

## 7. Project Alternatives

### 7.1 Introduction

The California Environmental Quality Act (CEQA) requires that Environmental Impact Reports "...describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives" (Guidelines §15126(d)). The CEQA Guidelines direct that the selection of alternatives be governed by "a rule of reason." The alternatives selected for detailed review in the EIR must be limited to those that "would avoid or substantially lessen any of the significant effects of the project" and would "feasibly attain most of the basic objectives of the project." The selection of alternatives and their discussion must "foster meaningful public participation and informed decision making" (Guidelines §15126(d)(5)).

CEQA requires the evaluation of the "No Project Alternative." The purpose of describing and analyzing a No Project alternative is to allow decision makers to compare the impacts of approving a proposed project with the impacts of not approving a project. The CEQA Guidelines suggest that the No Project alternative include two scenarios: 1) existing conditions – i.e., a comparison of the environmental effects of the property remaining in its existing state against the environmental effects that would occur if the project is approved; and 2) future conditions that would reasonably be expected to occur based on current plans, available infrastructure and community services.

CEQA also requires the consideration of alternative locations on which the project could be developed if significant impacts have been identified that could be avoided or substantially lessened if the project were put in another location. The EIR has identified both project-specific and cumulative air quality impacts (both from short-term construction and long-term operational emissions) as the only project impacts that are significant and unavoidable. After consideration of all factors, the City of Brea as lead agency has determined that these air quality impacts would not be avoided or substantially lessened by transferring development to another site, and therefore, consideration of locating the entire Project on an alternative site is not considered in this EIR. The following sections present a range of reasonable alternatives in compliance with the requirements of CEQA.

CEQA Guidelines §15126.4(f) states that the range of alternatives required in an EIR is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice and which, in the opinion of the lead agency, could feasibly attain most of the basic objectives of the project. Among the factors that may be taken into account when evaluating the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, General Plan consistency, other plans or regulatory limitations, and jurisdictional boundaries.

This EIR considers the following alternatives to the project:

- No Project Alternative: Continuation of Existing Uses
- No Project Alternative: Development According to the Existing General Plan
- Reduced Development

An EIR must also identify an “environmentally superior” alternative among those examined, and where the No Project Alternative is identified as environmentally superior, the EIR must identify an environmentally superior alternative from among the other alternatives. The environmental impacts of each alternative are compared to the proposed project and evaluated as to whether their impacts would be similar to the proposed project, greater, or less than the proposed project. With respect to the proposed Project, only project impacts involving air quality have been found to be significant and unavoidable, as noted previously. Section 7-17 identifies the environmentally superior alternative.

## **7.2 Alternative A: No Project/No Development**

This Alternative would retain the existing golf course on the Birch Hills site while the La Floresta Village site would remain vacant. None of the infrastructure improvements envisioned with the proposed Project would occur.

### **7.2.1 Aesthetics**

The No Project/No Development Alternative would not result in the alteration of the existing visual character of either project site, or the generation of any additional light and glare. No significant visual impacts have been identified in association with the proposed Project at either the Birch Hills or La Floresta Village site. The proposed Project would, however, substantially alter the existing visual environment from a vacant undeveloped character to a developed character on the La Floresta Village site, and intensify development on the Birch Hills site. This Alternative is consequently considered superior to the proposed Project with respect to aesthetic impacts.

### **7.2.2 Agricultural Resources**

This Alternative would avoid any impacts to existing agricultural activities on the La Floresta Village site. These activities are, however, not consistent with planned land use and have been considered an interim use by the City of Brea for many years, and the discontinuation of these activities is not considered a significant impact from a policy standpoint. The existing agricultural operation on the La Floresta Village site is also limited in size (21.3 acres). The Birch Hills site contains no agricultural activities, thus this topic is not applicable to that site. No significant impacts to agricultural resources have been identified with respect to the proposed Project. The No Project/No Development Alternative is, nonetheless, considered superior to the proposed Project in that no physical loss of agricultural land would occur.

### **7.2.3 Air Quality**

The No Project/No Development Alternative would avoid all construction air quality impacts since no new construction would occur on either site. At the time the NOP was published, demolition activities were still underway at the La Floresta Village site, and under the No Project/No Development Alternative demolition activities would be completed as with the proposed Project. Construction emissions for the proposed Project were determined to be significant even with mitigation; therefore, the No Project/No Development alternative would reduce impacts during construction.

