

CHAPTER 5 Alternatives

5.1 INTRODUCTION

The following discussion evaluates alternatives to the proposed Transit Zoning Code (SD 84A and SD 84B) and examines the potential environmental impacts associated with each alternative. Through comparison of these alternatives to the Transit Zoning Code (SD 84A and SD 84B), the relative environmental advantages and disadvantages of each are weighed and analyzed. The California Environmental Quality Act (CEQA) Guidelines require that the range of alternatives addressed in an EIR be governed by a rule of reason. Not every conceivable alternative must be addressed, nor do infeasible alternatives need to be considered (CEQA Guidelines Section 15126.6). Section 15126.6 of the CEQA Guidelines states that the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, other plans or regulatory limitations, and jurisdictional boundaries. The discussion of alternatives must focus on alternatives capable of either avoiding or substantially lessening any significant environmental effects of the project, even if the alternative would impede, to some degree, the attainment of the project objectives or would be more costly. The alternatives discussion should not consider alternatives whose implementation is remote or speculative, and the analysis need not be presented in the same level of detail as the assessment of the project.

In considering the certification of the EIR and the adoption of any project alternatives, particularly those alternatives that are based on a subset of the overall project, the City Council may choose to select one or more alternatives in addition to approving the original project.

As identified in Section 3.2 (Project Objectives), the objectives of the Transit Zoning Code are to:

- Provide zoning for the integration of new infill development into existing neighborhoods
- Provide for a range of housing options, including affordable housing
- Allow for the reuse of existing structures
- Allow the development of the Agency properties (described further under Developer Project Objectives)
- Provide a transit-supportive, pedestrian-oriented development framework to support the addition of new transit infrastructure
- Preserve and reinforce the existing character and pedestrian nature of the City by strengthening urban form through improved development and design standards
- Encourage alternative modes of transportation, including the rail system that connects San Diego to Los Angeles.

The objectives of the Developer Project for the Agency Properties are to:

- Redevelop all of the Agency-owned properties
- Provide new affordable housing for families in furtherance of the City’s affordable housing goals established in the Housing Element, the Implementation Plan for the Santa Ana Merged Redevelopment Project Area, and the City of Santa Ana Consolidated Plan.
- Enhance the streetscape and urban form of the area, particularly along Santa Ana Boulevard, with the construction of new buildings that meet the standards contained in the Transit Zoning Code and that support future transit planning
- Eliminate blight
- Provide additional public open space and facilitate joint use arrangement with SAUSD for a new community center
- Provide an economically viable redevelopment scenario for the Agency-owned properties

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

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

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

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

... set[ting] forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision-making.

5.2 ALTERNATIVES NOT EVALUATED IN THIS EIR

1. Alternative Site – As the Transit Zoning Code (SD 84A and SD 84B) is designed to guide the development of a particular portion of the City through a plan that is aimed at developing transit-

oriented development near existing and planned transit, an alternative site would not be appropriate as an alternative to the proposed project. Other land uses, such as all-residential, would not achieve the objectives of the proposed project and could result in incompatibility with adjacent land uses. All-residential development would not attract a wide range of activities to maintain a dynamic atmosphere for the Transit Zoning Code (SD 84A and SD 84B). In addition, an alternative site for the redevelopment of the Agency properties would not be possible because the land itself is located in a particular place and could not be moved. Therefore, these alternatives were rejected from further analysis in the EIR because they do not meet the objectives of the proposed project listed above.

2. Rehabilitation of Potential New Acquisitions – As referenced in Figure 3-6 the Redevelopment Agency may be pursuing additional acquisitions within the project area in order to complete blocks where the Agency already has an ownership interest, as well as to provide for new open space. It is anticipated that, to the extent that there are existing structures on these properties, the structures would be demolished in order to achieve the project objectives. An alternative to demolishing these properties would be to acquire them and rehabilitate them in place. This alternative was not analyzed due to the fact that, were demolition precluded for these properties, the Agency would not pursue their acquisition. Further, the project objectives do not include the rehabilitation of existing structures. For these reasons this alternative was not considered for further analysis.

5.3 ALTERNATIVES ANALYSIS

Six scenarios, representing a range of reasonable alternatives to the proposed project were selected for detailed analysis. The goal for evaluating any of these alternatives is to identify ways to avoid or lessen the significant environmental effects resulting from implementation of the proposed project, while attaining most of the project objectives. While a “No Project/No Build” scenario was considered, as the Transit Zoning Code (SD 84A and SD 84B) horizon year is 2030, it is extremely unlikely that development would not occur in the Transit Zoning Code (SD 84A and SD 84B) area. Alternatives selected for further analysis include the following:

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

Methodology for Selection of Alternative 1: This alternative evaluates the environmental effects of buildout of the Transit Zoning Code (SD 84A and SD 84B) according to the existing General Plan and zoning, which allows the decision-makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project. Therefore, under Alternative 1, the impacts of the proposed project are compared to the impacts that would occur if the existing General Plan were implemented in the Transit Zoning Code (SD 84A and SD 84B) area.

- **Alternative 2—Overall Reduced Density Alternative:** This alternative would permit a 25% overall reduction in land use intensity. In general, this alternative would reduce the overall number of residences and commercial uses in the area.

Methodology for Selection of Alternative 2: This alternative would result in approximately 1,019 fewer residential units, and 96,750 fewer square feet of retail within the Transit Zoning Code (SD 84A and SD 84B) area, which would reduce some of the significant impacts of the proposed project.

- **Alternative 3—Low-Rise Project:** This alternative would limit building heights in the Downtown and Transit Village Districts to 4 stories. This would result in 2,049 fewer residential units and 36,000 fewer sf of retail uses. The anticipated mix of land uses would therefore be different than the proposed project, and a less residential based area would result.

Methodology for Selection of Alternative 3: Because this alternative would allow building heights that are similar to existing buildings in the area, the alternative would ensure future development would have less shade/shadow impacts, as well as generate fewer automobile trips.

- **Alternative 4 – Rehabilitate in Place/Acquire No Additional Properties:** This alternative would eliminate the demolition of the structures currently existing on the Agency-owned properties identified in Figure 5-1 (Demolitions) and would instead require that those properties be retained and rehabilitated in their current locations. In addition, this alternative would eliminate any new potential acquisitions as identified in Figure 5-2 (Potential New Santa Ana Redevelopment Agency Acquisitions). This Alternative would result in 88 rental units and 25 ownership residential units.

Methodology for Selection of Alternative 4: Because this alternative would eliminate the demolition of potentially historic resources on the Agency-owned properties, and would also eliminate the potential for new demolitions, the alternative would have fewer impacts to historic resources.

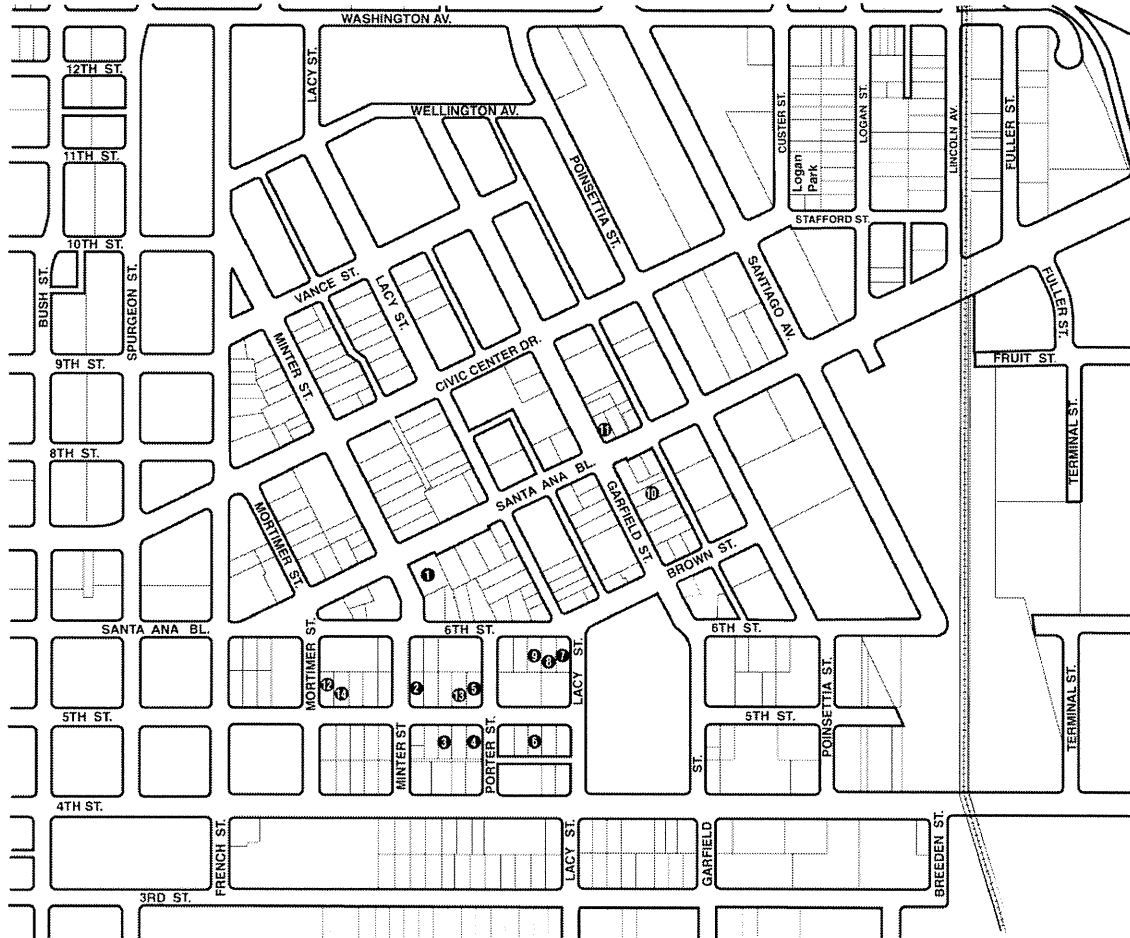
- **Alternative 5 – Relocate and Rehabilitate on Agency-Owned Infill Sites:** This alternative would reduce the demolition of properties owned by the Redevelopment Agency. Under this alternative the properties identified in Figure 3-5 (Santa Ana Redevelopment Agency Parcels) and Figure 5-2 (Potential New Santa Ana Redevelopment Agency Acquisitions), which includes the properties that are proposed for demolition shown in Figure 5-1 (Demolitions), would be rehabilitated in place, moved to vacant lots and rehabilitated, or demolished. Further the property located at 611 N. Minter Street would be demolished. Following a comprehensive historic survey of the properties, the City’s Historic Resources Commission would evaluate all of the structures to determine their eligibility for listing on the City’s Register of Historical Properties and would make recommendations regarding the selection of houses to be moved and onto which sites they should be moved. This Alternative would result in 138 rental units and 22 ownership residential units.

Methodology for Selection of Alternative 5: This alternative would significantly reduce the number of demolitions on both the current Agency-owned properties, as well as those identified as potential acquisitions. This alternative would instead cluster houses along 5th Street to create an historic block by filling in vacant sites currently owned by the Agency with houses moved from other sites. Because this alternative would significantly reduce the demolition of potentially historic resources on the Agency-owned properties, and would also reduce the potential for new demolitions, the alternative would have fewer impacts to historic resources.

- **Alternative 6 – Rehabilitate 611 N. Minter St. in Place:** This alternative would retain the structures located at 611 N. Minter St. and require that they be rehabilitated in place. This property is identified as Property #17 in Figure 3-5 (Santa Ana Redevelopment Agency Parcels). This Alternative would result in 101 rental units and 39 ownership residential units.

