern including sidewalk design, mature trees and light fixtures.
- Introduce a mixture of multi-family housing types to the district.
- Maximize the residential density of the vacant lot in City Place to support the purpose of the General Plan designation of District Center, which is intended for high intensity development.

### **9.6.2 ASSESSMENT OF ALTERNATIVES ABILITY TO MEET THE DEFINED PROJECT OBJECTIVES**

The ability of each project alternative and the proposed project to meet the defined City and applicant objective for the proposed project is discussed in the following sections.

#### **9.6.2.1 Ability of the No Project/Existing Conditions Alternative to Meet the Project Objectives**

This No Project Alternative would not meet any of the objectives for the proposed project. It would not develop the vacant project site with land uses to serve residential needs in this part of the City. Therefore, the No Project/Existing Conditions Alternative is inferior to the proposed project.

### 9.6.2.2 Ability of the No Project/Existing Entitlement Alternative to Meet the Project Objectives

This No Project Alternative would not meet any of the objectives for the proposed project. The construction of only two residential dwellings would not satisfy residential needs. Although, development would be consistent with the general plan and zoning designations, as well as result in less environmental impacts, the No Project/Existing Entitlement Alternative would not satisfy project objectives and, therefore, is inferior to the proposed project.

### 9.6.2.3 Ability of the Town Home Alternative to Meet the Project Objectives

This Town Home Alternative would meet all the project objectives. However, this Alternative would provide 296 fewer dwelling units than the proposed project, and therefore would not address housing needs as effectively as the proposed project.

## 9.7 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Section 15126.6(e)(2) of the CEQA Guidelines requires that an EIR identify the environmentally superior alternative. If the No Project Alternative is the environmentally superior alternative, the EIR must identify an environmentally superior alternative among the remaining alternatives.

As shown in Table 9-1, the proposed project is anticipated to result in significant unavoidable adverse impacts related to:

- Aesthetics
- Air Quality
- Traffic

The No Project/Existing Conditions Alternative is not anticipated to result in any significant unavoidable adverse impacts because it does not propose any development on the project site.

The No Project/Existing Entitlement Alternative is not anticipated to result in any unavoidable adverse impacts, and impacts would be substantially less than under the proposed project because of the substantially reduced amount of development on the project site under this Alternative.

The Town Home Alternative would result in less-than-significant impacts except for potential short-term traffic impacts. All impacts of the Town Home Alternative would be less than under the proposed project because this Alternative would result in less intense development on the project site.

As shown in Table 9-1, because the No Project/Existing Conditions Alternative and No Project/Existing Entitlement Alternative do not result in any significant unavoidable adverse impacts and would result in even less impacts than the Town Home Alternative, they are the environmentally superior alternatives. CEQA requires the identification of an additional feasible environmentally superior alternative when the No Project Alternative is determined to be the environmentally superior alternative. Many of the environmental impacts of the proposed project and the project Alternatives are directly related to the size or intensity of the development and, in general, projects of higher intensity will generally result in more adverse impacts compared to alternatives of a lower intensity. As shown in Table 9-1, the Town Home Alternative would result in fewer significant unavoidable adverse impacts than the proposed project. Therefore, of the build alternatives, the Town Home Alternative is the environmentally superior alternative.

**TABLE 9-1  
COMPARISON OF THE IMPACTS OF THE CITY PLACE SKY LOFTS PROJECT  
AND THE PROJECT ALTERNATIVES**

<b>IMPACT CATEGORY</b>	<b>PROPOSED CITY PLACE SKY LOFTS PROJECT</b>	<b>NO PROJECT/ EXISTING CONDITIONS</b>	<b>NO PROJECT/ EXISTING ENTITLEMENT</b>	<b>TOWN HOME ALTERNATIVE</b>
<b>Aesthetics</b>	Significant adverse impact due to building shadow upon residential uses east of Lawson Way and southeast of Memory Lane during late afternoon and early evening of spring and summer months.	No impact.	Impacts to aesthetics would be below a level of significance and would be substantially less than the proposed project.	Impacts to aesthetics would be below a level of significance and would be less than the proposed project.
<b>Air Quality</b>	Unavoidable adverse impact of ROG emissions during the proposed project operational phase.	No impact.	Impacts to air quality would be below a level of significance and would be substantially less than the proposed project.	Impacts to air quality would be below a level of significance and would be less than the proposed project.
<b>Cultural Resources</b>	Impacts to cultural resources would be below a level of significance with implementation of mitigation measures.	No impact.	Impacts to cultural resources would be below a level of significance with mitigation. However, impacts would be less than the proposed project.	Similar as under the proposed project; however, the potential for encountering subsurface materials would be less than the proposed project.
<b>Geology and Soils</b>	Impacts to geology and soils would be below a level of significance with implementation of mitigation measures.	No impact.	Impacts to geology and soils would be below a level of significance with mitigation. However, the potential for differential settlement would be less than the proposed project.	Similar impacts as under the proposed project; however, impacts would be less than the proposed project.
<b>Hazardous Materials</b>	The potential impacts of the proposed project related to the abandoned jet fuel line would be below a level of significance.	No impact.	The potential impacts related to the abandoned jet fuel line would be below a level of significance and would be the same as the proposed project.	Similar impacts as under the proposed project.