Operational emissions would be substantially less for this Alternative as compared to the proposed Project since no new residential use would be developed at the Birch Hills site and the La Floresta Village site would remain vacant. Operational emissions were

determined to be significant and unavoidable for the proposed Project; therefore, the No Project/No Development would result in a substantial reduction in impacts as compared to the Project, and is considered superior to the proposed Project with respect to all air quality impacts.

### **7.2.4 Cultural Resources**

This Alternative would not result in the alteration of the existing use of either project site. No significant impacts to cultural resources have, however, been identified in association with the proposed Project at either the Birch Hills or La Floresta Village site. The Birch Hills development plan would actually result in the enhancement of remaining historical remnants of the Pacific Electric Railway line that traverses the site. Consequently, this Alternative is considered inferior to the proposed Project with respect to cultural resources.

### **7.2.5 Geology and Soils**

No grading activities would occur with the No Project/No Development Alternative; therefore, no associated impacts would occur. Since the La Floresta Village site would remain vacant, however, erosion could occur unless preventative steps were taken. Under the Alternative, no new habitable structures would be built on either Project site. As a result, there would be no increase in various risks from exposure to seismic activity as compared to the proposed Project. No unmitigable significant impacts related to geology and soils were identified for the proposed Project. The No Project/No Development scenario would, however, result in reduce impacts associated with geology and soils. The No Project/No Development Alternative is therefore considered superior to the Proposed Project with respect to soils and geology impacts.

### **7.2.6 Hazards and Hazardous Materials**

Remediation of site contamination that has been identified on the La Floresta Village site would be required by existing regulations even if no development occurred. Since no development would occur with this Alternative, there would, however, be no potential exposure of construction workers or future residents to hazardous materials. No unmitigable significant impacts related to hazards and hazardous materials were identified for the proposed Project. Impacts associated with hazards and hazardous materials would be reduced under the No Project/No Development scenario as noted. The No Project/No Development Alternative is therefore considered superior to the Proposed Project with respect to hazards and hazardous materials impacts.

### **7.2.7 Hydrology and Water Quality**

The No Project/No Development Alternative would result in no changes to existing drainage and water quality conditions. The proposed Project would have potentially significant impacts from erosion and siltation during construction, but these can be

mitigated to a level that is less than significant. The proposed Project would also introduce potential pollutants from urban runoff into drainage courses, but these impacts would also be mitigated to a level of insignificance through standard requirements and mitigation measures. The proposed Project would expose occupants of La Floresta Village to risk of flooding in the event of a failure of Carbon Canyon Dam, but this would be mitigated to a less than significant level through the preparation and implementation of an La Floresta Village emergency response plan. Because potential impacts for this Alternative would be reduced as compared to the proposed Project, it is considered superior to the proposed Project with respect to hydrology and water quality impacts.

### **7.2.8 Land use and Planning**

The existing land uses and planning entitlements would remain in place on both project sites under the No Project/ No Development Alternative. This Alternative would eliminate the proposed affordable workforce housing from the Birch Hills site, which would prevent the City from making progress toward its Housing Element objectives and other land use objectives contained in the General Plan which could be considered a significant impact. Consequently, the No Project/No Development Alternative is considered inferior to the proposed Project with respect to land use and planning impacts.

### **7.2.9 Noise**

This Alternative would avoid all construction noise impacts since no new construction would occur on either site. Construction noise for the proposed Project was, however, determined to be less than significant with mitigation.

Long-term operational noise generated off-site by Project traffic would be substantially less for this Alternative as compared to the proposed Project since no new residential use would be developed at the Birch Hills site and the La Floresta Village site would remain vacant. Off-site traffic noise was not determined to be significant for the proposed Project. The No Project/No Development would, however, result in a reduction in off-site noise impacts as compared to the proposed Project.

Noise impacts to sensitive on-site uses such as homes from traffic on adjacent arterials and from proposed on-site commercial development in the La Floresta Village development would no longer be relevant with this Alternative since no new construction would occur on either site. With mitigation, impacts to sensitive receptors on-site were not identified as a significant impact with the proposed Project. The No Project/No Development would, however, eliminate such noise impacts compared to the proposed Project.