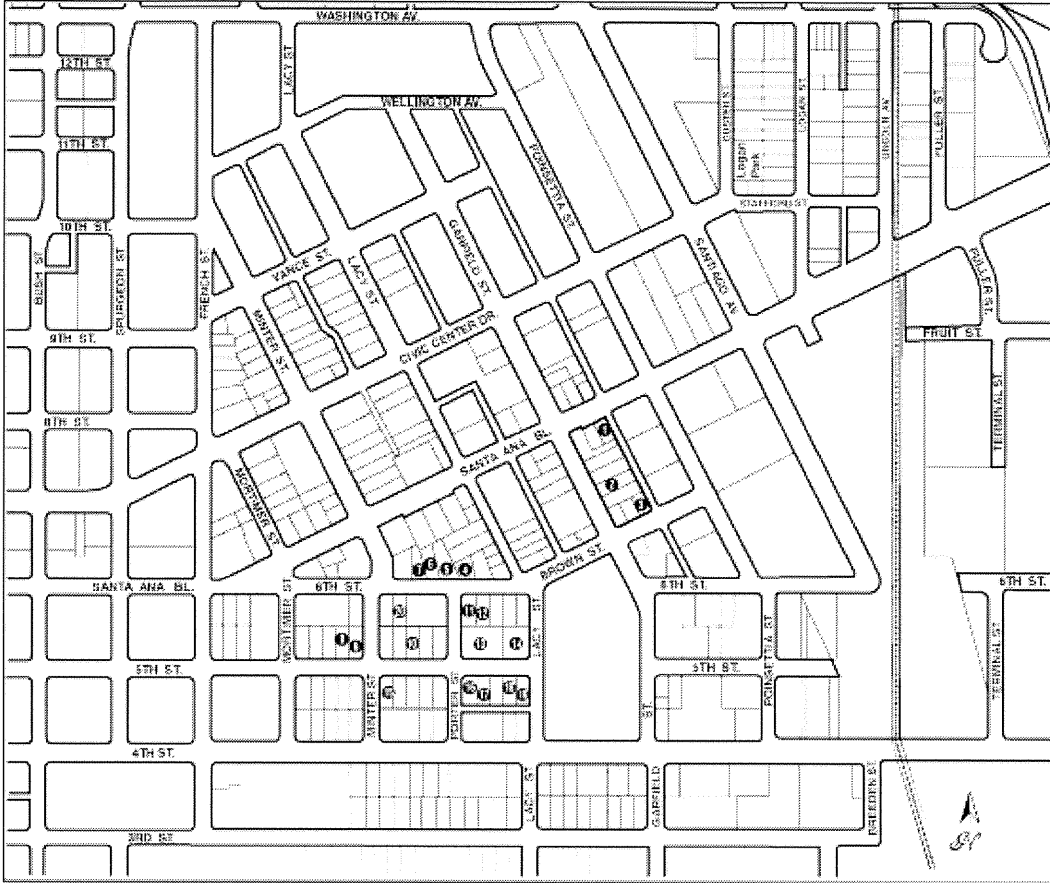
Methodology for Selection of Alternative 6: Because this alternative would eliminate the demolition of a potential historic resource it would result in a lesser impact to historic resources.

Figure 5-1: Demolitions



- | | | |
|-------------------------|---------------------------|--------------------------------|
| 1 611 N. Minter St. | 7 720 E. Sixth St. | ● Agency Parcels |
| 2 505 N. Minter St. | 8 714 E. Sixth St. | — Transit Zoning Code Boundary |
| 507 N. Minter St. | 9 710 E. Sixth St. | |
| 601-603 E. Fifth St. | 10 623 N. Garfield St. | |
| 3 610-612 E. Fifth St. | 11 801 E. Santa Ana Blvd. | |
| 4 620 E. Fifth St. | 707 N. Garfield St. | |
| 5 621 E. Fifth St. | 12 501 E. Fifth Street | |
| 508 & 510 N. Porter St. | 13 615 E. Fifth Street | |
| 6 712 E. Fifth St. | 14 505 E. Fifth Street | |

Figure 5-2: Potential New Santa Ana Redevelopment Agency Acquisitions



Potential Agency/City Acquisitions

● Potential Acquisitions

1	812	E. Santa Ana Blvd.	11	702	E. Sixth St.
2	611	N. Garfield St.	12	706	E. Sixth St.
3	911	Brown St.	13	701	E. Fifth St.
4	617	E. Sixth St.	14	713	E. Fifth St.
5	613	E. Sixth St.	15	602	E. Fifth St.
6	609	E. Sixth St.	16	409	N. Minter St.
7	607	E. Sixth St.	17	708	E. Fifth St.
8	515	E. Fifth St.	18	716	E. Fifth St.
9	519	E. Fifth St.	19	720	E. Fifth St.
10	609	E. Fifth St.	20	610	E. Sixth St.

2/12/10

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

■ Description

Implementation of the No Project/Reasonably Foreseeable Development Alternative would represent the continuation of the City’s existing General Plan and zoning designations to guide future growth and development within the project area. Under the City’s existing zoning, there are fifteen different commercial/professional/residential/special zones located within the Transit Zoning Code (SD 84A and SD 84B) area: Community Commercial (C1), General Commercial (C-2), Central Business (C-3), Central Business-Artists Village (C-3A), Planned Shopping Center (C4), Arterial Commercial (C-5), Government Center (GC), Open Space (O), Light Industrial (M1), Heavy Industrial (M2), Professional (P), Single Family Residence (R1), Two Family Residence (R2), Multiple Family Residential (R3), and Specific Development (SD19, SD21, SD30, SD37, and SD71). For this alternative, impacts would be analyzed under a maximum buildout scenario within the project area with the allowed land uses and development standards designated in the existing General Plan and zoning designations.

■ Impacts

Aesthetics

The types of impacts associated with the obstruction/alteration of scenic resources within a State- or locally designated scenic highway, degradation of scenic vistas, changes in visual character and quality, and increased light and glare would be roughly similar to the proposed project under this alternative (with a few minor exceptions), as the overall character of the Transit Zoning Code (SD 84A and SD 84B) area would continue to experience new development.

Similar to the proposed project, because the Transit Zoning Code (SD 84A and SD 84B) area is neither located proximate to a State-designated highway nor within a designated view corridor associated with a State scenic highway, implementation of this alternative would have ***no impact*** on scenic resources within a State scenic highway view corridor.

Similar to the proposed project, this alternative could result in obstruction of views of a scenic vista and/or focal views of places of public interest (e.g., historic resources, public art, or landmarks). Views of mountain ranges from within the Transit Zoning Code (SD 84A and SD 84B) area are generally taken from viewsheds looking down street corridors, between existing buildings, as existing buildings block or obstruct the views from other locations within and around the Transit Zoning Code (SD 84A and SD 84B) area. Similar to the proposed project, this alternative would not develop new structures within street rights-of-way. Policies outlined in the existing General Plan would still protect scenic vistas and vistas in the City, and this impact would be ***less than significant***.

Development under the existing General Plan would result in changes to the visual character and quality of the Transit Zoning Code (SD 84A and SD 84B) area. Similar to the proposed project, visual conditions associated with construction activities under this alternative would be temporary visual distractions typically associated with construction activities and equipment. As such, construction-related visual impacts associated with this alternative are considered *less than significant*, and would be similar to the proposed project. Development under the existing General Plan would restrict the potential building heights of structures within the Transit Zoning Code (SD 84A and SD 84B) area beyond the proposed project which could result in lesser changes to the visual character and quality of the Transit Zoning Code (SD 84A and SD 84B) area. However, with implementation of architectural review and design guidelines contained in the General Plan and the Citywide Design Guidelines, this impact would remain *less than significant*, similar to the proposed project, although slightly less.

In addition, light and glare would also be expected to increase with full buildout of the existing General Plan, as described for the proposed project. The proposed project includes mitigation measures to ensure that future project design features would be developed to ensure that lighting and glare impacts from specific development projects would remain at less-than-significant levels. In consideration of already-substantial existing ambient lighting and glare in the Transit Zoning Code (SD 84A and SD 84B) area, adverse environmental impacts from increased light and glare associated with this alternative are anticipated to be *less than significant*, but would be greater than the proposed project due to the absence of the proposed project's mitigation measures.

Similar to the proposed project, new sources of increased shade would likely result from new development under this alternative. However, under this alternative, the potential height of structures developed as part of this alternative would be similar to existing conditions. As a result, the level of shadows that would exist in the project area upon implementation of this alternative would not be expected to substantially increase the level of shadows cast within the Transit Zoning Code (SD 84A and SD 84B) area. As a result, impacts are anticipated to be *less than significant*, and less than those that could be constructed in certain areas of the Transit Zoning Code due to lesser potential building heights and densities under the proposed project.

Air Quality

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

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

Although total air emissions may be less than the proposed project, impacts related to operation of projects under the existing General Plan and Zoning Ordinance as well as the project's contribution to an existing air quality violation would be ***significant and unavoidable***, similar to the proposed project.

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

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

Biological Resources

As described in the Environmental Setting, the majority of the project area has been developed, paved, or landscaped and supports largely nonnative plant species. Suitable habitat for sensitive mammal, reptile, amphibian, or fish species does not exist within the Transit Zoning Code (SD 84A and SD 84B) or adjacent areas, and there are no wildlife migration corridors. In addition, no threatened, endangered, or sensitive species have been reported to occur within the Transit Zoning Code (SD 84A and SD 84B). Impacts would be ***less than significant***, similar to the proposed project.

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

Cultural Resources

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

Because development could still occur within the project area, regardless of its intensity or type, the potential demolition or alteration of historic structures could still occur. Because the potential exists for

development to result in the removal/loss of a historic structure within the Transit Zoning Code (SD 84A and SD 84B) area, impacts under this alternative would be considered ***significant and unavoidable***, similar to the proposed project.

Geology and Soils

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

Global Climate Change

Under this alternative, development intensity would be lesser, thereby potentially fewer automobile trips might occur. In addition, the burning of combustible materials for heat, need for electricity would be expected to be reduced. However, development under this alternative would still likely be similar to the proposed project and remain ***significant and unavoidable***, similar to the proposed project

Hazards

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

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

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

Hydrology and Water Quality

Implementation of this alternative would not result in significant impacts to hydrology or water quality. Less development would occur, thereby reducing hydrology and water quality impacts. Although the total amount of development could differ from the proposed project under this alternative, similar alterations to drainage patterns, discharge of pollutants and alterations to hydrological patterns would occur. Runoff would be subject to NPDES permit standards. If necessary, treatment would be employed by individual projects to remove excess pollutants from runoff during the construction and operational phases of development. In terms of water quality, this alternative would have a ***less-than-significant*** impact, similar to the proposed project.

As the Transit Zoning Code (SD 84A and SD 84B) area does not include any significant recharge areas, depletion of groundwater and percolation of pollutants into groundwater aquifers would be ***less than significant***, similar to the proposed project.

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

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

Land Use

Existing land uses within the Transit Zoning Code (SD 84A and SD 84B) consist primarily of industrial, institutional, and district center, with some commercial and residential. Development under this alternative would continue this trend. Inconsistencies between this alternative and the existing applicable land use plans governing development of the proposed project area would not occur, and would not require amendments to the General Plan and Zoning Code, which the proposed project would. However, the existing General Plan/Zoning inconsistencies present throughout the project area would continue. Implementation of this alternative would not alter the types or densities of the uses within the Transit Zoning Code (SD 84A and SD 84B) area. Integrated and cohesive development standards for the Transit Zoning Code (SD 84A and SD 84B) area would not be implemented as proposed under the Transit Zoning Code (SD 84A and SD 84B). On the whole, impacts would be ***less than significant*** under this alternative, and less than the proposed project.

Noise

Under Alternative 1, future development would involve a less intense development within the Transit Zoning Code (SD 84A and SD 84B) area. As a result, impacts would be less than the proposed project. Since the proposed project determined a less than significant impact with respect to operational noise, this alternative would not be anticipated to expose sensitive receptors in the project area to excessive noise levels, and impacts would remain ***less than significant***.

Similar to the proposed project, construction activities under this alternative would be subject to the City's Municipal Code standards, and construction noise would be controlled. This impact would be ***less than significant***, similar to the proposed project. Nonetheless, the potential for sensitive receptors to be subject to excessive vibration during construction would remain, similar to the proposed project, and would be considered ***significant and unavoidable***. Impacts related to noise from the AT & SF railroad would still occur under this alternative since it does not affect the current use of trains. This impact would be considered ***significant and unavoidable***.

Population and Housing

Development proposed under this alternative would not involve any increase in excess of the projected population growth as set forth by SCAG forecasting, which relies on (among other factors) established land uses at the local jurisdictional level, including but limited to, local general plans. Therefore, since this alternative assumes buildout of the existing general plan, it would therefore be in conformance thereto, and have a lesser impact than the project. ***No impacts*** would occur.

Public Services

Development under this alternative would result in less of an increase in new residents to the City at buildout when compared to the proposed project due to the lack of a direct population increase within the Transit Zoning Code (SD 84A and SD 84B) area. The firefighter to population service ratio would be substantially similar to the proposed project, as fire protection needs would be required for existing and proposed uses under this alternative. The same holds true for police protection, as the police officer to population service ratio would be substantially similar to what is currently projected under the proposed project. As a result, impacts to fire and police services would be ***less than significant***.

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

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

Transportation

As development under this alternative would involve an intensification of uses, traffic volumes along local street segments are anticipated to increase. The impacts to intersections would remain potentially significant. While development under this alternative would likely include several roadway improvements, similar to the proposed project, it does not include the emphasis on alternative modes of transportation. Therefore, impacts would be considered to be greater than the proposed project. Nonetheless, impacts resulting from implementation of this alternative would be anticipated to be ***significant and unavoidable*** despite the roadway improvements that would be required as development occurs within the Transit Zoning Code (SD 84A and SD 84B) area. As buildout of both the proposed project and this alternative would both be subject to City code in regards to parking, impacts to parking would be similar

to the proposed project and *less than significant*. Impacts to emergency access would comply with existing policies contained in the General Plan and Municipal Code, and would be *less than significant*, similar to the proposed project.

