

# 7. Alternatives to the Proposed Project

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## 7.1 INTRODUCTION

### 7.1.1 Purpose and Scope

The California Environmental Quality Act (CEQA) requires that an environmental impact report (EIR) include a discussion of reasonable project alternatives that would “feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any significant effects of the project, and evaluate the comparative merits of the alternatives” (CEQA Guidelines § 15126.6[a]). As required by CEQA, this chapter identifies and evaluates potential alternatives to the proposed project.

Section 15126.6 of the CEQA Guidelines explains the foundation and legal requirements for the alternatives analysis in an EIR. Key provisions are:

- “[T]he discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.” (15126.6[b])
- “The specific alternative of ‘no project’ shall also be evaluated along with its impact.” (15126.6[e][1])
- “The no project analysis shall discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. If the environmentally superior alternative is the ‘no project’ alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.” (15126.6[e][2])
- “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. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project.” (15126.6[f])
- “Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries..., and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent)” (15126.6[f][1]).

## 7. Alternatives to the Proposed Project

- “Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR.” (15126.6[f][2][A])
- “An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative.” (15126.6[f][3])

For each development alternative, this analysis:

- Describes the alternative.
- Analyzes the impact of the alternative as compared to the proposed project.
- Identifies the impacts of the project that would be avoided or lessened by the alternative.
- Assesses whether the alternative would meet most of the basic project objectives.
- Evaluates the comparative merits of the alternative and the project.

According to Section 15126.6(d) of the CEQA Guidelines, “[i]f an alternative would cause...significant effects in addition those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed.”

### 7.1.2 Project Objectives

As described in Section 3.1, the following objectives have been established for the proposed project and will aid decision makers in their review of the project, the project alternatives, and associated environmental impacts.

- 1) Provide contemporary housing solutions for Brea’s workforce population consistent with Brea Envisions.
- 2) Provide housing choices affordable to Brea’s workforce population, consistent with the City’s goals in the Housing Element to provide for a variety of housing types.
- 3) Develop housing proximate to Brea Downtown that can take advantage of the western access to the Rails to Trails as well as the Mercury Lane Bridge.
- 4) Provide additional opportunities for residential growth on infill parcels.
- 5) Improve the jobs-housing balance in the City of Brea and to provide new housing within close proximity to jobs and services.
- 6) Promote healthy living and physical activity by providing recreational amenities onsite and areas for secured bicycle storage to provide opportunities to utilize the alternative transportation options available proximate to the site.

## 7. Alternatives to the Proposed Project

### 7.2 ALTERNATIVES CONSIDERED AND REJECTED DURING THE SCOPING/PROJECT PLANNING PROCESS

The following is a discussion of the land use alternatives considered during the scoping and planning process and the reasons why they were not selected for detailed analysis in this EIR.

#### 7.2.1 Alternative Development Areas

CEQA requires that the discussion of alternatives focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project. The key question and first step in the analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR (CEQA Guidelines § 15126[5][B][1]). Key factors in evaluating the feasibility of potential offsite locations for EIR project alternatives include:

- If it is in the same jurisdiction.
- Whether development as proposed would require a General Plan Amendment.
- Whether the project applicant could reasonably acquire, control, or otherwise have access to the alternative site (or the site is already owned by the proponent). (CEQA Guidelines Section 15126.6[f][1])

The project applicant does not own or control other comparably sized and located property proximate to Brea Downtown. While the project requires approval of a Planned Community (PC) zone change, objectives for the project include providing workforce housing proximate to Brea Downtown on an infill site. The City of Brea's Mixed-Use zone only allows for up to 50 units an acre and there are no infill parcels designated for Mixed Use in or near Brea Downtown that meet this requirement.

In general, any development of the size and type proposed by the project would have substantially the same impacts on air quality, cultural resources, land use and planning, noise, population and housing, public services, transportation, and tribal cultural resources. With the exception of transportation impacts, these impacts were found to be less than significant or less than significant with mitigation incorporated. For traffic impacts, the proposed project would cumulatively contribute to traffic on Imperial Highway, improvements to which are outside of the City of Brea's jurisdiction. Therefore, any development proximate to Brea Downtown is likely also to trigger similar cumulative traffic impacts. Therefore, another location would not avoid or substantially lessen the effects of the project.

It was determined, therefore, that it is unlikely that there is an alternative project site that could potentially meet the objectives of the proposed project and reduce significant impacts of the project as proposed.