In summary, the No Project/No Development Alternative would reduce or eliminate all noise impacts associated with the proposed Project. Consequently, it is considered superior to the proposed Project with respect to noise

### **7.2.10 Population and Housing**

No increase in population or housing would occur under this Alternative. This Alternative would eliminate the proposed affordable workforce housing from the Birch Hills site, which would prevent the City from making progress toward its Housing Element objectives and improving the jobs/housing balance, which could be considered a significant impact. Consequently, the No Project/No Development would be considered inferior to the proposed Project.

### **7.2.11 Public Services and Utilities**

No increase in population or housing would occur under the No Project/No Development Alternative, thus no increase in demand for public services or utilities would occur. Public services and utilities impacts were identified as less than significant for the proposed Project. The No Project/No Development Alternative would, however, eliminate all services and utilities impacts associated with the proposed Project. Consequently, it is considered superior to the proposed Project with respect to these impacts.

### **7.2.12 Traffic and Circulation**

Under the No Project/No Development Alternative, no change in land use would occur, thus no additional traffic would be generated. Existing conditions would continue. No significant traffic impacts have been identified in association with the proposed Project after mitigation measures are implemented. The No Project/No Development Alternative would, however, eliminate all traffic generation related to the proposed Project. Consequently, it is considered superior to the proposed Project with respect to traffic impacts.

## **7.3 Alternative B: No Project/Existing General Plan Entitlements**

Alternative B describes the level of development that could occur on the sites under the existing General Plan entitlements. The Birch Hills site is designated for High-Density residential uses (12 to 24 units per acre) and 9.46 acres of open space. However, the General Plan EIR assumed 213 Low Density Residential Units; therefore, that assumption is also used for this Alternative.

The La Floresta Village site is designated Mixed-Use II in the General Plan. For purposes of this analysis it is assumed that 646 units of Mixed Use Residential and 515,400 square feet of mixed use commercial could be developed.

With both sites considered, this Alternative would result in 476 fewer residential units (1,335 – 859) but 358,600 square feet more commercial floor area (515,400 – 156,800) than the proposed Project.

### **7.3.1 Aesthetics**

This Alternative would result in the alteration of the existing visual character of the La Floresta Village site in a manner similar to the proposed Project. Commercial development on the La Floresta Village site would, however, comprise a larger portion of the project under General Plan assumptions. Due the increased commercial intensity, aesthetic and light and glare impacts could thus be somewhat greater than the proposed Project.

Development permitted under the General Plan on the Birch Hills site would eliminate the existing golf course and replace it with single family housing over the majority of the site. This would substantially alter the existing visual character of the site, which could be considered a significant aesthetic impact. Generation of new light and glare would also increase. Alternative B would, thus, be considered inferior to the proposed project relative to aesthetics impacts.

### **7.3.2 Agricultural Resources**

The No Project/Existing General Plan Alternative would result in the same impacts to existing agricultural activities on the La Floresta Village site as the proposed Project. Existing agricultural activities would be eliminated. These activities are, however, not consistent with planned land use and have been considered an interim use by the City of Brea for many years. Their discontinuation is not considered a significant impact. The Birch Hills site contains no agricultural activities, thus this topic is not applicable to that site. Alternative B is not considered either inferior or superior to the proposed Project relative to agricultural resources.

### **7.3.3 Air Quality**

Alternative B would allow substantially more commercial development than the proposed project, which would generate approximately 60% more traffic and thus more pollutant emissions than the proposed Project. It is assumed that a similar amount of land area would be disturbed by grading on both sites, but approximately 117,000<sup>11</sup> less square feet of building construction would occur. Emissions due to construction activities would therefore be marginally less than for the proposed Project. Long-term operational emissions would be substantially greater than the proposed Project due to increased commercial development intensity and resulting traffic. Overall, this Alternative would be considered inferior to the proposed Project with respect to air quality impacts.

### **7.3.4 Cultural Resources**

The No Project/Existing General Plan Alternative would allow development more intense than the proposed project; however, impacts to cultural resources are location specific and not driven by development intensity. Impacts due to grading and site preparation would be similar to the proposed Project. It is assumed that preservation of the historical remnants of the Pacific Electric Railway on the Birch Hills site would still occur under Alternative B in order to be consistent with General Plan policies. No unmitigable significant impacts related to cultural resources were identified for the proposed Project. Alternative B is not considered either inferior or superior to the proposed Project relative to cultural resources.