**TABLE 9-1  
COMPARISON OF THE IMPACTS OF THE CITY PLACE SKY LOFTS PROJECT  
AND THE PROJECT ALTERNATIVES**

<b>IMPACT CATEGORY</b>	<b>PROPOSED CITY PLACE SKY LOFTS PROJECT</b>	<b>NO PROJECT/ EXISTING CONDITIONS</b>	<b>NO PROJECT/ EXISTING ENTITLEMENT</b>	<b>TOWN HOME ALTERNATIVE</b>
<b>Hydrology and Water Quality</b>	Impacts to hydrology and water quality would be below a level of significance with implementation of mitigation measures.	No impact.	Impacts to hydrology and water quality would be below a level of significance with implementation of mitigation and would be the same as the proposed project.	Similar impacts as under the proposed project; however, impacts would be less than the proposed project.
<b>Land Use</b>	<b>Impacts related to land use would be below a level of significance.</b>	No impact.	Impacts related to land use would be below a level of significance and would be similar to the proposed project.	Impacts related to land use would be below a level of significance and would be similar to the proposed project.
<b>Noise</b>	Impacts related to noise would be below a level of significance with implementation of mitigation measures.	No impact.	Impacts related to noise would be below a level of significance with implementation of mitigation measures and would be substantially less than the proposed project.	Similar impacts as under the proposed project; however, impacts would be less than the proposed project.
<b>Population and Housing</b>	Impacts related to population and housing would be below a level of significance.	No impact.	Impacts related to population and housing would be below a level of significance and would be substantially less than the proposed project.	Similar impacts as under the proposed project; however, impacts would be less than the proposed project.
<b>Public Services</b>	Impacts to public services would be below a level of significance.	No impact.	Impacts related to public services would be below a level of significance and would be substantially less than the proposed project.	Similar impacts as under the proposed project; however, impacts would be less than the proposed project.
<b>Recreation</b>	Impacts to recreation would be below a level of significance with implementation of mitigation measures.	No impact.	Impacts related to public services would be below a level of significance with mitigation and would be substantially less than the proposed project.	Similar impacts as under the proposed project; however, impacts would be less than the proposed project.

**TABLE 9-1  
COMPARISON OF THE IMPACTS OF THE CITY PLACE SKY LOFTS PROJECT  
AND THE PROJECT ALTERNATIVES**

<b>IMPACT CATEGORY</b>	<b>PROPOSED CITY PLACE SKY LOFTS PROJECT</b>	<b>NO PROJECT/ EXISTING CONDITIONS</b>	<b>NO PROJECT/ EXISTING ENTITLEMENT</b>	<b>TOWN HOME ALTERNATIVE</b>
<b>Transportation and Traffic</b>	A temporary significant and unavoidable adverse impact to Main Street between La Veta Avenue and Town & Country Road until Bristol Street and Grand Avenue is built out to the MPAH designations. Other impacts to transportation and traffic would be below a level of significance with implementation of mitigation measures.	No impact.	Potential short-term impacts to transportation and traffic would be below a level of significance and would be substantially less than the proposed project.	Impacts to transportation and traffic would be below a level of significance and would be less than the proposed project.
<b>Utilities and Service Systems</b>	Impacts to utilities and service systems would be below a level of significance with implementation of mitigation measures.	No Impact.	Impacts related to utilities and service systems would be below a level of significance and would be substantially less than the proposed project.	Similar impacts as under the proposed project; however, impacts would be less than the proposed project.

**9.8 ALTERNATIVES COMPARISON**

**9.8.1 ABILITY TO MEET THE PROJECT OBJECTIVES**

The proposed project meets all the defined project objectives. The Town Home Alternative meets all but one of the project objectives. Both the No Project Alternatives fail to meet any of the defined project objectives.

**9.8.2 ELIMINATION AND/OR REDUCTION OF SIGNIFICANT ADVERSE IMPACTS**

The No Project/Existing Conditions Alternative does not meet any of the defined project objectives. However, this Alternative does avoid all the significant adverse impacts of the proposed project and other project alternatives because site conditions would remain as is.

The No Project/Existing Entitlements Alternative fails to meet any of the defined project objectives. However, the impacts of this Alternative would be substantially less than the impacts under the proposed project because this Alternative would result in a substantial reduction of development on the project site. Therefore, this Alternative would eliminate the adverse impacts associated with the proposed project and would result in substantially less impacts than under the proposed project.

The Town Home Alternative meets all but one of the defined project objectives, has only one potentially significant adverse impact, related to traffic, and would result in less impact than under the proposed project because this Alternative would result in less development on the project site. Therefore, this Alternative would eliminate the significant adverse aesthetics, air quality, and traffic impacts associated with the proposed project and would result in less impacts than under the proposed project. However, this alternative fails to meet the project objectives to maximize the residential density of the vacant lot in City Place to support the purpose of the General Plan designation of District Center, which is intended for high intensity development.

In summary, the proposed project meets the project objectives and is environmentally inferior to the other alternatives. The No Project Alternatives are the environmentally superior alternative. The Town Home Alternative fails to meet one of the project objectives and is environmentally superior to the proposed project although it is environmental inferior to the No Project Alternatives.