## 7. Alternatives to the Proposed Project

### 7.3 ALTERNATIVES SELECTED FOR FURTHER ANALYSIS

Based on the criteria listed above, the following three alternatives have been determined to represent a reasonable range of alternatives which have the potential to feasibly attain most of the basic objectives of the project, but which may avoid or substantially lessen any of the significant effects of the project. These alternatives are analyzed in detail in the following sections.

- No Project/No Development Alternative (required by CEQA)
- Existing Zoning Alternative
- Reduced Density Alternative

An EIR must identify an “environmentally superior” alternative and where the No Project Alternative is identified as environmentally superior, the EIR is then required to identify as environmentally superior an alternative from among the others evaluated. Each alternative's environmental impacts are compared to the proposed project and determined to be environmentally superior, neutral, or inferior. Impacts found to be significant and unavoidable include transportation (see Section 6 of this Draft EIR). The preferred land use alternative (proposed project) is analyzed in detail in Chapter 5 of this DEIR. This chapter provides a comparative analysis, by impact, for each of the alternatives. A conclusion with respect to an environmentally superior alternative is provided in Section 7.7.

#### 7.3.1 Alternatives Comparison

The following statistical analysis provides a summary of general socioeconomic buildout projections determined by the four land use alternatives, including the proposed project. It is important to note that these are not growth projections. That is, they do not anticipate what is likely to occur by a certain time horizon, but provide a buildout scenario that would only occur if all the areas of the City were to develop to the probable capacities yielded by the land use alternatives. The following statistics were developed as a tool to understand better the difference between the alternatives analyzed in the DEIR. Table 7-1, *Buildout Statistical Summary*, identifies City-wide information regarding dwelling unit, population and employment projections, and also provides the jobs to housing ratio for each of the alternatives.

**Table 7-1 Buildout Statistical Summary**

	Proposed Project	No Project/No Development Alternative	Existing Zoning Alternative	Reduced Density Alternative <sup>1</sup>
Dwelling Units	114	0	0	50
Population <sup>2</sup>	206	0	0	91
Employment	0	0	39	0
Jobs-to-Housing Ratio <sup>3</sup>	3.13	3.15	3.15	3.14

<sup>1</sup> Based on the Mixed Use (MU) zone, which allows 50 units/acre.

<sup>2</sup> Based on US ACS household size of 1.81 persons/household in Brea.

<sup>3</sup> Based on SCAG growth projections for the City of Brea in 2020 of 51,800 employees and 16,435 housing units (see Section 5.7, *Population and Housing*).

## 7. Alternatives to the Proposed Project

### 7.4 NO PROJECT/NO DEVELOPMENT ALTERNATIVE

The No Project alternative is required to discuss the existing conditions at the time the notice of preparation is published and evaluate what would reasonably be expected to occur in the foreseeable future if the proposed project is not approved (CEQA Guidelines, Section 15126.6(e)). Pursuant to CEQA, this alternative is also based on current plans and consistent with available infrastructure and community services. Therefore, the No Project/No Development Alternative assumes that the proposed Mercury Lane Residential project would not be adopted and no development would occur onsite. The project site would remain vacant and undeveloped. There would be no residential development nor any associated residents.

#### 7.4.1 Aesthetics

Impacts associated with aesthetics include the degradation of scenic vistas, scenic resources, and increased light and glare. Similar to the proposed project, the No Project/No Development Alternative would not impact a scenic vista or scenic resources in the City. Under the No Project/No Development Alternative, no new development would occur on the project site. Therefore, the existing visual character and resources near and on the project site would be preserved in their current state. Given that no development would occur, no new sources of light or glare would be generated either. Although aesthetics impacts are inherently subjective, the proposed project would improve the vacant, unmaintained site with a new residential building and landscaping. Therefore, it is concluded that the aesthetics impact for the No Project/No Development alternative (vacant, unmaintained lot) would be greater than for the proposed project. As with the proposed project, aesthetic impacts would be considered less than significant.

#### 7.4.2 Agriculture and Forestry Resources

The project site has no agricultural uses on it, nor are there agricultural uses within the project vicinity. The project site is in a highly urbanized area near Brea Downtown and is listed as Urban and Built-up Land by the Division of Land Resource Protection. Impacts of the No Project/No Development Alternative would be the same as the proposed project; there would be no impacts.

#### 7.4.3 Air Quality

Under this alternative, no new development would occur; therefore, no new construction activities and associated exhaust and fugitive dust emissions would occur. Under this alternative, an unpaved lot and unpaved property could have dust from wind. Without development, the site would not generate any increase in vehicle trips and building energy use. Therefore, the No Project/No Development Alternative would eliminate regional and localized air quality impacts during construction and operation compared to that of the proposed project. However, the proposed project would not result in any significant and unavoidable air quality impacts. Nevertheless, air quality impacts under this alternative would be reduced compared to the proposed project.