### **7.3.5 Geology and Soils**

This Alternative would allow development more intense than the proposed Project, however, impacts to geology and soils are location-specific and not directly affected by development intensity. Therefore, Impacts due to geology and grading would be considered similar to the proposed Project. No unmitigable significant impacts related to geology and soils were identified for the proposed Project. Alternative B is not considered either inferior or superior to the proposed Project relative to cultural resources.

### **7.3.6 Hazards and Hazardous Materials**

The No Development/Existing General Plan Alternative would allow development more intense than the proposed Project; however, impacts regarding hazards and hazardous materials are location-specific and not directly affected by development intensity. Therefore, impacts regarding hazardous materials and remediation would be similar to the proposed Project. No unmitigable significant impacts related to hazards and hazardous materials were identified for the proposed Project. Alternative B is not considered either inferior or superior to the proposed Project relative to impacts associated with hazards and hazardous materials.

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<sup>11</sup> Assuming an average residential unit size of 1,000 square feet.

### **7.3.7 Hydrology and Water Quality**

Alternative B would allow commercial development that is more intense than the proposed Project. Also, low-density residential development in the Birch Hills site would be expected to result in more developed area than the clustered high-density housing in the proposed Project. Impacts to hydrology and water quality could therefore be greater than the proposed project due to the increased development area and greater proportion of impervious surfaces that would be expected with increased commercial development and lower density residential development. This alternative would be considered inferior to the proposed Project with respect to hydrology and water quality.

### **7.3.8 Land Use and Planning**

It is assumed that this Alternative would also provide affordable workforce housing on one or the other project site. Consequently, the housing policy impacts of Alternative B would be similar to the proposed Project. No other land use or housing policy impacts would occur under this Alternative. No adverse or significant land use or housing policy impacts have been identified in association with the proposed Project

Alternative B would result in a substantially more intense commercial development in Planning Area 5 on the La Floresta Village site and fewer residential dwellings. While this would not be inconsistent with land use policy, increased commercial development could generate adverse impacts such as increased light and glare, traffic, noise, and visual impacts in comparison with the proposed Project.

Development permitted under the General Plan on the Birch Hills site would eliminate the existing golf course and replace it with single family housing over the majority of the site. While this would not be inconsistent with land use policy, it could generate adverse land use driven impacts such as increased light and glare, traffic, noise, and visual impacts in comparison with the proposed Project. This Alternative would be considered inferior to the proposed Project relative to land use, planning and housing impacts.

### **7.3.9 Noise**

This Alternative would allow development that is more intense than the proposed Project. Noise due to construction activities would not, however, be substantially different than the proposed Project.

Long-term operational noise impacts resulting from project-related traffic on surrounding roadways would be greater for this Alternative than the proposed Project due to higher traffic generation. Noise impacts to on- or off-site sensitive uses from commercial development would be similar to the proposed Project. None of these were identified as significant impacts of the proposed Project, and this Alternative would be considered inferior to the proposed Project with respect to noise generation.

### **7.3.10 Population and Housing**

Alternative B would result in 476 fewer housing units than the proposed Project, with a corresponding reduction in resident population. The higher level of commercial development on the La Floresta Village site compared to the Project would generate more employment and related housing demand, however, partially offsetting this reduction. This Alternative would not offer the benefits to regional jobs-housing balance provided by the Project, nor would it be expected to provide any affordable workforce housing. In consideration of these factors, this alternative would be deemed inferior to the proposed Project relative to population and housing.

### **7.3.11 Public Services and Utilities**

The No Project/ Existing General Plan Alternative would allow commercial development that is substantially more intense than the proposed Project. However, in terms of most public service needs, impacts would be similar to the proposed Project. School impacts would be reduced, while demand for police and fire protection could increase due to more intense commercial development. No significant impacts with regard to public services were, however, identified for the proposed Project. Alternative B is not considered either inferior or superior to the proposed Project relative to impacts to public services and utilities.