Utilities

The existing project area is substantially built out and highly urbanized. Development under the No Project/Reasonably Foreseeable Alternative would not likely develop many uses of substantially greater intensity or density due to current zoning restrictions. Where newly re-developed areas under the existing general plan occur, the demand for utilities may increase commensurately. However any increase would be substantially less than the proposed project. As the increase in demand would be less than under the proposed project, impacts would be *less than significant*.

5.3.3 Alternative 2—Overall Reduced Density

■ **Description**

The Overall Reduced Alternative involves reducing the intensity of all anticipated uses within the Transit Zoning Code (SD 84A and SD 84B) area by 25 percent. In general, this alternative would reduce the number of residences and reduce employment opportunities as a result of less commercial uses in the area. Specific development characteristics that would be allowed under this alternative relative to the proposed Transit Zoning Code (SD 84A and SD 84B) are specified in Table 5-1 (Alternative 2 and Proposed Transit Zoning Code [SD 84A and SD 84B] Characteristics).

Table 5-1 Alternative 2 and Proposed Transit Zoning Code (SD 84A and SD 84B) Characteristics			
<i>Land Use Type</i>	<i>Alternative 2</i>	<i>Transit Zoning Code (SD 84A and SD 84B)</i>	<i>Difference</i>
Residential (units)	3,056	4,075	(1,019)
Retail (sf)	290,250	387,000	(96,750)
Industrial (sf)	(990,000)	(990,000)	0
Commercial (sf)	(124,000)	(124,000)	0
Civic (sf)	(21,000)	(21,000)	0
Green (sf)	680,000	680,000	0
Parking	(1,772,000)	(1,772,000)	0

SOURCE: PBS&J 2010

■ **Impacts**

Aesthetics

The types of impacts associated with obstruction/alteration of scenic resources within a State- or locally designated scenic highway, degradation of scenic vistas, changes in visual character and quality, and

increased light and glare would be roughly similar to the proposed project under this alternative (with a few minor exceptions), as the overall character of the project area at buildout would be similar. Similar changes could occur throughout the project area, specifically in the Transit Village District, and development would be subject to the same policies, standards, and guidelines as presented in the proposed project.

Similar to the proposed project, because the Transit Zoning Code (SD 84A and SD 84B) area is neither located proximate to a State-designated highway, nor within a designated view corridor associated with a State scenic highway, implementation of this alternative would have ***no impact*** on scenic resources within a State scenic highway view corridor.

Similar to the proposed project, this alternative could result in obstruction of views of a scenic vista and/or focal views of places of public interest (e.g., historic resources, public art, or landmarks). Views of mountain ranges from within the Transit Zoning Code (SD 84A and SD 84B) area are generally taken from viewsheds looking down street corridors, between existing buildings. Similar to the proposed project, this alternative would not develop new structures within street rights-of-ways so existing viewsheds would not be blocked and views of the mountains from within the Transit Zoning Code (SD 84A and SD 84B) area would be preserved. Since development under this alternative would be likely be similar in height to those structures under the proposed project, the impacts upon scenic vistas of mountains from this alternative would also be similar to the proposed project and are considered ***less than significant***.

Development under this alternative would result in changes to the visual character and quality of the Transit Zoning Code (SD 84A and SD 84B) area. Similar to the proposed project, this alternative could temporarily adversely alter visual conditions associated with construction activities and equipment. As such, construction-related visual impacts associated with this alternative are considered ***less than significant***, and would be equal to the proposed project.

This alternative would result in permanent impacts to the visual character or quality of the Transit Zoning Code (SD 84A and SD 84B) area. With implementation of design guidelines, including landscaped areas and masonry buffers, the new development proposed under this alternative would generally improve the visual character of the Transit Zoning Code (SD 84A and SD 84B) and surrounding areas. The visual quality impacts of this alternative would be considered ***less than significant***, similar to the proposed project.

Light and glare would also be expected to increase with implementation of this alternative, similar to the proposed project. This alternative includes the same mitigation measures applicable to the proposed project to ensure that future project design features would be developed to ensure that lighting and glare impacts from specific development projects would remain at less than significant levels. In consideration of already-substantial existing ambient lighting and glare in the Transit Zoning Code (SD 84A and SD 84B) area, adverse environmental impacts from increased light and glare associated with this alternative are anticipated to be ***less than significant***.

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

Similar to the proposed project, new sources of increased shade would likely result from new development under this alternative. Based on the land uses adjacent to the Transit Zoning Code (SD 84A and SD 84B), there would be potential impacts to sensitive receptors as a result of increased development. Impacts would be *significant and unavoidable*, but less than the proposed project due to a decrease in residential units within the vicinity of the Transit Village District, which would allow for structures up to twenty stories in height.

Air Quality

Implementation of this alternative would provide new sources of regional air emissions. However, it was determined that the proposed project would not conflict with, and impair, implementation of the Air Quality Management Plan (AQMP). Implementation of Alternative 2 would result in substantially (25 percent) less commercial and residential development than the proposed project. Because future population levels would be consistent with SCAG projections, this alternative would also be considered consistent with the 2007 AQMP. Similar to the proposed project, this impact would be considered *less than significant*.

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

Similar to the proposed project, operation of projects under this alternative would exceed the daily thresholds for criteria pollutants. The alternative would also contribute to an existing air quality violation. Therefore, impacts remain *significant and unavoidable*.

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

Biological Resources

As described in the Environmental Setting, the majority of the project area has been developed, paved, or landscaped and supports largely non-native plant species. Suitable habitat for sensitive mammal, reptile, amphibian, or fish species does not exist within the Transit Zoning Code (SD 84A and SD 84B) or adjacent areas, and there are no wildlife migration corridors. In addition, no threatened, endangered, or sensitive species have been reported to occur within the Transit Zoning Code (SD 84A and SD 84B) area. Impacts would be *less than significant*, similar to the proposed project.

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

Cultural Resources

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

Because development could still occur on the same parcels within the Transit Zoning Code (SD 84A and SD 84B) area, regardless of its intensity, the potential demolition of historic structures could still occur. Even though the mitigation measures associated with protection of historic resources for the proposed project would apply, it is anticipated that impacts under this alternative would be *significant and unavoidable*, similar to the proposed project.

Geology and Soils

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

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

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

Global Climate Change

Under this alternative, development intensity would be lesser, thereby potentially fewer automobile trips might occur. In addition, the burning of combustible materials for heat, need for electricity would be expected to be reduced. However, development under this alternative would still likely be similar to the proposed project and remain **significant and unavoidable**.

Hazards

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

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

Similar to the proposed project, under this alternative, the City would be required to create an updated emergency response plan for the project area to ensure adequate emergency access and evacuation. Site plans for future development within the Transit Zoning Code (SD 84A and SD 84B) area would be reviewed by the Santa Ana Fire Department as well as the City of Santa Ana Planning Department to ensure adequate police, ambulance, and fire personnel access to the proposed project area. In addition, future developments would likely require further environmental analysis under CEQA which would include impact analysis of fire, police, and ambulance access. Traffic impacts within the Transit Zoning Code (SD 84A and SD 84B) area which could impact response plans and evacuation plans would be required to be mitigated to less than significant levels. After implementation of identified mitigation measures for the proposed project, development initiated under this alternative would not interfere with any emergency response or evacuation plans. This impact is considered **less than significant**, similar to the proposed project.

Although projects within the Transit Zoning Code (SD 84A and SD 84B) area listed in Alternative 2 would involve the use of some hazardous materials within the Transit Zoning Code (SD 84A and SD 84B) area, applicable laws regarding upset and accident preparation and response would continue to be implemented as required in the proposed project. Existing regulations would be expected to minimize the potential for exposure to adverse health or safety effects. Therefore, development under this alternative would not involve the use of materials in a manner that poses any substantial hazards to people, or to animal or plant populations. Furthermore, the City Fire Department would continue to provide emergency response services. As mentioned above, this alternative would not interfere with

emergency response plans or emergency evacuation plans relating to hazardous materials because each of the future projects within the Transit Zoning Code (SD 84A and SD 84B) would be required to go through plan checks with the fire department in addition to further environmental review of fire and emergency services. The types of hazardous materials anticipated are expected to be limited to regulated types and quantities. For these reasons, Alternative 2 would result in a ***less-than-significant*** impact related to the upset and accidental release of hazardous materials into the environment, similar to the proposed project. It should also be noted that under this alternative the potential for residential structures to be located near the I-5 Freeway would decrease, and there would be a corresponding decrease in the potential health risk due to the decrease in potential diesel exhaust emission attributable to I-5.

Similar to the proposed project, the future developments under Alternative 2 could handle and/or store potentially hazardous materials within the Transit Zoning Code (SD 84A and SD 84B); however, the types of hazardous materials anticipated are limited to regulated types and quantities. Compliance with all applicable local, State, and federal laws, and regulations associated with hazards and hazardous materials would ensure that development under this alternative would result in a ***less-than-significant*** environmental impact related to the emission or handling of hazardous materials within the vicinity of schools, similar to the proposed project.

Hydrology and Water Quality

Implementation of Alternative 2 would not result in significant impacts to hydrology or water quality. Grading and other earth moving activities during construction of individual projects within the project area could lead to an increase in suspended solids from surface flows during storm events, which could also impact surface water quality during storm events; however, any proposed development within the Transit Zoning Code (SD 84A and SD 84B) under this alternative would have to satisfy all applicable requirements of the NPDES Program and the Santa Ana Municipal Code, including the preparation of a SWPPP, similar to the proposed project. Compliance with these requirements would ensure that all construction related impacts to water quality and waste discharge requirements would be ***less than significant***.

During operational activities, pollutants may also be washed from the streets during non-storm events and this effect has the potential to degrade water quality and may result in significant impacts; however, development projects have a responsibility under NPDES to ensure pollutant loads from the projects do not exceed total maximum daily loads for downstream receiving waters. Under this alternative, development projects within the Transit Zoning Code (SD 84A and SD 84B) area would be required to submit and then implement a SUSMP containing design features BMPs appropriate and applicable to the individual projects. Potential water quality impacts would be ***less than significant*** with the preparation of required SUSMPs and implementation of the applicable BMPs, similar to the proposed project.

Groundwater use as a result of implementation of this alternative would be in accordance to existing plans and projections and would not substantially deplete groundwater supplies. In addition, the project area is currently not used for groundwater recharge activities and the site is developed with primarily impervious surfaces. Under existing conditions, there is little, if any, potential for natural groundwater

recharge to occur, and there is no facilitated groundwater recharge. Under this alternative, impervious surface characteristics would not be greatly altered, and no facilitated groundwater recharge facilities are planned. Existing areas of pervious surfaces that are not being modified would remain and potential recharge would not be changed. Improvement of existing impervious areas to more pervious conditions would not greatly alter surface hydrology and would not significantly alter infiltration or groundwater recharge. Consequently, development under this alternative would result in *less-than-significant* impact to groundwater supplies or recharge, similar to the proposed project.

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

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

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

Land Use

Existing land uses within the project area are primarily characterized as industrial, residential, and commercial with pockets of high-density residential uses in the northwestern and northeastern portions of the downtown area. Development under this alternative would include residential and commercial uses but at lower intensities than the proposed project. Amendments to the General Plan and Zoning Code would be undertaken to ensure conformity with the development proposed under this alternative. Similar to the proposed project, the intention of this alternative is to provide a mixed-use community,

which would enhance the efficiency and daily activity within the project area. Overall changes to the land use character would be similar to that described for the proposed project, but would result in 25 percent lower densities per land use. On the whole, impacts would be ***less than significant*** under this alternative, and similar to the proposed project.

Noise

Under Alternative 2, overall land use intensities/densities are reduced by 25 percent. Consequently, the noise impacts to residential land uses along major thoroughfares would be less than the proposed project, and would remain ***less than significant***.

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

Construction-related vibration and noise from the operation of the rail lines existing in the easterly side of the project area adjacent to the SARTC would be similar under this alternative to those of the proposed project. Although building intensities would be reduced, this would have little effect on the use of construction equipment such as pile drivers. In addition, lowering of project intensity has no effect on the noise generated by the use of the railroad tracks. The same mitigation measures would be implanted in this alternative as with the project. These would reduce the impacts. However, even after the incorporation of mitigation, impacts remain ***significant and unavoidable***.

Population and Housing

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

Full buildout of Alternative 2 would result in lesser impacts to population and housing as compared to the proposed project. The reduction in residential units (1,019) would also reduce the anticipated direct population growth by approximately 3,057 residents for a total project increase of 9,168 residents under this alternative. Because the projected increase of the anticipated residents in the City resulting from the proposed project is within, or under the limit of, the total population increase projected for the City between 2010 and 2035, and because this alternative would result in fewer new residents, the forecasted population growth in the City is not considered substantial relative to the surrounding areas. Therefore, this impact would be slightly less in magnitude when compared to the proposed project. Therefore, the anticipated increase, as a result of future development in the project area, would likely remain ***less than significant***, although less than the proposed project.