## 7. Alternatives to the Proposed Project

### 7.4.4 Biological Resources

There is no native habitat and no habitat suitable for sensitive species on-site. Under this alternative, the project site would remain vacant and undeveloped, eliminating impacts to the project site's existing biological resources, which are nesting birds. Although the proposed project would be in compliance with the California Fish and Game Code and would not have significant impacts to nesting birds, impacts to biological resources would be reduced compared to the proposed project.

### 7.4.5 Cultural and Paleontological Resources

Under the No Project/No Development Alternative, no grading and excavation activities would occur at the project site. Accordingly, this alternative would not result in the potential to impact archaeological and paleontological resources during ground-disturbing activities. Since no development would occur, there would be no potential damage to cultural resources. Impacts would be reduced compared to the proposed project.

### 7.4.6 Energy

The No Project/No Development Alternative would not generate a temporary increase in energy and fuel use during construction activities and would not generate a long-term increase in fuel use and energy during project operation. Therefore, no impact would occur under this alternative. Compared to the proposed project, impacts on energy would be reduced.

### 7.4.7 Geology and Soils

No new construction activities, including grading, would occur under the No Project/No Development Alternative. Therefore, there would be no potential for buildings, residents, and structures to experience seismic ground-shaking, or other geologic hazards. Overall, therefore, geologic and soils impacts would be reduced relative to the proposed project. These impacts would be less than significant without mitigation for both the No Project/No Development and proposed project (with regulatory compliance).

### 7.4.8 Greenhouse Gas Emissions

The No Project/No Development Alternative would not generate an increase in greenhouse gas (GHG) emissions from construction or operational activities. Therefore, no impact to GHG emissions would occur under this alternative. However, the proposed project improves the City's jobs-housing balance. Introducing residential development in areas proximate to alternative modes of transportation, job centers, and services has the potential to improve the City's GHG emissions efficiency in line with the objectives of the California Air Resources Board's (CARB) Scoping Plan and the Southern California Association of Government's (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Despite this beneficial impact of the project, impacts associated with this alternative would be reduced and would be less than significant.

## 7. Alternatives to the Proposed Project

### 7.4.9 Hazards and Hazardous Materials

Under this alternative, the project site is assumed to be vacant and undeveloped. Hazards to the public or environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials during construction activities (i.e., historic pesticide use), as a result of the proposed project would not occur. Impacts of the proposed project were found to be less than significant with mitigation incorporated; impacts of the alternative would be reduced compared to the proposed project.

### 7.4.10 Hydrology and Water Quality

Under this alternative, existing water quality conditions, groundwater supplies, drainage patterns, and runoff amounts would remain as is since no new development would occur. This alternative would not introduce new sources of water pollutants to the project area, from either construction or operation phases of development. However, this alternative would not include the development of new low-impact development, source control, site design, and treatment control best management practices (BMPs) to minimize runoff and water pollution. These BMPs are required measures that would occur under the proposed project and have a beneficial impact on stormwater quality. Overall, hydrology and water quality impacts would be slightly greater under this alternative but, as with the proposed project, would be less than significant.

### 7.4.11 Land Use and Planning

Unlike the proposed project, the No Project/No Development Alternative would not require a zone change to Planned Community (PC) zone. While the proposed project would require a zone change, the project would not conflict with policies and zoning that would result in physical impacts to the environment. Because retaining the site as a vacant lot would not require a zoning amendment, this alternative would reduce impacts of proposed project but, as with the proposed project, would be less than significant.

### 7.4.12 Mineral Resources

The project site is in MRZ-1, where significant mineral deposits are unlikely or not present. Further, no mining sites have been identified on or near the project site. Under this alternative and the proposed project, no impacts would occur to mineral resources and impacts would be the same.

### 7.4.13 Noise

Under the No Project/No Development Alternative the project site would remain undeveloped and would not introduce new long-term traffic or stationary noise onsite. Additionally, this alternative would eliminate construction-related noise impacts. No short-term construction or long-term operational noise impacts would occur with this alternative. However, no significant operational noise impacts were identified with the proposed project. Therefore, compared to the proposed project, impacts would be reduced.

## 7. Alternatives to the Proposed Project

### 7.4.14 Population and Housing

The No Project/No Development Alternative would not introduce new residents to the project site, and therefore would not directly impact population growth in the City. However, this alternative would not help increase housing units and provide workforce housing within the City of Brea. Additionally, this alternative would not result in a beneficial impact to the City's jobs-housing ratio. Like the proposed project, the No Project/No Development Alternative would not displace housing or people. Under both scenarios, impacts to population and housing would be less than significant. However, since the No Project/No Development Alternative would not achieve some of the beneficial impacts of the proposed project related to housing and job-housing balance, the impacts of the No Project/No Development alternative are considered greater than the proposed project.