### **7.3.12 Traffic and Circulation**

Austin Foust Associates has estimated trip generation for Alternatives B and C, as illustrated in Table 7.3-1, and compared them with the proposed project. As shown, Alternative "B" would result in substantially greater traffic generation than the proposed Project (approximately 60%). Although this analysis has not been taken to the level of ICU impacts, it can be safely assumed that the increased traffic generation associated with Alternative "B" would also significantly impact additional intersections. This could also result in land use impacts if impacted intersections required right-of-way acquisition that would encroach on existing uses to mitigate increased traffic impacts. For these reasons, this Alternative is considered inferior to the proposed Project relative to traffic and circulation impacts.

**Table 7.3-1  
Project Alternatives – Land Use and Trip Generation Summary –  
La Floresta Development Proposal**

Land Use	Amount	Unit	AM Peak Hour			PM Peak Hour			ADT
			In	Out	Total	In	Out	Total	
<b>Alternative B</b>									
<b>La Floresta Village Site</b>									
13. Parks/Rec/O.S.	9.46	AC	2	0	2	0	0	0	15
16. Mixed Use Res	646.00	DU	52	277	329	271	129	400	4,283
17. Mixed Use Comm. I	515.40	TSF	572	149	721	722	979	1,701	16,885
<b>Subtotal</b>			<b>626</b>	<b>426</b>	<b>1,052</b>	<b>993</b>	<b>1,108</b>	<b>2,101</b>	<b>21,183</b>
<b>Birch Hills Site</b>									
3. Low Density Res	213.00	DU	40	119	159	138	77	215	2,038
<b>Project Totals</b>									
3. Low Density Res	213.00	DU	40	119	159	138	77	215	2,038
13. Parks/Rec/O.S.	9.46	AC	2	0	2	0	0	0	15
16. Mixed Use Res	646.00	DU	52	277	329	271	129	400	4,283
17. Mixed Use Comm. I	515.40	TSF	572	149	721	722	979	1,701	16,885
<b>GRAND TOTAL</b>			<b>666</b>	<b>545</b>	<b>1,211</b>	<b>1,131</b>	<b>1,185</b>	<b>2,316</b>	<b>23,221</b>
<b>Proposed Project</b>			301	647	948	825	596	1,421	14,574
<b>Difference (Alt. B – Proposed Project)</b>			<b>365</b>	<b>102</b>	<b>263</b>	<b>306</b>	<b>589</b>	<b>895</b>	<b>+8,647</b>
<b>Alternative C</b>									
<b>La Floresta Village Site</b>									
4. Medium Density Res	398.00	DU	52	200	252	211	112	323	3,224
5. High Density Res	540.00	DU	43	233	276	227	108	335	3,580
13. Parks/Rec/O.S.	16.00	AC	3	0	3	1	1	2	26
30. Public Facility (Adult)	5.30	AC	0	0	0	0	0	0	0
<b>SUB-TOTAL</b>			<b>98</b>	<b>433</b>	<b>531</b>	<b>439</b>	<b>221</b>	<b>660</b>	<b>6,830</b>
<b>Birch Hills Site</b>									
3. Low Density Res	28.00	DU	5	16	21	18	10	28	268
5. High Density Res	132.00	DU	11	57	68	55	26	81	875
14. Natural Open Space	75.60	AC	0	0	0	0	0	0	0
31. Community Center	20.00	TSF	0	0	0	0	0	0	0
<b>SUB-TOTAL</b>			<b>16</b>	<b>73</b>	<b>89</b>	<b>73</b>	<b>36</b>	<b>109</b>	<b>1,143</b>
<b>Project Totals</b>									
3. Low Density Res	28.00	DU	5	16	21	18	10	28	268
4. Medium Density Res	398.00	DU	52	200	252	211	112	323	3,224
5. High Density Res	672.00	DU	54	290	344	282	134	416	4,455
13. Parks/Rec/O.S.	16.00	AC	3	0	3	1	1	2	26
14. Natural Open Space	75.60	AC	0	0	0	0	0	0	0
30. Public Facility (Adult)	5.30	AC	0	0	0	0	0	0	0
31. Community Center	20.00	TSF	0	0	0	0	0	0	0
<b>GRAND TOTAL</b>			<b>114</b>	<b>506</b>	<b>620</b>	<b>512</b>	<b>257</b>	<b>769</b>	<b>7,973</b>
<b>Proposed Project</b>			301	647	948	825	596	1,421	14,574
<b>Difference (Alt. C – Proposed Project)</b>			<b>-187</b>	<b>-141</b>	<b>-328</b>	<b>-313</b>	<b>-339</b>	<b>-652</b>	<b>-6,571</b>
Abbreviations: Comm. – commercial      TSF – thousand square feet DU – dwelling unit                              AC - acres									