Public Services

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

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

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

Approximately 1,620 fewer residential units would be developed under this alternative, which in turn, would result in slightly fewer students when compared to the proposed project. The Santa Ana Unified School District currently collects developer fees for mitigation of school impacts. Government Code Section 53080, payment of development fees is considered full mitigation for significant school impacts. Therefore, the impact on schools from this alternative would be *less than significant*, similar to the proposed project, although slightly less.

As approximately 3,057 fewer residential units would be developed under this alternative, the impact to library services would be less than the proposed project. Although an increase in 9,168 residents would increase demand on library services, the tax base afforded by the additional development within the Transit Zoning Code (SD 84A and SD 84B) area would contribute to the City's general fund, which is distributed to various City services, including libraries. Therefore, any necessary improvements/modifications to the existing Santa Ana library system would be implemented using the general fund and determined on an as-needed annual basis by the City. As such, impacts would remain *less than significant*, similar to the proposed project.

Implementation of Alternative 2 would result in a lesser potential demand for additional recreational facilities in the project area; however, it could result in the increased use of parks and recreational facilities. Payment of developer fees would ensure that adequate parkland is provided for all City residents per the City's Municipal Code. As such, impacts would be *less than significant*, similar to the proposed project, although the anticipated level of parkland required for implementation of this alternative would be less than the proposed project.

Transportation

As development under this alternative would involve an intensification of uses, traffic volumes along local street segments are anticipated to increase. However, with the reduced overall densities, traffic will be lesser than with the project. All of the study area intersections that were found to have significant impacts as a result of the project will still have a significant impact as a result of this alternative, except for one intersection; the intersection of Mortimer St and Santa Ana Blvd showed an improvement to LOS D from LOS E, thereby not requiring installation of a signal or other improvement. The impacts to all other intersections would still require mitigation as described in Section 4.11 and remain *less than significant*. Impact 4.11-19 would remain *significant and unavoidable* because while the impacts to Grand Avenue at I-5 NB Ramps can be mitigated, it is beyond the jurisdiction of the City to make the necessary improvements. As buildout of both the proposed project and this alternative would both be subject to City code in regards to parking, impacts to parking would be similar to the proposed project and *less than significant*. Impacts to emergency access would comply with existing policies contained in the General Plan and Municipal Code, and would be *less than significant*, similar to the proposed project.

Utilities

Alternative 2, at buildout, would increase the population of the City resulting in increased demands for utilities. As the population increase would be less under Alternative 2 than under the proposed project, the demand for utilities would be correspondingly less. Although the demand would only be slightly less as compared to the proposed project, impacts to utilities would remain at *less than significant*.

5.3.4 Alternative 3—Low-Rise Project

■ Description

This alternative is a low- to mid-rise version of the Transit Zoning Code (SD 84A and SD 84B). Under this alternative, the Downtown and Transit Village Districts would be redeveloped according to the standards of the First Street Corridor District. The remaining districts of the Transit Zoning Code (SD 84A and SD 84B) area would be developed consistent with the proposed project under this alternative. Specific development characteristics that would be allowed under this alternative relative to the proposed Transit Zoning Code (SD 84A and SD 84B) are specified in Table 5-2 (Alternative 3 and Proposed Transit Zoning Code [SD 84A and SD 84B] Characteristics).

Table 5-2 Alternative 3 and Proposed Transit Zoning Code (SD 84A and SD 84B) Characteristics

<i>Land Use Type</i>	<i>Alternative 3</i>	<i>Transit Zoning Code (SD 84A and SD 84B)</i>	<i>Difference</i>
Residential (units)	2,026	4,075	(2,049)
Retail (sf)	351,000	387,000	(36,000)
Industrial (sf)	(990,000)	(990,000)	0
Commercial (sf)	(124,000)	(124,000)	0
Civic (sf)	(21,000)	(21,000)	0
Green (sf)	680,000	680,000	0
Parking	(1,534,000)	(1,772,000)	(238,000)

SOURCE: PBS&J 2010

■ Impacts

Aesthetics

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

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

Similar to the proposed project, this alternative could result in obstruction of views of a scenic vista and/or focal views of places of public interest (e.g., historic resources, public art, or landmarks). Views of mountain ranges from within the downtown area are generally taken from viewsheds looking down street corridors, between existing buildings. Similar to the proposed project, this alternative would not develop new structures within street rights-of-way so existing viewsheds would not be blocked and views of the mountains from within the Transit Zoning Code (SD 84A and SD 84B) area would be preserved. Development under this alternative would be less intense and structures would be of lower height compared to the proposed project, the impacts upon scenic vistas of mountains from this alternative would be less than the proposed project and are considered *less than significant*.

Development under this alternative would result in changes to the visual character and quality of the downtown area. Similar to the proposed project, Alternative 3 would temporarily adversely alter visual conditions associated with construction activities and equipment. As such, construction-related visual

impacts associated with this alternative are considered *less than significant*, and would be equal to the proposed project.

This alternative would result in permanent impacts to the visual character or quality of the downtown area. The development proposed under this alternative would redistribute land uses, as compared to the proposed project, but would apply the same design guidelines and new landscaping as the proposed project. The reduction in allowable building heights under this alternative would somewhat lessen the potential change to visual character of the area. Therefore, this impact would be considered *less than significant*.

Light and glare would also be expected to increase with implementation of this alternative, similar to the proposed project. This alternative includes the same mitigation measures applicable to the proposed project to ensure that future project design features would be developed to ensure that lighting and glare impacts from specific development projects would remain at less than significant levels. In consideration of already-substantial existing ambient lighting and glare in the Transit Zoning Code (SD 84A and SD 84B) area, adverse environmental impacts from increased light and glare associated with this alternative are anticipated to be less than significant. The provision of appropriate mitigation measures and specific project design features would ensure that lighting and glare impacts from specific development projects under this alternative would remain at *less-than-significant* levels.

Similar to the proposed project, new sources of increased shade would likely result from new development under this alternative. However, under this alternative, the potential height of structures developed as part of this alternative would be limited to four stories in height, which is similar to the structures currently located in the project area. As a result, the level of shadows that would exist in the project area upon implementation of this alternative would not be expected to substantially increase the level of shadows cast within the Transit Zoning Code (SD 84A and SD 84B) area. As a result, impacts are anticipated to be reduced to *less than significant* levels, and less than the proposed project's significant and unavoidable impacts.

Air Quality

Implementation of this alternative would provide new sources of regional air emissions. However, it was determined that the proposed project would not conflict with, and impair, implementation of the Air Quality Management Plan (AQMP). Implementation of Alternative 3 would result in less residential development than the proposed project. Because future population levels would be consistent with SCAG projections, this alternative would also be considered consistent with the 2007 AQMP. Similar to the proposed project, this impact would be considered *less than significant*.

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

Due to the overall reduction in residential uses and development intensity under this alternative, total air emissions would likely be less than the proposed project. Nonetheless, operational impacts of this alternative, as well as the contribution of the alternative to an existing air quality violation are anticipated to remain **significant and unavoidable** due to the increase in development within the Transit Zoning Code (SD 84A and SD 84B) area.

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

Biological Resources

As described in the Environmental Setting, the majority of the Transit Zoning Code (SD 84A and SD 84B) area has been developed, paved, or landscaped and supports largely non-native plant species. Suitable habitat for sensitive mammal, reptile, amphibian, or fish species does not exist within the Transit Zoning Code (SD 84A and SD 84B) or adjacent areas, and there are no wildlife migration corridors. In addition, no threatened, endangered, or sensitive species have been reported to occur within the Transit Zoning Code (SD 84A and SD 84B) area. Impacts would be **less than significant**, similar to the proposed project.

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

Cultural Resources

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

Because development could still occur on the same parcels within the Transit Zoning Code (SD 84A and SD 84B) area, regardless of its intensity, the potential demolition of historic structures could still occur. Even though the mitigation measures associated with protection of historic resources for the proposed project would apply, it is anticipated that impacts under this alternative would be **significant and unavoidable**, similar to the proposed project.

Geology and Soils

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

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

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

Global Climate Change

Under this alternative, development intensity would be lesser, thereby potentially fewer automobile trips might occur. In addition, the burning of combustible materials for heat, need for electricity would be expected to be reduced. However, development under this alternative would still likely be similar to the proposed project and remain ***significant and unavoidable***.

Hazards

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

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

Similar to the proposed project, under this alternative, the City would be required to create an updated emergency response plan for the project area to ensure adequate emergency access and evacuation. Site plans for future development within the Transit Zoning Code (SD 84A and SD 84B) area would be reviewed by the City to ensure adequate police, ambulance, and fire personnel access to the proposed project area. In addition, future developments would likely require further environmental analysis under

CEQA which would include impact analysis of fire, police, and ambulance access. Traffic impacts within the Transit Zoning Code (SD 84A and SD 84B) area which could impact response plans and evacuation plans would be required to be mitigated to less than significant levels. After implementation of identified mitigation measures for the proposed project, development initiated under this alternative would not interfere with any emergency response or evacuation plans. This impact is considered ***less than significant***, similar to the proposed project.

Although projects within the Transit Zoning Code (SD 84A and SD 84B) area could involve the use of some hazardous materials, applicable laws regarding upset and accident preparation and response would continue to be implemented as required for the proposed project. Existing regulations would be expected to minimize the potential for exposure to adverse health or safety effects. Therefore, development under this alternative would not involve the use of materials in a manner that poses any substantial hazards to people, or to animal or plant populations. Furthermore, the Santa Ana Fire Department would continue to provide emergency response services. As mentioned above, this alternative would not interfere with emergency response plans or emergency evacuation plans relating to hazardous materials because each of the future projects within the Transit Zoning Code (SD 84A and SD 84B) area would be required to go through plan checks with the fire department in addition to further environmental review of fire and emergency services. The types of hazardous materials anticipated are expected to be limited to regulated types and quantities. For these reasons, Alternative 3 would result in a ***less-than-significant*** impact related to the upset and accidental release of hazardous materials into the environment, similar to the proposed project.

Hydrology and Water Quality

Implementation of Alternative 3 would not result in significant impacts to hydrology or water quality. Less overall development could occur, thereby slightly reducing hydrology and water quality impacts. Grading and other earth moving activities during construction of individual projects within the project area could lead to an increase in suspended solids from surface flows during storm events, which could also impact surface water quality during storm events; however, any proposed development within the Transit Zoning Code (SD 84A and SD 84B) area under this alternative would have to satisfy all applicable requirements of the NPDES Program and the Santa Ana Municipal Code, including the preparation of a SWPPP, similar to the proposed project. Compliance with these requirements would ensure that all construction related impacts to water quality and waste discharge requirements would be ***less than significant***.

During operational activities, pollutants may also be washed from the streets during non-storm events and this effect has the potential to degrade water quality and may result in significant impacts; however, development projects have a responsibility under the NPDES, to ensure pollutant loads from the projects do not exceed total maximum daily loads for downstream receiving waters. Under this alternative, development projects within the Transit Zoning Code (SD 84A and SD 84B) area would be required to submit and then implement a SUSMP containing design features BMPs appropriate and applicable to the individual projects. Potential water quality impacts would be ***less than significant*** with the preparation of required SUSMPs and implementation of the applicable BMPs, similar to the proposed project.

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

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

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

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

Land Use

Existing land uses within the project area are primarily characterized as industrial, residential, and commercial with pockets of high-density residential uses in the northwestern and northeastern portions

of the downtown area. Development under this alternative would include less residential development compared to the proposed project and lower overall allowable building heights. Minor inconsistencies would occur between Alternative 3 and the existing applicable land use plans governing development of the project area, similar to that identified for the proposed project. Amendments to the General Plan and Zoning Code would be undertaken to ensure conformity with the development proposed under this alternative. Similar to the proposed project, the intention of this alternative is to provide mixed-use residential and mixed-use commercial communities, which would enhance the efficiency and daily activity within the project area, but would occur in a different ratio than that under the proposed project. In addition, the neighborhoods/districts outlined under the Transit Zoning Code (SD 84A and SD 84B) loosely conform to the types of uses and neighborhoods identified under this alternative. Overall changes to the land use character would be similar to that described for the proposed project, but would result in a greater emphasis on residential and commercial. On the whole, impacts would be *less than significant* under this alternative, and similar to the proposed project.

Noise

Under Alternative 3, future development would involve a less intense development within the Transit Zoning Code (SD 84A and SD 84B) area. As a result, impacts would be less than the proposed project. Since the proposed project determined a less than significant impact with respect to operational noise, this alternative would not be anticipated to expose sensitive receptors in the project area to excessive noise levels, and impacts would remain *less than significant*.

Similar to the proposed project, construction activities under this alternative would be subject to the City's Municipal Code standards, and construction noise would be controlled. This impact would be *less than significant*, similar to the proposed project. Nonetheless, the potential for sensitive receptors to be subject to excessive vibration during construction would remain, similar to the proposed project, and would be considered *significant and unavoidable*. Impacts related to noise from the AT & SF railroad would still occur under this alternative since it does not affect the current use of trains. This impact would be considered *significant and unavoidable*.