### 7.4.15 Public Services

The No Project/No Development Alternative would not increase demand for fire, police, school, and library public services and facilities in the City. Impacts for the proposed project, however, are less than significant. Impacts would be reduced compared to the proposed project.

### 7.4.16 Recreation

No development would occur under this alternative, and the project site would remain vacant and undeveloped. Therefore, potential impacts to recreation would not occur. Although the No Project/No Development Alternative would not generate a demand for parks, it would not provide the onsite recreational benefits planned for the proposed project. Despite this beneficial impact, impact would be reduced compared to the proposed project, but would remain less than significant.

### 7.4.17 Transportation

The proposed project generates 653 average daily trips (ADT) with 43 trips during the AM peak hour and 53 trips during the PM peak hour.<sup>1</sup> As described in Section 5.9, *Transportation*, the proposed project would result in a significant unavoidable impact to three intersections along Imperial Highway (#10, Berry Street at Imperial Highway; #11, Brea Boulevard at Imperial Highway; and #11, State College Boulevard at Imperial Highway). While the EIR considered potential mitigation measures that would offset the project's cumulative impact at these intersections so that they operate at an acceptable LOS and/or reduce congestion below pre-project conditions, the installation of the improvements, improvements on Imperial Highway are subject to the approval of Caltrans. Additionally, Caltrans does not have any mechanisms by which projects can contribute fair share fees to offset impacts. Under this alternative, the project site would not generate an increase in vehicle trips or vehicle miles traveled (VMT). This alternative would eliminate the project's significant unavoidable impact on transportation compared to the proposed project. Therefore, this alternative would substantially reduce impacts compared to the proposed project.

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<sup>1</sup> Traffic modeling is based on a previous site plan with 120 residential units. The updated site plan has 114 units and would generate less average daily vehicle trips than identified in the traffic report.



## 7. Alternatives to the Proposed Project

### 7.4.18 Tribal Cultural Resources

The project site would remain in its existing conditions under the No Project/No Development Alternative. Thus, no ground-disturbing activities would occur, and tribal cultural resources onsite would not be affected. Impacts would be reduced in comparison to the proposed project. However, tribal cultural resources are not a significant and unavoidable impact of the proposed project.

### 7.4.19 Utilities and Service Systems

No development would occur on the project site under this alternative. Therefore, there would be no increase in demand for potable water and recycled water, wastewater generation, or solid waste disposal. Overall, impacts would be reduced in comparison to the proposed project, but would remain less than significant.

### 7.4.20 Wildfire

The project site is not in a State Responsibility Area or in or near a wildfire hazard severity zone. Emergency response or evacuation plans would not be impaired, and the project would not exacerbate pollution from wildfires, because the project site would remain vacant and undeveloped. This alternative would not require installation of infrastructure or modify slopes in a way that would exacerbate fire risk or increase flooding or landslides. Because this alternative would not introduce any new structures onsite; impacts would be reduced compared to the proposed project but would remain less than significant.

### 7.4.21 Conclusion

The No Project/No Development Alternative would lessen environmental impacts in the areas of air quality, biological resources, cultural resources, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, noise, public services, recreation, transportation, tribal cultural resources, utilities and service systems, and wildfire. This alternative would increase impacts to aesthetics, hydrology and water quality, and population and housing. Agriculture and forestry resources as well as mineral resources would have similar impacts compared to the proposed project.

The No Project/No Development Alternative would retain the site in the current state, as a vacant lot occasionally used for sorting charitable donations. Therefore, none of the project objectives would be achieved under this alternative. The No Project/No Development Alternative would not provide any of the project benefits that would occur with implementation of the proposed project, including investments to the site, such as landscaping, providing workforce housing, and increasing the number of housing units in the City to improve the jobs-housing balance.