## 7.4 Alternative C: Reduced Development

Alternative C – Reduced Density envisions 28 single-family residential units (6 du/gross acre) in Sub-Area 12a of the Birch Hills site rather than 115 very-high-density workforce units. The remaining planning areas on the Birch Hills site would be identical to the proposed Project, with 132 high-density residential units in Sub-Area 12b and a new 20,000-square-foot community center, retention of the existing 5,500-square-foot clubhouse, and 75.6 acres of open space (golf course) in Sub-area 13. It is assumed that preservation of the historical remnants of the Pacific Electric Railway on the Birch Hills site would not occur under Alternative C.

For the La Floresta Village site, the commercial and mixed-use development in Planning Area 5 (156,800 square feet) would be replaced with a public park facility or open space in this Alternative. As shown in the Table 7.4-1, a total of 938 residential units would be built rather than 1,088 as in the proposed Project. Total residential units for both sites under this alternative would be 966 compared to 1,335 for the proposed Project (a 28% reduction).

**Table 7.4-1  
Alternative C: Reduced Density Assumptions –  
La Floresta Village Site**

Planning Area	Land Use	Acreage (acres)	Net Density (du/ac)	Total Dwelling Units (du)
1	Residential-Medium Density	6.8	14.5	99
2	Residential- Low Density	13.0	5.0	65
3	Residential-Low Density	12.1	8.5	107
4a	Residential- Medium Density	4.3	13.0	56
4b	Residential-Medium Density	2.7	13.0	35
5	Park/OS	16.0		
6	Residential-Low Density	4.6	5.0	23
7	Residential-High Density	10.0	15.0	150
8	Residential- Low Density	16.2	6.0	98
9	Residential-Medium High Density	7.0	28.5	200
10	Residential-Low Density	21.0	5.0	105
11	Public Facility	5.3	--	--
<b>La Floresta Village Site Total</b>		<b>119.0</b>	<b>--</b>	<b>938</b>

### **7.4.2 Aesthetics**

This Alternative would result in the alteration of the existing visual character of both project sites in a manner similar to the proposed Project, with the exception of Planning Area 5 of the La Floresta Village site, which would be utilized for a public park of an unspecified nature. The type and degree of visual impacts would vary in Planning Area 5, however, depending on the type of park facility (active vs. passive uses) that might be built. The visual intensity of most park/recreational uses would be less than the proposed commercial/office development incorporated in the proposed Project. If active sports facilities were involved, however, there could be significant impacts such as light and glare, as well as possible structures that could have adverse visual effects.

The developed area on the Birch Hills site would be the same as the proposed Project, but the intensity of residential development would be decreased in Planning Area 12a from high-density to low-density residential. This would diminish visual impacts along Kraemer Boulevard to some degree. Industrial land uses are located across Kraemer Boulevard, however, which are not considered sensitive viewers. Any aesthetic change is, thus, not considered significant.

No significant visual or light and glare impacts have been identified in association with the proposed Project at either the Birch Hills or La Floresta Village site. Alternative C is not considered either inferior or superior to the proposed Project relative to potential aesthetics impacts.

### **7.4.3 Agricultural Resources**

Alternative C would result in the same impacts to existing agricultural activities on the La Floresta Village site as the proposed Project. Existing agricultural activities would be eliminated. These activities are, however, not consistent with planned land use and have been considered an interim use by the City of Brea for many years. Their discontinuation is not considered a significant policy impact. The Birch Hills site contains no agricultural activities, thus this topic is not applicable to that site. Alternative C is not considered either inferior or superior to the proposed Project relative to impacts to agricultural resources.

### **7.4.4 Air Quality**

The Reduced Development Alternative would allow development that is substantially less intense than the proposed Project. Since the area of disturbance from grading and construction activities would be similar to the Project, emissions due to construction activities would not be substantially different than the proposed Project. Long-term operational emissions would be expected to be substantially less than the proposed Project due to the 28% decrease in residential development, the elimination of 156,800 square feet of commercial area, and a corresponding 45% reduction in traffic generation. If an active park were developed in PA-5 of the La Floresta Village site; however, some portion of this reduction in air pollutant emissions would be offset. Overall,

this Alternative would be considered superior to the proposed project with respect to air quality.