Population and Housing

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

Full buildout of Alternative 3 would result in lesser impacts to population and housing as compared to the proposed project. The residential development potential of this alternative would include approximately 2,049 fewer residential units than the proposed project. The decrease in residential uses would also result in a decrease in the anticipated population increase by approximately 6,147 residents, for a total increase of approximately 6,078 persons.

Because the projected increase of the anticipated residents in the City resulting from the proposed project is within, or under the limit of, the total population increase projected for the City between 2010 and 2035, and because this alternative would result in fewer new residents, the forecasted population growth in the City is not considered substantial relative to the surrounding areas. Therefore, this impact would be slightly less in magnitude when compared to the proposed project. Therefore, the anticipated increase, as a result of future development in the project area, would likely remain *less than significant*, although less than the proposed project.

The beneficial impact of providing a net increase in residential housing units would be realized under Alternative 3, but to a lesser degree than the proposed project. Due to the fact that Alternative 3 would provide 2,049 fewer residential units than the proposed project, this alternative would not perform as well as the proposed project in addressing a potential future housing shortage issue in the City.

Public Services

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

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

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

Approximately 2,049 fewer residential units would be developed under this alternative, which in turn, would result in slightly fewer students when compared to the proposed project. The Santa Ana Unified School District currently collects developer fees for mitigation of school impacts. Government Code Section 53080, payment of development fees is considered full mitigation for significant school impacts. Therefore, the impact on schools from this alternative would be *less than significant*, similar to the proposed project, although slightly less.

As approximately 2,049 fewer residential units would be developed under this alternative, the impact to library services would be less than the proposed project. Although an increase in 6,078 residents would increase demand on library services, the tax base afforded by the additional development within the

Transit Zoning Code (SD 84A and SD 84B) area would contribute to the City's general fund, which is distributed to various City services, including libraries. Therefore, any necessary improvements/modifications to the existing Santa Ana library system would be implemented using the general fund and determined on an as-needed annual basis by the City. However, an increase in 6,078 residents would increase demand on library services and would be considered potentially significant. As such, impacts would remain *less than significant*, similar to the proposed project.

Implementation of Alternative 3 would result in a lesser potential demand for additional recreational facilities in the project area; however, could result in the increased use of parks and recreational facilities. Payment of developer fees would ensure that adequate parkland is provided for all City residents per the City's Municipal Code. As such, impacts would be *less than significant*, similar to the proposed project, although the anticipated level of parkland required for implementation of this alternative would be less than the proposed project.

Transportation

As development under this alternative would involve a lesser intensity of uses, traffic volumes along local street segments is anticipated to decrease. However, impacts are not expected to be eliminated. The impacts to all intersections would still require mitigation as described in Section 4.11 and remain *less than significant*. Impact 4.11-19 would remain *significant and unavoidable* because while the impacts to Grand Avenue at I-5 NB Ramps can be mitigated, it is beyond the jurisdiction of the City to make the necessary improvements. As buildout of both the proposed project and this alternative would both be subject to City code in regards to parking, impacts to parking would be similar to the proposed project and *less than significant*. Impacts to emergency access would comply with existing policies contained in the General Plan and Municipal Code, and would be *less than significant*, similar to the proposed project.

Utilities

Alternative 3, at buildout, would directly increase the population of the City by approximately 6,078 residents, resulting in increased demands for utilities. As the population increase would be greater than under the proposed project, demands on utilities would be correspondingly greater; however, impacts would be *less than significant*.

5.3.5 Alternative 4—Rehabilitate in Place/Acquire No Additional Properties

■ Description

This alternative would eliminate the demolition of the structures currently existing on the Agency-owned properties identified in Figure 5-1 (Demolitions) and would instead require that those properties be retained and rehabilitated in their current locations. In addition, this alternative would eliminate any new potential acquisitions as identified in Figure 5-2 (Potential New Santa Ana Redevelopment Agency Acquisitions). This Alternative would result in 88 rental units and 25 for sale units. This alternative

affects only the Developer Project component of the overall proposed project (analysis of the Transit Zoning Code). All remaining aspects of the project description remain unchanged.

■ Impacts

Aesthetics

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

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

Similar to the proposed project, this alternative could result in obstruction of views of a scenic vista and/or focal views of places of public interest (e.g., historic resources, public art, or landmarks). Views of mountain ranges from within the project area are generally taken from viewsheds looking down street corridors, between existing buildings. Similar to the proposed project, this alternative would not develop new structures within street rights-of-way so existing viewsheds would not be blocked and views of the mountains from within the Transit Zoning Code (SD 84A and SD 84B) area would be preserved. The impacts upon scenic vistas of mountains from this alternative would be the same as the proposed project and are considered ***less than significant***.

Development under this alternative would result in changes to the visual character and quality of the project area. Similar to the proposed project, Alternative 4 would temporarily adversely alter visual conditions associated with construction activities and equipment. As such, construction-related visual impacts associated with this alternative are considered ***less than significant***, and would be equal to the proposed project.

This alternative would result in permanent impacts to the visual character or quality of the project area. The development proposed under this alternative would be similar to the proposed project and would apply the same design guidelines and new landscaping as the proposed project. Therefore, this impact would be considered ***less than significant***.

Light and glare would also be expected to increase with implementation of this alternative, similar to the proposed project. This alternative includes the same mitigation measures applicable to the proposed project to ensure that future project design features would be developed to ensure that lighting and glare impacts from specific development projects would remain at less than significant levels. In consideration of already-substantial existing ambient lighting and glare in the Transit Zoning Code (SD 84A and

SD 84B) area, adverse environmental impacts from increased light and glare associated with this alternative are anticipated to be less than significant. The provision of appropriate mitigation measures and specific project design features would ensure that lighting and glare impacts from specific development projects under this alternative would remain at *less-than-significant* levels.

This alternative would limit the number of new structures constructed on the Agency-owned properties and, as such, would retain the existing structures, none of which exceed four stories in height. This would reduce the short-term likelihood of the construction of new structures in this portion of the Transit Zoning Code area that could contribute to increased shade and shadow impacts. However, the reduction in overall building height for this area would not significantly reduce the potential for shade and shadow impacts due to building heights allowed in the Downtown and Transit Village subzones of the Transit Zoning Code. As a result, impacts remain *significant and unavoidable* as they were under the proposed project.

Air Quality

Implementation of this alternative would provide new sources of regional air emissions. However, it was determined that the proposed project would not conflict with, and impair, implementation of the Air Quality Management Plan (AQMP). Implementation of Alternative 4 would result in slightly less residential development than the proposed project. Because future population levels would be consistent with SCAG projections, this alternative would also be considered consistent with the 2007 AQMP. Similar to the proposed project, this impact would be considered *less than significant*.

The total amount of emissions generated, including criteria pollutants, under this alternative could result in a similar, but slightly lesser, amount of construction to that of the proposed project since demolition of existing structures will not occur on Agency-owned properties. The total emissions generated by construction of individual projects, which may have overlapping schedules, would be expected to remain in exceedance of SCAQMD thresholds and violate and/or contribute to an air quality violation. As a result, construction impacts on air quality would remain *significant and unavoidable*, similar to the proposed project.

Operational impacts of this alternative, as well as the contribution of the alternative to an existing air quality violation are anticipated to remain *significant and unavoidable* due to the increase in development within the Transit Zoning Code (SD 84A and SD 84B) area.

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

Biological Resources

As described in the Environmental Setting, the majority of the Transit Zoning Code (SD 84A and SD 84B) area has been developed, paved, or landscaped and supports largely non-native plant species.

Suitable habitat for sensitive mammal, reptile, amphibian, or fish species does not exist within the Transit Zoning Code (SD 84A and SD 84B) or adjacent areas, and there are no wildlife migration corridors. In addition, no threatened, endangered, or sensitive species have been reported to occur within the Transit Zoning Code (SD 84A and SD 84B) area. Impacts would ***less than significant***, similar to the proposed project.

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

Cultural Resources

Development under this alternative would result in the preservation of all of the identified Agency-owned parcels where demolition was proposed and would rehabilitate these properties. Ground-disturbing activities could continue to occur in order to accommodate new development elsewhere throughout the project area. Consequently, the potential of encountering fossil-bearing soils and rock formations, destroying belowground paleontological resources, affecting archaeological sites and sites of cultural significance to Native Americans would still occur, similar to the proposed project. Given the lack of any documented buried cultural resources in the area, the probability of uncovering these resources is considered low. Mitigation measures identified for the proposed project would apply and would reduce impacts to ***less than significant***.

Although this alternative will reduce impacts to potentially historic properties on the Agency-owned parcels defined in the project description, development could still occur on other parcels within the Transit Zoning Code (SD 84A and SD 84B) area, the potential demolition of historic structures could still occur. Even though the mitigation measures associated with protection of historic resources for the proposed project would apply, it is anticipated that impacts under this alternative would be ***significant and unavoidable***, although lesser than the impacts of the proposed project.

Geology and Soils

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

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

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

Global Climate Change

Under this alternative, development intensity would be the substantially similar to that of the proposed project. Thus, the burning of combustible materials for heat, need for electricity would be expected to be the same and remain ***significant and unavoidable***.

Hazards

Impacts related to Hazards and Hazardous Materials would be largely similar to the proposed project. Similar to the proposed project, there is potential for encountering soil contamination during construction, which could create a significant hazard to the public or the environment. Mitigation measures identified for the proposed project would reduce this impact to a ***less-than-significant*** level.

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

Similar to the proposed project, under this alternative, the City would be required to create an updated emergency response plan for the project area to ensure adequate emergency access and evacuation. Site plans for future development within the Transit Zoning Code (SD 84A and SD 84B) area would be reviewed by the City to ensure adequate police, ambulance, and fire personnel access to the proposed project area. In addition, future developments would likely require further environmental analysis under CEQA which would include impact analysis of fire, police, and ambulance access. Traffic impacts within the Transit Zoning Code (SD 84A and SD 84B) area which could impact response plans and evacuation plans would be required to be mitigated to less than significant levels. After implementation of identified mitigation measures for the proposed project, development initiated under this alternative would not interfere with any emergency response or evacuation plans. This impact is considered ***less than significant***, similar to the proposed project.

Although projects within the Transit Zoning Code (SD 84A and SD 84B) area could involve the use of some hazardous materials, applicable laws regarding upset and accident preparation and response would continue to be implemented as required for the proposed project. Existing regulations would be expected to minimize the potential for exposure to adverse health or safety effects. Therefore, development under this alternative would not involve the use of materials in a manner that poses any substantial hazards to people, or to animal or plant populations. Furthermore, the Santa Ana Fire Department would continue to provide emergency response services. As mentioned above, this alternative would not interfere with emergency response plans or emergency evacuation plans relating to hazardous materials because each of

the future projects within the Transit Zoning Code (SD 84A and SD 84B) area would be required to go through plan checks with the fire department in addition to further environmental review of fire and emergency services. The types of hazardous materials anticipated are expected to be limited to regulated types and quantities. For these reasons, Alternative 4 would result in a ***less-than-significant*** impact related to the upset and accidental release of hazardous materials into the environment, similar to the proposed project.

Hydrology and Water Quality

Implementation of Alternative 4 would not result in significant impacts to hydrology or water quality. Grading and other earth moving activities during construction of individual projects within the project area could lead to an increase in suspended solids from surface flows during storm events, which could also impact surface water quality during storm events; however, any proposed development within the Transit Zoning Code (SD 84A and SD 84B) area under this alternative would have to satisfy all applicable requirements of the NPDES Program and the Santa Ana Municipal Code, including the preparation of a SWPPP, similar to the proposed project. Compliance with these requirements would ensure that all construction related impacts to water quality and waste discharge requirements would be ***less than significant***.

During operational activities, pollutants may also be washed from the streets during non-storm events and this effect has the potential to degrade water quality and may result in significant impacts; however, development projects have a responsibility under the NPDES, to ensure pollutant loads from the projects do not exceed total maximum daily loads for downstream receiving waters. Under this alternative, development projects within the Transit Zoning Code (SD 84A and SD 84B) area would be required to submit and then implement a SUSMP containing design features BMPs appropriate and applicable to the individual projects. Potential water quality impacts would be ***less than significant*** with the preparation of required SUSMPs and implementation of the applicable BMPs, similar to the proposed project.

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

The project area is developed and served by existing storm water collection and conveyance systems, and does not contain a stream or river. Construction activities associated with development would not require any substantial changes to the existing drainage patterns of the area. Furthermore, individual

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

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

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

Land Use

Existing land uses within the project area are primarily characterized as industrial, residential, and commercial with pockets of high-density residential uses in the northwestern and northeastern portions of the downtown area. Development under this alternative would include 107 fewer residential units compared to the proposed project. Minor inconsistencies would occur between Alternative 4 and the existing applicable land use plans governing development of the project area, similar to that identified for the proposed project. Amendments to the General Plan and Zoning Code would be undertaken to ensure conformity with the development proposed under this alternative. Similar to the proposed project, the intention of this alternative is to provide mixed-use residential and mixed-use commercial communities, which would enhance the efficiency and daily activity within the project area. Overall changes to the land use character would be similar to that described for the proposed project. On the whole, impacts would be *less than significant* under this alternative, and similar to the proposed project.