## 7.5 EXISTING ZONING ALTERNATIVE

The project site is currently designated in the General Plan as Light Industrial and zoned Commercial-Industrial (C-M). The C-M zoning allows for the following uses:

## 7. Alternatives to the Proposed Project

- Administrative or professional offices
- Research and development
- Retail establishments
- Service establishments
- Light manufacturing

The C-M zone has a maximum height of 35 feet and a maximum lot coverage of 50 percent. Based on the C-M zoning for approximately one acre site, this alternative assumes that the project site would be developed as a 21,780-square-foot, light-industrial use building. This alternative would not introduce residential uses. Based on the SCAG employment density survey, this alternative would create up to 39 jobs (SCAG 2001).<sup>2</sup>

### 7.5.1 Aesthetics

Impacts associated with aesthetics include the degradation of scenic vistas, scenic resources, and increased light and glare. Similar to the proposed project, the Existing Zoning Alternative would not impact a scenic vista or scenic resources in the City. Impacts associated with this alternative would be similar to the proposed project because it would develop the project site, which is currently vacant and undeveloped. Although the building square footage and height would be reduced, other development standards and design guidelines would still apply. Therefore, impacts would be similar to the proposed project and would be less than significant.

### 7.5.2 Agriculture and Forestry Resources

The project site has no agricultural uses on it, nor are there agricultural uses within the project vicinity. The project site is located in a highly urbanized area near Brea Downtown and is listed as Urban and Built-up Land by the Division of Land Resource Protection. Impacts of this alternative would be the same as the proposed project; and no impact would occur.

### 7.5.3 Air Quality

The Existing Zoning Alternative would reduce air quality impacts during construction and operational phases, as development under this Alternative would result in a smaller 21,780-square-foot industrial building. As a result, peak construction emissions would be less than the proposed project. During the operational phase, this alternative would generate fewer vehicle trips (see Section 7.5.17) and less building energy. Consequently, this alternative would reduce long-term operational air quality impacts of the project. However, the proposed project's construction and operational activities would not exceed SCAQMD's thresholds. This alternative would reduce the air quality impacts, and impacts would be less than significant.

### 7.5.4 Biological Resources

This alternative would result in similar impacts to biological resources as the proposed project. As with the proposed project, this alternative would require removal of all vegetation on the approximately one-acre site.

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<sup>2</sup> Based on the average square feet per employee in Orange County for light manufacturing, which is 558 square feet per employee.

## 7. Alternatives to the Proposed Project

Similar to the proposed project, this alternative would also require compliance with the California Fish and Game Code and would not have significant impacts to nesting birds. Impacts under this alternative would be the same as the proposed project, and would be less than significant.

### 7.5.5 Cultural and Paleontological Resources

Implementation of this alternative would have the same, approximately one-acre, development footprint as the project, and could uncover cultural resources during grading activities. Both this alternative and the proposed project would require mitigation in the event cultural resources are uncovered during grading. Thus, impacts would be similar compared to the proposed project, and would be less than significant upon implementation of mitigation measures.

### 7.5.6 Energy

This alternative would result in a substantially smaller building compared to the proposed project (21,780 square feet compared to 141,137 square feet of the proposed project). As described above, during the operational phase of this alternative, it would generate fewer vehicle trips (see Section 7.5.17) and less building energy. Construction activities associated with this alternative would have reduced energy demands. Impacts would be reduced compared to the proposed project and would be less than significant.

### 7.5.7 Geology and Soils

This alternative would be required to comply with building and seismic codes and regulations, like the proposed project. Geology and soil impacts of this alternative similar to the proposed project, and would be less than significant.

### 7.5.8 Greenhouse Gas Emissions

As described above, during the operational phase of this alternative, it would generate fewer vehicle trips (see Section 7.5.17) and less building energy. Construction activities associated with this alternative would have reduced GHG emissions. Therefore, this alternative would result in a reduction in construction and operational GHG emissions. Thus, impacts would be reduced compared to the proposed project, and would be less than significant.

### 7.5.9 Hazards and Hazardous Materials

The Existing Zoning Alternative would require use of hazardous materials during construction. However, similar to the proposed project, construction materials such as fuels, paints, and solvents would be used in limited quantities and would not pose a significant safety hazard. Additionally, this alternative would disturb the soil on the approximately one-acre site. Therefore, similar to the proposed project, hazards to the public or environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials during construction activities (i.e., historic pesticide use) could still occur and would require mitigation to ensure less than significant impacts. Operations of the industrial use could use more hazardous materials than the proposed residential project. Like the proposed project, compliance with

## 7. Alternatives to the Proposed Project

regulations and guidelines of federal, state, and local agencies for the use, handling, storage, and transport of hazardous materials would be required and would ensure impacts are less than significant. Impacts would be similar to the project, and be less than significant with mitigation incorporated.