#### **7.4.5 Cultural Resources**

Alternative C would allow development less intense than the proposed Project; however, impacts to cultural resources are location specific and not driven by development intensity. Therefore, Impacts due to grading and site preparation would be similar to the proposed Project. It is assumed that preservation of the historical remnants of the Pacific Electric Railway on the Birch Hills site would not occur under Alternative C. No unmitigable significant impacts related to cultural resources were identified for the proposed project. This Alternative would be considered inferior to the proposed Project relative to cultural resources impacts.

#### **7.4.6 Geology and Soils**

This Alternative would allow somewhat less intense development than the proposed Project, however, impacts to geology and soils are location-specific and not directly affected by development intensity. Therefore, impacts due to geology and grading would be considered similar to the proposed Project. No unmitigable significant impacts related to geology and soils were identified for the proposed Project. Alternative C is not considered either inferior or superior to the proposed Project relative to impacts associated with geology and soils.

#### **7.4.7 Hazards and Hazardous Materials**

Alternative C would allow somewhat less intense development than the proposed Project; however, impacts to hazards and hazardous materials are location-specific and are not directly affected by development intensity. Therefore, impacts related to hazardous materials and remediation would be similar to the proposed Project. No unmitigable significant impacts related to hazards and hazardous materials were identified for the proposed project. Alternative C is not considered either inferior or superior to the proposed Project relative to impacts associated with hazards and hazardous materials.

#### **7.4.8 Hydrology and Water Quality**

The Reduced Development Alternative would eliminate all commercial development in PA-5 of the La Floresta Village site and replace it with open space (park). Impacts to hydrology and water quality could be less than the proposed Project due to the nature of uses that could occur within commercial development, and increased permeable area that would occur in PA-5 with open space. No unmitigable significant impacts related to hydrology and water quality were identified for the proposed Project. This alternative would, however, still be considered marginally superior to the proposed Project with respect to hydrology and water quality.

### **7.4.9 Land Use and Planning**

It is assumed that this Alternative would not provide the proposed affordable workforce housing at the Birch Hills or the La Floresta Village site, which would prevent the City from making progress toward its Housing Element objectives and could be considered a significant impact. In addition, this Alternative would not fulfill a variety of General Plan Land Use policies adopted specifically for the La Floresta Village site. These include "Policies for the Creation of a Sense of Place" and "Policies for Creating Connections," which are listed in Section 5.1-2 under Regulatory Setting. Additional citywide urban design policies that would not be fulfilled by this alternative are also listed in Section 5.1-2, Regulatory. These focus on encouraging mixed use development.

This Alternative would result in less intense development in Planning Area 5 on the La Floresta Village site and fewer residential dwellings. Removal of the commercial support services would be inconsistent with land use policy established for the La Floresta Village site. It could, however, result in less intense land use driven impacts such as light and glare, traffic, noise, and visual impacts in comparison with the proposed Project.

The developed area on the Birch Hills site would be the same as the proposed Project, but the intensity of residential development would be decreased in Planning Area 12a from high-density to low-density residential. Land use driven light and glare, traffic, noise, and visual impacts would be similar or less in comparison with the proposed Project.

No significant land use or housing impacts have been identified in association with the proposed Project at either the Birch Hills or La Floresta Village site. This alternative would be considered inferior to the proposed Project relative to land use and housing impacts in that it would not fulfill important housing policies.

### **7.4.10 Noise**

Alternative C would allow development that is less intense than the proposed Project. Since construction would occur on both sites, noise due to construction activities would not be substantially different than the proposed Project.

Long-term operational noise impacts resulting from project-related traffic on surrounding roadways would be less than the proposed Project, but would not eliminate a significant impact. Similarly, traffic noise impacts on the proposed development from adjacent roadways would be very similar to the proposed Project. Noise impacts to on- or off-site sensitive uses from commercial development would be eliminated however, since this Alternative contains no non-residential uses. No significant noise impacts have been identified relative to the proposed Project. In consideration of these factors, Alternative C is not considered either inferior or superior to the proposed Project relative to noise impacts.