Noise

Under Alternative 4, future development would involve similar intensity as the Transit Zoning Code (SD 84A and SD 84B) area. As a result, impacts would be similar to the proposed project. Since the proposed project determined a less than significant impact with respect to operational noise, this

alternative would not be anticipated to expose sensitive receptors in the project area to excessive noise levels, and impacts would remain *less than significant*.

Similar to the proposed project, construction activities under this alternative would be subject to the City's Municipal Code standards, and construction noise would be controlled. This impact would be *less than significant*, similar to the proposed project. Nonetheless, the potential for sensitive receptors to be subject to excessive vibration during construction would remain, similar to the proposed project, and would be considered *significant and unavoidable*. Impacts related to noise from the AT & SF railroad would still occur under this alternative since it does not affect the current use of trains. This impact would be considered *significant and unavoidable*.

Population and Housing

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

Full buildout of Alternative 4 would result in lesser impacts to population and housing as compared to the proposed project. The residential development potential of this alternative would include approximately 107 fewer residential units than the proposed project. The decrease in residential uses would also result in a decrease in the anticipated population increase by approximately by 339 persons.

Because the projected increase of the anticipated residents in the City resulting from the proposed project is within, or under the limit of, the total population increase projected for the City between 2010 and 2035, and because this alternative would result in fewer new residents, the forecasted population growth in the City is not considered substantial relative to the surrounding areas. Therefore, this impact would be slightly less in magnitude when compared to the proposed project. Therefore, the anticipated increase, as a result of future development in the project area, would likely remain *less than significant*, although less than the proposed project.

The beneficial impact of providing a net increase in residential housing units would be realized under Alternative 4, but to a lesser degree than the proposed project. Due to the fact that Alternative 4 would provide 107 fewer residential units than the proposed project, this alternative would not perform as well as the proposed project in addressing a potential future housing shortage issue in the City.

Public Services

As the population increase would be slightly less under this alternative (339 fewer) compared to the proposed project, impacts to public services would also be less than the proposed project, as discussed below.

The same types of development would be permitted throughout the project area. Therefore, the anticipated number of calls is expected to be similar to the proposed project, and would not be above the

recommended workload for a rescue ambulance. Similarly, all new buildings developed under this alternative would be constructed in accordance with the City's Building Code and would be required to have adequate fire code requirements. Implementation of this alternative would still not result in a substantial reduction in the firefighter per resident ratio within the City, similar to the proposed project. As such, impacts would also be *less than significant*.

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

Approximately 107 fewer residential units would be developed under this alternative, which in turn, would result in slightly fewer students when compared to the proposed project. The Santa Ana Unified School District currently collects developer fees for mitigation of school impacts. Government Code Section 53080, payment of development fees is considered full mitigation for significant school impacts. Therefore, the impact on schools from this alternative would be *less than significant*, similar to the proposed project, although slightly less.

As approximately 107 fewer residential units would be developed under this alternative, the impact to library services would be less than the proposed project. The decrease of 339 residents from what would be expected as a result of the project would decrease demand on library services. The tax base afforded by the potential overall additional development within the Transit Zoning Code (SD 84A and SD 84B) area would contribute to the City's general fund, which is distributed to various City services, including libraries. Therefore, any necessary improvements/modifications to the existing Santa Ana library system would be implemented using the general fund and determined on an as-needed annual basis by the City. However, the overall increase in the number of residents would increase demand on library services and would be considered potentially significant. As such, impacts would remain *less than significant*, similar to the proposed project.

Implementation of Alternative 4 would result in a lesser potential demand for additional recreational facilities in the project area; however, could result in the increased use of parks and recreational facilities. Payment of developer fees would ensure that adequate parkland is provided for all City residents per the City's Municipal Code. As such, impacts would be *less than significant*, similar to the proposed project, although the anticipated level of parkland required for implementation of this alternative would be less than the proposed project.

Transportation

Development under this alternative would include substantially similar types and intensity of uses, traffic volumes along local street segments is anticipated to remain the same. The impacts to all intersections

would still require mitigation as described in Section 4.11 and remain *less than significant*. Impact 4.11-19 would remain *significant and unavoidable* because while the impacts to Grand Avenue at I-5 NB Ramps can be mitigated, it is beyond the jurisdiction of the City to make the necessary improvements. As buildout of both the proposed project and this alternative would both be subject to City code in regards to parking, impacts to parking would be similar to the proposed project and *less than significant*. Impacts to emergency access would comply with existing policies contained in the General Plan and Municipal Code, and would be *less than significant*, similar to the proposed project.

Utilities

Alternative 4, at buildout, would directly increase the population of the City by approximately 11,757 residents, resulting in increased demands for utilities. The population increase would be substantially similar to that of the proposed project, demands on utilities would be correspondingly similar; however, impacts would be *less than significant*.

5.3.6 Alternative 5— Relocate and Rehabilitate on Agency-Owned Infill Sites

■ Description

This alternative would reduce the demolition of properties owned by the City of Santa Ana Redevelopment Agency. Under this alternative the properties identified in Figure 3-5 (Santa Ana Redevelopment Agency Parcels) and Figure 5-2 (Potential New Santa Ana Redevelopment Agency Acquisitions), which includes the properties that are proposed for demolition shown in Figure 5-1 (Demolitions), would be rehabilitated in place, moved to vacant lots and rehabilitated, or demolished. Further, the property located at 611 N. Minter Street would be demolished. Following a comprehensive historic survey of the properties, the City's Historic Resources Commission would evaluate all of the structures to determine their eligibility for listing on the City's Register of Historical Properties and would make recommendations regarding the selection of houses to be moved and onto which sites they should be moved. This Alternative would result in a total of 138 rental units and 22 for sale units. This alternative affects only the Developer Project component of the overall proposed project (analysis of the Transit Zoning Code). All remaining aspects of the project description remain unchanged.

■ Impacts

Aesthetics

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

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

Similar to the proposed project, this alternative could result in obstruction of views of a scenic vista and/or focal views of places of public interest (e.g., historic resources, public art, or landmarks). Views of mountain ranges from within the project area are generally taken from viewsheds looking down street corridors, between existing buildings. Similar to the proposed project, this alternative would not develop new structures within street rights-of-way so existing viewsheds would not be blocked and views of the mountains from within the Transit Zoning Code (SD 84A and SD 84B) area would be preserved. The impacts upon scenic vistas of mountains from this alternative would be the same as the proposed project and are considered *less than significant*.

Development under this alternative would result in changes to the visual character and quality of the project area. Similar to the proposed project, Alternative 5 would temporarily adversely alter visual conditions associated with construction activities and equipment. As such, construction-related visual impacts associated with this alternative are considered *less than significant*, and would be equal to the proposed project.

This alternative would result in permanent impacts to the visual character or quality of the project area. The development proposed under this alternative would be similar to the proposed project and would apply the same design guidelines and new landscaping as the proposed project. Therefore, this impact would be considered *less than significant*.

Light and glare would also be expected to increase with implementation of this alternative, similar to the proposed project. This alternative includes the same mitigation measures applicable to the proposed project to ensure that future project design features would be developed to ensure that lighting and glare impacts from specific development projects would remain at less than significant levels. In consideration of already-substantial existing ambient lighting and glare in the Transit Zoning Code (SD 84A and SD 84B) area, adverse environmental impacts from increased light and glare associated with this alternative are anticipated to be less than significant. The provision of appropriate mitigation measures and specific project design features would ensure that lighting and glare impacts from specific development projects under this alternative would remain at *less-than-significant* levels.

This alternative would limit the number of new structures constructed on the Agency-owned properties and, as such, would retain the existing structures, none of which exceed four stories in height. This would reduce the short-term likelihood of the construction of new structures in this portion of the Transit Zoning Code area that could contribute to increased shade and shadow impacts. However, the reduction in overall building height for this area would not significantly reduce the potential for shade and shadow impacts due to building heights allowed in the Downtown and Transit Village subzones of the Transit Zoning Code. As a result, impacts remain *significant and unavoidable* as they were under the proposed project.

Air Quality

Implementation of this alternative would provide new sources of regional air emissions. However, it was determined that the proposed project would not conflict with, and impair, implementation of the Air Quality Management Plan (AQMP). Implementation of Alternative 5 would result in slightly less residential development than the proposed project. Because future population levels would be consistent with SCAG projections, this alternative would also be considered consistent with the 2007 AQMP. Similar to the proposed project, this impact would be considered *less than significant*.

The total amount of emissions generated, including criteria pollutants, under this alternative could result in a similar but slightly lesser amounts of construction to that of the proposed project since demolition will not occur on Agency-owned structures. The total emissions generated by construction of individual projects, which may have overlapping schedules would be expected to remain in exceedance of SCAQMD thresholds and violate and/or contribute to an air quality violation. As a result, construction impacts on air quality would remain *significant and unavoidable*, similar to the proposed project.

Operational impacts of this alternative, as well as the contribution of the alternative to an existing air quality violation are anticipated to remain *significant and unavoidable* due to the increase in development within the Transit Zoning Code (SD 84A and SD 84B) area.

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

Biological Resources

As described in the Environmental Setting, the majority of the Transit Zoning Code (SD 84A and SD 84B) area has been developed, paved, or landscaped and supports largely non-native plant species. Suitable habitat for sensitive mammal, reptile, amphibian, or fish species does not exist within the Transit Zoning Code (SD 84A and SD 84B) or adjacent areas, and there are no wildlife migration corridors. In addition, no threatened, endangered, or sensitive species have been reported to occur within the Transit Zoning Code (SD 84A and SD 84B) area. Impacts would *less than significant*, similar to the proposed project.

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

Cultural Resources

Development under this alternative would result in either the preservation of all of the identified Agency-owned parcels where demolition was proposed, the rehabilitation of these properties in place, the

relocation of structures to other Agency-owned infill parcels, or some combination thereof. The exception would be the structures at 611 N. Minter Avenue, which would be demolished under this Alternative. Ground-disturbing activities could continue to occur in order to accommodate new development elsewhere throughout the project area. Consequently, the potential of encountering fossil-bearing soils and rock formations, destroying belowground paleontological resources, affecting archaeological sites and sites of cultural significance to Native Americans would still occur, similar to the proposed project. Given the lack of any documented buried cultural resources in the area, the probability of uncovering these resources is considered low. Mitigation measures identified for the proposed project would apply and would reduce impacts to ***less than significant***.

Although this alternative will reduce impacts to potentially historic properties on the Agency-owned parcels defined in the project description, development could still occur on other parcels within the Transit Zoning Code (SD 84A and SD 84B) area, and the potential demolition of historic structures could still occur. Even though the mitigation measures associated with protection of historic resources for the proposed project would apply, it is anticipated that impacts under this alternative would be ***significant and unavoidable***, although lesser than the impacts of the proposed project.

Geology and Soils

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

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

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

Global Climate Change

Under this alternative, development intensity would be the substantially similar to that of the proposed project. Thus, the burning of combustible materials for heat, need for electricity would be expected to be the same and remain ***significant and unavoidable***.

Hazards

Impacts related to Hazards and Hazardous Materials would be largely similar to the proposed project. Similar to the proposed project, there is potential for encountering soil contamination during

construction, which could create a significant hazard to the public or the environment. Mitigation measures identified for the proposed project would reduce this impact to a *less-than-significant* level.

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

Similar to the proposed project, under this alternative, the City would be required to create an updated emergency response plan for the project area to ensure adequate emergency access and evacuation. Site plans for future development within the Transit Zoning Code (SD 84A and SD 84B) area would be reviewed by the City to ensure adequate police, ambulance, and fire personnel access to the proposed project area. In addition, future developments would likely require further environmental analysis under CEQA which would include impact analysis of fire, police, and ambulance access. Traffic impacts within the Transit Zoning Code (SD 84A and SD 84B) area which could impact response plans and evacuation plans would be required to be mitigated to less than significant levels. After implementation of identified mitigation measures for the proposed project, development initiated under this alternative would not interfere with any emergency response or evacuation plans. This impact is considered *less than significant*, similar to the proposed project.