### 7.5.10 Hydrology and Water Quality

The Existing Zoning Alternative would implement low-impact development features and provide a treatment/infiltration system that reduces runoff volumes conveyed to the drainage system. Therefore, it is anticipated that this alternative, like the proposed project, would have a beneficial impact on the project site's hydrology and water quality at completion. Similar to the proposed project, implementation of this alternative would comply with the National Pollutant Discharge Elimination System Construction General Permit requirements and implementation of various BMPs to reduce water quality impacts. Therefore, impacts to hydrology and water quality impacts of this alternative would be similar to the proposed project and would be less than significant.

### 7.5.11 Land Use and Planning

The proposed project would require a zone change to Planned Community (PC) zoning. The Existing Zoning Alternative would not require a change to the project site's zoning designation and would be consistent with the adjacent land uses. While no physical impacts to the environment were identified for the project, from placement of a residential use within the buffer area between manufacturing uses and residential uses/Brea Downtown, this alternative was found to reduce impacts since it would not require a zone change. Impacts would be less compared to the proposed project, and would be less than significant.

### 7.5.12 Mineral Resources

The project site is in MRZ-1, where significant mineral deposits are unlikely or not present. Further, no mining sites have been identified on the project site. Under this alternative, impacts would be the same as that identified for the proposed project, and no impacts would occur to mineral resources.

### 7.5.13 Noise

Implementation of this alternative would have the same, approximately one-acre, development footprint as the project site. However, vertical building construction would take longer with the project than under this alternative. Consequently, construction noise impacts would be reduced under this alternative. The operational phase of the Existing Zoning Alternative would generate fewer vehicle trips (see Section 7.5.17) and would slightly reduce operational traffic-related noise impacts. Noise impacts of this alternative would be reduced compared to the project, and would be less than significant.

### 7.5.14 Population and Housing

The Existing Zoning Alternative is anticipated to generate approximately 39 employees at the project site. Similar to the proposed project, this alternative would not displace housing or people as the project site is vacant. Unlike the proposed project, this alternative would not improve the City's jobs-housing balance and

## 7. Alternatives to the Proposed Project

provide workforce housing proximate to Brea Downtown and existing employment. Therefore, this alternative would increase population and housing impacts compared to the proposed project. However, impacts would be less than significant.

### 7.5.15 Public Services

The Existing Zoning Alternative is anticipated to generate approximately 39 employees at the project site. Residential uses generate a higher demand for emergency service calls (e.g., police fire) and school demand than nonresidential land uses. This alternative would be required to pay development impact fees and comply with applicable regulations and standard conditions to ensure that impacts related to public services are less than significant. This alternative is anticipated to generate fewer service calls and would have a reduce demand for public services compared to the proposed project; and impacts would be less than significant.

### 7.5.16 Recreation

Under the Existing Zoning Alternative, no recreational facilities would be provided on the project site. However, residential uses generate a higher demand for recreation in the City. Although this alternative would not provide for onsite recreation, impacts to recreational facilities would be reduced compared to the proposed project, and would be less than significant.

### 7.5.17 Transportation

As shown in Table 7-2, *Existing Zoning Alternative Trip Generation Comparison*, this alternative would generate 545 fewer daily trips, 28 fewer AM peak hour trips, and 39 fewer PM peak hour trips when compared to the proposed project.<sup>3</sup> Additionally, construction-related traffic would be expected to be less than the proposed project due to the reduced square footage of the industrial building compared to the proposed project. Despite the substantial decrease in peak hour traffic generated under this alternative, it is anticipated that the Existing Zoning Alternative would continue to cumulatively contribute to congestion on Imperial Highway, which is a Caltrans facility. However, the direct impact of the project at Berry Street and Imperial Highway would be eliminated. Therefore, while the Existing Zoning Alternative would reduce impacts compared to the proposed project, impacts would remain significant and unavoidable.

**Table 7-2 Existing Zoning Alternative Trip Generation Comparison**

Trip Generation	Daily Trips	AM Peak Hour			PM Peak Hour		
		Enter	Exit	Total	Enter	Exit	Total
Proposed Project	653	11	32	43	32	21	53
Existing Zoning Alternative	108	13	2	15	2	12	14
Project Net Trips	545	-2	30	28	30	9	39

Source: LLG 2019. Traffic modeling for the proposed project is based on a previous site plan with 120 residential units. The updated site plan has 114 units and would generate less average daily vehicle trips than identified in the traffic report.

<sup>3</sup> Traffic modeling is based on a previous site plan with 120 residential units. The updated site plan has 114 units and would generate less vehicle trips than identified in the traffic report.

## 7. Alternatives to the Proposed Project

### 7.5.18 Tribal Cultural Resources

Implementation of this alternative would have the same, approximately one-acre, development footprint as the project site, and could uncover tribal cultural resources during grading activities. Therefore, potential tribal cultural resources impacts would be similar compared to the proposed project, and would be less than significant after mitigation.