### **7.4.11 Population and Housing**

This Alternative would result in 369 fewer housing units than the proposed Project, with a corresponding reduction in resident population. It is assumed that this Alternative would

not provide affordable workforce housing at the Birch Hills site, which would prevent the City from making progress toward its Housing Element objectives and could be considered a significant impact. This Alternative would also result in reduced benefits to regional jobs-housing balance compared to the proposed Project. In consideration of these factors, this alternative would be deemed inferior to the Project.

#### **7.4.12 Public Services and Utilities**

This Alternative would allow development that is substantially similar to the proposed Project in terms of public service needs. No significant impacts with regard to public services were identified for the proposed Project. Alternative C is not considered either inferior or superior to the proposed Project relative to impacts to public services and utilities.

#### **7.4.13 Traffic and Circulation**

Austin Foust Associates has estimated trip generation for Alternatives B and C, as illustrated in Table 7.3-1 (page 7-11), and compared them with the proposed Project. As shown, Alternative "C" would result in substantially less traffic generation than the proposed Project (approximately 45%). This analysis has assumed a passive park use in PA-5 of La Floresta Village.

Although this analysis has not been taken to the level of ICU impacts, it can be safely assumed that the reduced traffic generation associated with Alternative "C" would also reduce impacts to specific intersections. For these reasons, this alternative is considered superior to the proposed Project relative to traffic and circulation impacts.

## **7.5 Environmentally Superior Alternative**

The proposed Project would not result in any significant impacts that could not be mitigated to less than significant levels by recommended mitigation, except for air quality impacts. The No Project/No Development Alternative would eliminate environmental impacts associated with the proposed project, but would not be consistent with any General Plan policies nor would it fulfill any objectives of the project applicant, and it is therefore rejected.

Alternative "B" (No Project Alternative/Existing General Plan Entitlements) would create greater impacts than the proposed Project, as illustrated in Table 7.5-1, in the areas of aesthetics, air quality, hydrology and water quality, land use and planning, noise, and traffic. Consequently, this Alternative is also rejected.

Alternative "C" (Reduced Development) could diminish impacts related to hydrology & water quality and traffic. The majority of impacts associated with the proposed Project, however, were not found to be significant. If traffic estimates for Alternative "C" assumed an active park facility in PA-5 of the La Floresta Village site, traffic impacts could be similar if not greater than the proposed project. Alternative "C", in addition, would not fulfill important General Plan policies such as provision of workforce housing and urban design policies that encourage creation of an "urban village" and a "sense of place" on the La Floresta Village site to the degree that the proposed Project does.

Neither Alternatives "B" nor "C" would avoid or substantially lessen the unavoidable impacts of the proposed Project. In consideration of these factors, none of the development Alternatives is considered to be substantially environmentally superior to the proposed Project.

**Table 7.5-1  
Comparison of Impacts of Project Alternatives –  
La Floresta Development Proposal**

<b>Impact</b>	<b>Alternative "A"-No Project/No Development</b>	<b>Alternative "B"- No Project/Existing General Plan Entitlements</b>	<b>Alternative "C"-Reduced Development</b>
Aesthetics	Superior to the Proposed Project	Inferior to Proposed Project	Similar to Proposed Project
Agricultural Resources	Superior to the Proposed Project	Similar to Proposed Project	Similar to Proposed Project
Air Quality	Superior to the Proposed Project	Inferior to Proposed Project	Superior to Proposed Project
Cultural Resources	Inferior to the Proposed Project	Similar to Proposed Project	Inferior to Proposed Project
Geology & Soils	Superior to the Proposed Project	Similar to Proposed Project	Similar to Proposed Project
Hazards & Hazardous Materials	Superior to the Proposed Project	Similar to Proposed Project	Similar to Proposed Project
Hydrology & Water Quality	Superior to the Proposed Project	Inferior to Proposed Project	Marginally Superior to the Proposed Project
Land Use and Planning	Inferior to the Proposed Project	Inferior to Proposed Project	Inferior to Proposed Project
Noise	Superior to the Proposed Project	Inferior to Proposed Project	Similar to Proposed Project
Population & Housing	Superior to the Proposed Project	Inferior to Proposed Project	Inferior to Proposed Project
Public Services & Utilities	Superior to the Proposed Project	Similar to Proposed Project	Similar to Proposed Project
Traffic & Circulation	Superior to the Proposed Project	Inferior to Proposed Project	Superior to the Proposed Project