Although projects within the Transit Zoning Code (SD 84A and SD 84B) area could involve the use of some hazardous materials, applicable laws regarding upset and accident preparation and response would continue to be implemented as required for the proposed project. Existing regulations would be expected to minimize the potential for exposure to adverse health or safety effects. Therefore, development under this alternative would not involve the use of materials in a manner that poses any substantial hazards to people, or to animal or plant populations. Furthermore, the Santa Ana Fire Department would continue to provide emergency response services. As mentioned above, this alternative would not interfere with emergency response plans or emergency evacuation plans relating to hazardous materials because each of the future projects within the Transit Zoning Code (SD 84A and SD 84B) area would be required to go through plan checks with the fire department in addition to further environmental review of fire and emergency services. The types of hazardous materials anticipated are expected to be limited to regulated types and quantities. For these reasons, Alternative 5 would result in a *less-than-significant* impact related to the upset and accidental release of hazardous materials into the environment, similar to the proposed project.

Hydrology and Water Quality

Implementation of Alternative 5 would not result in significant impacts to hydrology or water quality. Grading and other earth moving activities during construction of individual projects within the project area could lead to an increase in suspended solids from surface flows during storm events, which could also impact surface water quality during storm events; however, any proposed development within the

Transit Zoning Code (SD 84A and SD 84B) area under this alternative would have to satisfy all applicable requirements of the NPDES Program and the Santa Ana Municipal Code, including the preparation of a SWPPP, similar to the proposed project. Compliance with these requirements would ensure that all construction related impacts to water quality and waste discharge requirements would be ***less than significant***.

During operational activities, pollutants may also be washed from the streets during non-storm events and this effect has the potential to degrade water quality and may result in significant impacts; however, development projects have a responsibility under the NPDES, to ensure pollutant loads from the projects do not exceed total maximum daily loads for downstream receiving waters. Under this alternative, development projects within the Transit Zoning Code (SD 84A and SD 84B) area would be required to submit and then implement a SUSMP containing design features BMPs appropriate and applicable to the individual projects. Potential water quality impacts would be ***less than significant*** with the preparation of required SUSMPs and implementation of the applicable BMPs, similar to the proposed project.

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

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

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

Because slightly less construction would occur under this alternative, this impact would be slightly less than the proposed project.

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

Land Use

Existing land uses within the project area are primarily characterized as industrial, residential, and commercial with pockets of high-density residential uses in the northwestern and northeastern portions of the downtown area. Development under this alternative would include 60 fewer residential units compared to the proposed project. Minor inconsistencies would occur between Alternative 5 and the existing applicable land use plans governing development of the project area, similar to that identified for the proposed project. Amendments to the General Plan and Zoning Code would be undertaken to ensure conformity with the development proposed under this alternative. Similar to the proposed project, the intention of this alternative is to provide mixed-use residential and mixed-use commercial communities, which would enhance the efficiency and daily activity within the project area. Overall changes to the land use character would be similar to that described for the proposed project. On the whole, impacts would be *less than significant* under this alternative, and similar to the proposed project.

Noise

Under Alternative 5, future development would involve similar intensity as the Transit Zoning Code (SD 84A and SD 84B) area. As a result, impacts would be similar to the proposed project. Since the proposed project determined a less than significant impact with respect to operational noise, this alternative would not be anticipated to expose sensitive receptors in the project area to excessive noise levels, and impacts would remain *less than significant*.

Similar to the proposed project, construction activities under this alternative would be subject to the City's Municipal Code standards, and construction noise would be controlled. This impact would be *less than significant*, similar to the proposed project. Nonetheless, the potential for sensitive receptors to be subject to excessive vibration during construction would remain, similar to the proposed project, and would be considered *significant and unavoidable*. Impacts related to noise from the AT & SF railroad would still occur under this alternative since it does not affect the current use of trains. This impact would be considered *significant and unavoidable*.

Population and Housing

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

Full buildout of Alternative 5 would result in lesser impacts to population and housing as compared to the proposed project since 60 fewer residential units would be created and thus 180 fewer persons. The residential development potential of this alternative would include negligibly fewer residential units than the proposed project. The decrease in residential uses would also result in a negligible decrease in the anticipated population.

Because the projected increase of the anticipated residents in the City resulting from the proposed project is within, or under the limit of, the total population increase projected for the City between 2010 and 2035, and because this alternative would result in fewer new residents, the forecasted population growth in the City is not considered substantial relative to the surrounding areas. Therefore, this impact would be slightly less in magnitude when compared to the proposed project. Therefore, the anticipated increase, as a result of future development in the project area, would likely remain ***less than significant***, although less than the proposed project.

The beneficial impact of providing a net increase in residential housing units would be realized under Alternative 5, but to a lesser degree than the proposed project. Due to the fact that Alternative would provide slightly fewer residential units than the proposed project, this alternative would not perform as well as the proposed project in addressing a potential future housing shortage issue in the City.

Public Services

As the population increase would be slightly less (180 fewer residents) under this alternative compared to the proposed project, impacts to public services would also be less than the proposed project, as discussed below.

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

All new development places an increased burden on police services and causes a need for increased staff and increased space. Security concerns related to new uses within the project area would be addressed through the permit process, at which time the Santa Ana Police Department would have the opportunity to review the proposed uses and provide input on necessary security measures. Persons on-site or

elsewhere in the City would not be exposed to increased risks as a result of the additional demands on the Santa Ana Police Department as a result of development under this alternative. Further, the present police officer to population service ratio would be similar to the proposed project, and impacts would be ***less than significant***.

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

As negligibly fewer residential units would be developed under this alternative, the impact to library services would be less than the proposed project. The decrease of 180 residents from that would be expected as a result of the project would decrease demand on library services. The tax base afforded by the additional development within the Transit Zoning Code (SD 84A and SD 84B) area would contribute to the City's general fund, which is distributed to various City services, including libraries. Therefore, any necessary improvements/modifications to the existing Santa Ana library system would be implemented using the general fund and determined on an as-needed annual basis by the City. However, the overall increase in the number of residents would increase demand on library services and would be considered potentially significant. As such, impacts would remain ***less than significant***, similar to the proposed project.

Implementation of Alternative 5 would result in a lesser potential demand for additional recreational facilities in the project area; however, could result in the increased use of parks and recreational facilities. Payment of developer fees would ensure that adequate parkland is provided for all City residents per the City's Municipal Code. As such, impacts would be ***less than significant***, similar to the proposed project, although the anticipated level of parkland required for implementation of this alternative would be less than the proposed project.

Transportation

Development under this alternative would include substantially similar types and intensity of uses, traffic volumes along local street segments is anticipated to remain the same. The impacts to all intersections would still require mitigation as described in Section 4.11 and remain ***less than significant***. Impact 4.11-19 would remain ***significant and unavoidable*** because while the impacts to Grand Avenue at I-5 NB Ramps can be mitigated, it is beyond the jurisdiction of the City to make the necessary improvements. As buildout of both the proposed project and this alternative would both be subject to City code in regards to parking, impacts to parking would be similar to the proposed project and ***less than significant***. Impacts to emergency access would comply with existing policies contained in the General Plan and Municipal Code, and would be ***less than significant***, similar to the proposed project.

Utilities

Alternative 5, at buildout, would directly increase the population of the City by approximately 12,045 residents, resulting in increased demands for utilities. The population increase would be substantially similar to that of the proposed project, demands on utilities would be correspondingly similar; however, impacts would be *less than significant*.

5.3.7 Alternative 6—Rehabilitate 611 N. Minter Street in Place

■ Description

This alternative would retain the structures located at 611 N. Minter Street and require that they be rehabilitated in place. This property is identified as Property #17 in Figure 3-5 (Santa Ana Redevelopment Agency Parcels). The remainder of the structures located on the Agency-owned parcels would be demolished (Figure 5-1 – Demolitions). This Alternative would result in 101 rental units and 39 ownership residential units. This alternative affects only the Developer Project component of the overall proposed project (analysis of the Transit Zoning Code). All remaining aspects of the project description remain unchanged.

■ Impacts

Aesthetics

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

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

Similar to the proposed project, this alternative could result in obstruction of views of a scenic vista and/or focal views of places of public interest (e.g., historic resources, public art, or landmarks). Views of mountain ranges from within the project area are generally taken from viewsheds looking down street corridors, between existing buildings. Similar to the proposed project, this alternative would not develop new structures within street rights-of-way so existing viewsheds would not be blocked and views of the mountains from within the Transit Zoning Code (SD 84A and SD 84B) area would be preserved. The impacts upon scenic vistas of mountains from this alternative would be the same as the proposed project and are considered *less than significant*.

Development under this alternative would result in changes to the visual character and quality of the project area. Similar to the proposed project, Alternative 6 would temporarily adversely alter visual conditions associated with construction activities and equipment. As such, construction-related visual impacts associated with this alternative are considered *less than significant*, and would be equal to the proposed project.

This alternative would result in permanent impacts to the visual character or quality of the project area. The development proposed under this alternative would be similar to the proposed project and would apply the same design guidelines and new landscaping as the proposed project. Therefore, this impact would be considered *less than significant*.

Light and glare would also be expected to increase with implementation of this alternative, similar to the proposed project. This alternative includes the same mitigation measures applicable to the proposed project to ensure that future project design features would be developed to ensure that lighting and glare impacts from specific development projects would remain at less than significant levels. In consideration of already-substantial existing ambient lighting and glare in the Transit Zoning Code (SD 84A and SD 84B) area, adverse environmental impacts from increased light and glare associated with this alternative are anticipated to be less than significant. The provision of appropriate mitigation measures and specific project design features would ensure that lighting and glare impacts from specific development projects under this alternative would remain at *less-than-significant* levels.

This alternative would reduce the number of new structures constructed on the Agency-owned properties and, as such, would retain the structures located at 611 N. Minter Street, which does not exceed four stories in height. This would reduce the short-term likelihood of the construction of new structures in this portion of the Transit Zoning Code area that could contribute to increased shade and shadow impacts. However, the reduction in overall building height for this area would not significantly reduce the potential for shade and shadow impacts due to building heights allowed in the Downtown and Transit Village subzones of the Transit Zoning Code. As a result, impacts remain *significant and unavoidable* as they were under the proposed project.

Air Quality

Implementation of this alternative would provide new sources of regional air emissions. However, it was determined that the proposed project would not conflict with, and impair, implementation of the Air Quality Management Plan (AQMP). Implementation of Alternative 6 would result in fewer residential development than the proposed project. Because future population levels would be consistent with SCAG projections, this alternative would also be considered consistent with the 2007 AQMP. Similar to the proposed project, this impact would be considered *less than significant*.

The total amount of emissions generated, including criteria pollutants, under this alternative could result in a similar but lesser amounts of construction to that of the proposed project since demolition will not occur on Agency-owned structures. The total emissions generated by construction of individual projects, which may have overlapping schedules would be expected to remain in exceedance of SCAQMD

thresholds and violate and/or contribute to an air quality violation. As a result, construction impacts on air quality would remain ***significant and unavoidable***, similar to the proposed project.

Operational impacts of this alternative, as well as the contribution of the alternative to an existing air quality violation are anticipated to remain ***significant and unavoidable*** due to the increase in development within the Transit Zoning Code (SD 84A and SD 84B) area.

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

Biological Resources

As described in the Environmental Setting, the majority of the Transit Zoning Code (SD 84A and SD 84B) area has been developed, paved, or landscaped and supports largely non-native plant species. Suitable habitat for sensitive mammal, reptile, amphibian, or fish species does not exist within the Transit Zoning Code (SD 84A and SD 84B) or adjacent areas, and there are no wildlife migration corridors. In addition, no threatened, endangered, or sensitive species have been reported to occur within the Transit Zoning Code (SD 84A and SD 84B) area. Impacts would be ***less than significant***, similar to the proposed project.

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

Cultural Resources

Development under this alternative would result in the preservation of the structure located on the Agency-owned parcel at 611 N. Minter Street. All other Agency-owned parcels will be demolished. Ground-disturbing activities could continue to occur in order to accommodate new development elsewhere throughout the project area. Consequently, the potential of encountering fossil-bearing soils and rock formations, destroying belowground paleontological resources, affecting archaeological sites and sites of cultural significance to Native Americans would still occur, similar to the proposed project. Given the lack of any documented buried cultural resources in the area, the probability of uncovering these resources is considered low. Mitigation measures identified for the proposed project would apply and would reduce impacts to ***less than significant***.

Although this alternative will reduce impacts to potentially historic properties on one Agency-owned parcel defined in the project description, development could still occur on other parcels within the Transit Zoning Code (SD 84A and SD 84B) area, the potential demolition of historic structures could still occur. Even though the mitigation measures associated with protection of historic resources for the

proposed project would apply, it is anticipated that impacts under this alternative would be **significant and unavoidable**, although lesser than the impacts of the proposed project.

Geology and Soils

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

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

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

Global Climate Change

Under this alternative, development intensity would be the substantially similar to that of the proposed project. Thus, the burning of combustible materials for heat, need for electricity would be expected to be the same and remain **significant and unavoidable**.

Hazards

Impacts related to Hazards and Hazardous Materials would be largely similar to the proposed project. Similar to the proposed project, there is potential for encountering soil contamination during construction, which could create a significant hazard to the public or the environment. Mitigation measures identified for the proposed project would reduce this impact to a **less-than-significant** level.