### 7.5.19 Utilities and Service Systems

The Existing Zoning Alternative would generate less water, wastewater, and solid waste compared to the proposed project. Utilities and service systems impacts would be reduced compared to the proposed project, and would be less than significant.

### 7.5.20 Wildfire

The project site is an urban area and not in a State Responsibility Area or in or near a wildfire hazard severity zone. Similar to the proposed project, emergency response or evacuation plans would not be impaired, and project occupants would not be exposed to pollution as a result of wildfires. This alternative would comply with the California Fire Code and would not modify slopes in a way that would exacerbate fire risk or increase flooding or landslides. Impacts to wildfires would be similar to the proposed project, and would be less than significant.

### 7.5.21 Conclusion

The Existing Zoning Alternative would lessen environmental impacts in the areas of air quality, energy, GHG emissions, land use and planning, noise, public services, recreation, transportation, tribal cultural resources, and utilities and service systems. This alternative would result in greater environmental impacts to population and housing because it would not improve the City's jobs-housing balance. This alternative would have similar environmental impacts as the proposed project to aesthetics, agriculture and forestry resources, biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, mineral resources, and wildfire.

The Existing Zoning Alternative would develop an industrial building on the project site. Therefore, none of the project objectives would be achieved under this alternative, including increasing the number of housing units in the City, and providing workforce housing within close proximity to Brea Downtown and existing employment.

## 7.6 REDUCED DENSITY ALTERNATIVE

Under this alternative, the project site would be developed based on the maximum density identified in the City of Brea General Plan, which is a density of 50 units/acre. As a result, the Reduced Density Alternative assumes that the approximately one-acre site would be developed with approximately 50 units. Consequently, this alternative would reduce the number of units onsite by approximately 56 percent. Based on 1.81 people

## 7. Alternatives to the Proposed Project

per dwelling unit, the Reduced Density Alternative would result in approximately 91 residents onsite (115 fewer residents than the proposed project).

Like the proposed project, this alternative would require a change a zone change to the Planned Community (PC) zone or alternatively a General Plan Amendment and zone change to Mixed Use. For this analysis, it is assumed that this alternative would be processed similarly as the proposed project and would require a zone change to the PC zone. Therefore, this alternative assumes that the lot coverage associated with this alternative would be similar to the proposed project. However, instead of a five-story structure, this alternative would be two-stories, with one floor of parking. This alternative is assumed to require similar onsite amenities as the proposed project.

### 7.6.1 Aesthetics

Impacts associated with aesthetics include the degradation of scenic vistas, scenic resources, and increased light and glare. Similar to the proposed project, the Reduced Density Alternative would not impact a scenic vista or scenic resources in the City. Impacts associated with the Reduced Density Alternative would be similar to the proposed project, because this alternative would improve the vacant site with development of a residential building with landscaping. However, this alternative would have less massing (two stories instead of five stories) compared to the proposed project. Like the proposed project, this alternative would be required to comply with development standards and design guidelines. Therefore, impacts would be similar to the proposed project, and would be less than significant.

### 7.6.2 50Agriculture and Forestry Resources

The project site has no agricultural uses on it, nor are there agricultural uses within the project vicinity. The project site is located in a highly urbanized area near Brea Downtown and is listed as Urban and Built-up Land by the Division of Land Resource Protection. Impacts of this alternative would be the same as the proposed project; and no impact would occur.

### 7.6.3 Air Quality

The Reduced Density Alternative would reduce air quality impacts during construction and operational phases. Development of a smaller two-story structure with only one parking level, would require less grading. However, it is anticipated that peak construction emissions would be the same as the project. In addition, the alternative would require slightly less time for vertical building construction. During the operational phase, this alternative would generate approximately 56 percent fewer vehicle trips (see Section 7.6.17) and approximately 56 percent less building energy. Consequently, this alternative would reduce long-term operational air quality impacts of the project. However, the proposed project's construction and operational activities would not exceed SCAQMD's thresholds. This alternative would reduce the air quality impacts, and impacts would be less than significant.

## 7. Alternatives to the Proposed Project

### 7.6.4 Biological Resources

The Reduced Density Alternative would result in similar impacts to biological resources as the proposed project. As with the proposed project, this alternative would require removal of all vegetation on the approximately one-acre site. Similar to the proposed project, this alternative would also require compliance with the California Fish and Game Code and would not have significant impacts to nesting birds. Impacts under this alternative would be the same as the proposed project, and would be less than significant.