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

Similar to the proposed project, under this alternative, the City would be required to create an updated emergency response plan for the project area to ensure adequate emergency access and evacuation. Site plans for future development within the Transit Zoning Code (SD 84A and SD 84B) area would be reviewed by the City to ensure adequate police, ambulance, and fire personnel access to the proposed

project area. In addition, future developments would likely require further environmental analysis under CEQA which would include impact analysis of fire, police, and ambulance access. Traffic impacts within the Transit Zoning Code (SD 84A and SD 84B) area which could impact response plans and evacuation plans would be required to be mitigated to less than significant levels. After implementation of identified mitigation measures for the proposed project, development initiated under this alternative would not interfere with any emergency response or evacuation plans. This impact is considered *less than significant*, similar to the proposed project.

Although projects within the Transit Zoning Code (SD 84A and SD 84B) area could involve the use of some hazardous materials, applicable laws regarding upset and accident preparation and response would continue to be implemented as required for the proposed project. Existing regulations would be expected to minimize the potential for exposure to adverse health or safety effects. Therefore, development under this alternative would not involve the use of materials in a manner that poses any substantial hazards to people, or to animal or plant populations. Furthermore, the Santa Ana Fire Department would continue to provide emergency response services. As mentioned above, this alternative would not interfere with emergency response plans or emergency evacuation plans relating to hazardous materials because each of the future projects within the Transit Zoning Code (SD 84A and SD 84B) area would be required to go through plan checks with the fire department in addition to further environmental review of fire and emergency services. The types of hazardous materials anticipated are expected to be limited to regulated types and quantities. For these reasons, Alternative 6 would result in a *less-than-significant* impact related to the upset and accidental release of hazardous materials into the environment, similar to the proposed project.

Hydrology and Water Quality

Implementation of Alternative 4 would not result in significant impacts to hydrology or water quality. Grading and other earth moving activities during construction of individual projects within the project area could lead to an increase in suspended solids from surface flows during storm events, which could also impact surface water quality during storm events; however, any proposed development within the Transit Zoning Code (SD 84A and SD 84B) area under this alternative would have to satisfy all applicable requirements of the NPDES Program and the Santa Ana Municipal Code, including the preparation of a SWPPP, similar to the proposed project. Compliance with these requirements would ensure that all construction related impacts to water quality and waste discharge requirements would be *less than significant*.

During operational activities, pollutants may also be washed from the streets during non-storm events and this effect has the potential to degrade water quality and may result in significant impacts; however, development projects have a responsibility under the NPDES, to ensure pollutant loads from the projects do not exceed total maximum daily loads for downstream receiving waters. Under this alternative, development projects within the Transit Zoning Code (SD 84A and SD 84B) area would be required to submit and then implement a SUSMP containing design features BMPs appropriate and applicable to the individual projects. Potential water quality impacts would be *less than significant* with the preparation of required SUSMPs and implementation of the applicable BMPs, similar to the proposed project.

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

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

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

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

Land Use

Existing land uses within the project area are primarily characterized as industrial, residential, and commercial with pockets of high-density residential uses in the northwestern and northeastern portions of the downtown area. Development under this alternative would include 80 fewer residential units

compared to the proposed project. Minor inconsistencies would occur between Alternative 6 and the existing applicable land use plans governing development of the project area, similar to that identified for the proposed project. Amendments to the General Plan and Zoning Code would be undertaken to ensure conformity with the development proposed under this alternative. Similar to the proposed project, the intention of this alternative is to provide mixed-use residential and mixed-use commercial communities, which would enhance the efficiency and daily activity within the project area. Overall changes to the land use character would be similar to that described for the proposed project. On the whole, impacts would be *less than significant* under this alternative, and similar to the proposed project.

Noise

Under Alternative 6, future development would involve similar intensity as the Transit Zoning Code (SD 84A and SD 84B) area. As a result, impacts would be similar to the proposed project. Since the proposed project determined a less than significant impact with respect to operational noise, this alternative would not be anticipated to expose sensitive receptors in the project area to excessive noise levels, and impacts would remain *less than significant*.

Similar to the proposed project, construction activities under this alternative would be subject to the City's Municipal Code standards, and construction noise would be controlled. This impact would be *less than significant*, similar to the proposed project. Nonetheless, the potential for sensitive receptors to be subject to excessive vibration during construction would remain, similar to the proposed project, and would be considered *significant and unavoidable*. Impacts related to noise from the AT & SF railroad would still occur under this alternative since it does not affect the current use of trains. This impact would be considered *significant and unavoidable*.

Population and Housing

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

Full buildout of Alternative 6 would result in lesser impacts to population and housing as compared to the proposed project. The residential development potential of this alternative would include approximately 80 fewer residential units than the proposed project. The decrease in residential uses would also result in 240 fewer anticipated persons than the propose project.

Because the projected increase of the anticipated residents in the City resulting from the proposed project is within, or under the limit of, the total population increase projected for the City between 2010 and 2035, and because this alternative would result in fewer new residents, the forecasted population growth in the City is not considered substantial relative to the surrounding areas. Therefore, this impact would be slightly less in magnitude when compared to the proposed project. Therefore, the anticipated

increase, as a result of future development in the project area, would likely remain *less than significant*, although less than the proposed project.

The beneficial impact of providing a net increase in residential housing units would be realized under Alternative 6, but to a lesser degree than the proposed project. Due to the fact that Alternative 6 would provide slightly fewer residential units than the proposed project, this alternative would not perform as well as the proposed project in addressing a potential future housing shortage issue in the City.

Public Services

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

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

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

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

As slightly fewer residential units would be developed under this alternative, the impact to library services would be less than the proposed project. The decrease of residents from that would be expected as a result of the project would decrease demand on library services. The tax base afforded by the additional development within the Transit Zoning Code (SD 84A and SD 84B) area would contribute to the City's general fund, which is distributed to various City services, including libraries. Therefore, any necessary improvements/modifications to the existing Santa Ana library system would be implemented using the general fund and determined on an as-needed annual basis by the City. However, the overall increase in

the number of residents would increase demand on library services and would be considered potentially significant. As such, impacts would remain *less than significant*, similar to the proposed project.

Implementation of Alternative 6 would result in a lesser potential demand for additional recreational facilities in the project area; however, could result in the increased use of parks and recreational facilities. Payment of developer fees would ensure that adequate parkland is provided for all City residents per the City's Municipal Code. As such, impacts would be *less than significant*, similar to the proposed project, although the anticipated level of parkland required for implementation of this alternative would be less than the proposed project.

Transportation

Development under this alternative would include substantially similar types and intensity of uses, traffic volumes along local street segments is anticipated to remain the same. The impacts to all intersections would still require mitigation as described in Section 4.11 and remain *less than significant*. Impact 4.11-19 would remain *significant and unavoidable* because while the impacts to Grand Avenue at I-5 NB Ramps can be mitigated, it is beyond the jurisdiction of the City to make the necessary improvements. As buildout of both the proposed project and this alternative would both be subject to City code in regards to parking, impacts to parking would be similar to the proposed project and *less than significant*. Impacts to emergency access would comply with existing policies contained in the General Plan and Municipal Code, and would be *less than significant*, similar to the proposed project.

Utilities

Alternative 6, at buildout, would directly increase the population of the City by approximately 11,985 residents, resulting in increased demands for utilities. The population increase would be substantially similar to that of the proposed project, demands on utilities would be correspondingly similar; however, impacts would be *less than significant*.

5.4 SUMMARY COMPARISON OF ALTERNATIVES

Table 5-3 (Summary Comparison of Alternatives) summarizes the level of significance and relative magnitude of impacts from each alternative, when compared to the proposed project.

Table 5-3 Summary Comparison of Alternatives

Environmental Issue Area	Proposed Project	Alternative 1 (No Project/Reasonably Foreseeable Development)	Alternative 2 (Overall Reduced Density)	Alternative 3 (Low-Rise Project)	Alternative 4 (/Rehabilitate in Place/Acquire No Additional Properties)	Alternative 5 (Relocate and Rehabilitate on Agency-Owned Infill Sites)	Alternative 6 (Rehabilitate 611 N. Minter Street in Place)
Aesthetics	(1) SU	-	(1) SU/-	-	(1) SU/=	(1) SU/=	(1) SU/=
Air Quality	(3) SU	(3) SU/-	(3) SU/=	(3) SU/-	(3) SU/=	(3) SU/=	(3) SU/=
Biological Resources	LTS	=	=	=	=	=	=
Cultural Resources	(1) SU	(1) SU/=	(1) SU/=	(1) SU/=	(1) SU/-	(1) SU/-	(1) SU/-
Geology	LTS	=	=	=	=	=	=
Global Climate Change	(2) SU	(2) SU/-	(2) SU/-	(2)SU/-	(2) SU/=	(2) SU/=	(2) SU/=
Hazards and Hazardous Materials	LTS	=	=	=	=	=	=
Hydrology	LTS	=	=	=	=	=	=
Land Use	LTS	-	=	=	=	=	=
Noise	(2) SU	(2) SU/-	(2) SU/+	(2) SU/=	(2) SU/=	(2) SU/=	(2) SU/=
Population and Housing	LTS	-	-	-	-	-	-
Public Services	LTS	-	-	-	-	-	-
Transportation	(1) SU	(1) SU/+	(1) SU/-	(1) SU/-	(1) SU/=	(1) SU/=	(1) SU/=
Utilities and Service Systems	LTS	=	-	-	-	-	-

(SU) = Significant and Unavoidable

(LTS) = Less Than Significant

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

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

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

5.5 ATTAINMENT OF PROJECT OBJECTIVES

Alternative 1 – The No Project/Reasonably Foreseeable Development Alternative would achieve some of the project objectives, but would not achieve others (or would achieve them to a lesser degree than the proposed project.) In addition, it would lack the design cohesion through the project guidelines as set forth by the proposed project and would not address existing land use inconsistencies and incompatibilities.

Alternative 2 – By reducing the overall development intensity by 25 percent as in Alternative 2, it is likely that the project’s objective will not be realized due to the fact that a mixed-use urban and transit-oriented neighborhood requires a critical mass and balance between residential and non-residential uses. By reducing the development intensity by 25 percent, no significant and unavoidable impacts are reduced to less than significant levels. One study area intersection is improved from LOS E to D but all of the other impacted intersections remain significant. Further, Alternative 2 would not emphasize the use of the SARTC for City residents to the extent that the proposed project would.

Alternative 3 – Alternative 3 would also achieve the majority of the project objectives, but would not improve the jobs/housing balance within the City to the level of the proposed project. In addition, Alternative 3 would keep development within the City limited to low- to mid-rise development, which would not serve to increase the perception of the City as a regional attraction for employment, tourism, and commerce, nor would it contribute to the critical mass necessary to support transit development.

Alternative 4 – Alternative 4 would rehabilitate the existing structures in place on Agency-owned land. This alternative would represent 154 fewer affordable housing units, while not reducing any of the significant and unavoidable impacts to less than significant levels.

Alternative 5 – Alternative 5, similar to Alternative 4, will create 60 fewer units without reducing the significant and unavoidable impacts to less than significant levels. In addition, this alternative represents significantly higher cost per unit (\$50,000 additional cost per unit¹) due to relocation of some existing structures.

Alternative 6 – Alternative 6 would rehabilitate in place the existing structures located at 611 N. Minter Street. This alternative also will not reduce any impacts from a significant level to a less than significant level and will increase the per unit cost slightly. This alternative will also create 80 fewer affordable residential units.

5.6 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

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

Alternative 1 (No Project/Reasonably Foreseeable Development [Continuation of Existing General Plan]) does reduce two of the proposed project’s significant impacts to a less-than-significant level, but it does not lessen the severity of many of the impacts, as noted in Table 5-3 (Summary Comparison of Alternatives).

¹ Memorandum to the City of Santa Ana from Keyser Marston Associates regarding EIR Alternatives Testing. Dated February 23, 2010.

Alternative 2 would reduce the potential impacts of the currently proposed Transit Zoning Code (SD 84A and SD 84B), although not to the degree of reducing a significant and unavoidable impact to less than significant and therefore not to the degree of Alternative 1.

Alternative 3 would reduce one of the proposed project's significant impacts to a less-than-significant-level but the other five impacts of the proposed project that are considered significant and unavoidable would remain.

Alternative 4 would slightly reduce impacts to historic resources, but not to a less-than-significant level. All other impacts remain unchanged.

Alternative 5 would slightly reduce impacts to historic resources, but not to a less-than-significant level. All other impacts remain unchanged.

Alternative 6 would slightly reduce impacts to historic resources, but not to a less-than-significant level. All other impacts remain unchanged.

Alternative 1 would, therefore, be environmentally superior to the proposed project because the significant environmental impacts to aesthetics, air quality, land use, noise, public services, and utilities and service systems would be lessened to the greatest extent, since this alternative proposes the least amount of future residential and overall development, however, Alternative 1 does not fully meet the project objectives, as noted above.