### 7.6.5 Cultural and Paleontological Resources

Implementation of the Reduced Density Alternative would have the same, approximately one-acre, development footprint as the project site, and could uncover cultural resources during grading activities. Both this alternative and the proposed project would require mitigation in the event cultural resources are uncovered during grading. Thus, impacts would be the same as the proposed project, and would be less than significant upon implementation of mitigation measures.

### 7.6.6 Energy

This alternative would result in an approximately 56 percent decrease in building energy use. However, energy use on a per capita basis would be the same as the proposed project. As described above, during the operational phase of this alternative, it would generate fewer vehicle trips (see Section 7.6.17). Construction activities associated with this alternative would have slightly reduced energy demands associated with a shorter duration. Impacts would be reduced compared to the proposed project, and would be less than significant.

### 7.6.7 Geology and Soils

This alternative would be required to comply with building and seismic codes and regulations, like the proposed project. Geology and soil impacts of this alternative similar to the proposed project, and would be less than significant.

### 7.6.8 Greenhouse Gas Emissions

As described above, during the operational phase of this alternative, it would generate fewer vehicle trips (see Section 7.6.17) and less building energy. Construction activities associated with this alternative would also have reduced GHG emissions. Therefore, this alternative would result in a reduction in construction and operational GHG emissions. Thus, impacts would be reduced compared to the proposed project, and would be less than significant.

### 7.6.9 Hazards and Hazardous Materials

The Reduced Density Alternative would require use of hazardous materials during construction. However, similar to the proposed project, construction materials such as fuels, paints, and solvents would be used in limited quantities and would not pose a significant safety hazard. Additionally, this alternative would disturb



## 7. Alternatives to the Proposed Project

the soil on the approximately one-acre site. Therefore, similar to the proposed project, hazards to the public or environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials during construction activities (i.e., historic pesticide use) could still occur and would require mitigation to ensure less than significant impacts. Like the proposed project, compliance with regulations and guidelines of federal, state, and local agencies for the use, handling, storage, and transport of hazardous materials would be required and would ensure impacts are less than significant. Impacts would be similar to the project, and be less than significant with mitigation incorporated.

### 7.6.10 Hydrology and Water Quality

The Reduced Density Alternative would implement low-impact development features and provide a treatment/infiltration system that reduces runoff volumes conveyed to the drainage system. Therefore, it is anticipated that this alternative, like the proposed project, would have a beneficial impact on the project site's hydrology and water quality at completion. Similar to the proposed project, implementation of this alternative would comply with the National Pollutant Discharge Elimination System Construction General Permit requirements and implementation of various BMPs to reduce water quality impacts. Therefore, impacts to hydrology and water quality impacts of this alternative would be similar to the proposed project and would be less than significant.

### 7.6.11 Land Use and Planning

Like the proposed project, the Reduced Density Alternative would require a zone change to Planned Community (PC) zoning and would place residential uses on the eastern edge of the City's industrial community. This alternative would require the same condition of approval to disclose the potential elevated noise levels issues associated with living adjacent to businesses that may operate in the early morning hours when people are more sensitive to noise. Thus, impacts would be similar to the proposed project, and like the proposed project, would be less than significant.

### 7.6.12 Mineral Resources

The project site is in MRZ-1, where significant mineral deposits are unlikely or not present. Further, no mining sites have been identified on the project site. Under this alternative, impacts would be the same as that identified for the proposed project, and no impacts would occur to mineral resources.

### 7.6.13 Noise

Implementation of the Reduced Density Alternative would have the same, approximately one-acre, development footprint as the project site. In addition, vertical building construction would take longer with the project than under this alternative. Consequently, construction noise impacts would be slightly reduced under this alternative. The operational phase of the Reduced Density Alternative would generate fewer vehicle trips (see Section 7.6.17) and would slightly reduce operational traffic-related noise impacts. Noise impacts of this alternative would be reduced compared to the project, and would be less than significant.

## 7. Alternatives to the Proposed Project

### 7.6.14 Population and Housing

Similar to the proposed project, the Reduced Density Alternative would not displace housing or people. Under this alternative, 91 residents would be introduced to the project site—115 fewer people, or 56 percent of the proposed project. This alternative would improve the City’s jobs-housing balance, albeit to a lesser degree than the proposed project. Therefore, this alternative would slightly increase impacts compared to the proposed project, and impacts would be less than significant.

### 7.6.15 Public Services

The Reduced Density Alternative is anticipated to have a lower demand for emergency service calls (e.g., police fire) and school demand compared to the proposed project since this alternative results in a reduction in the number of residents onsite by approximately 56 percent. This alternative would be required to pay development impact fees and comply with applicable regulations and standard conditions to ensure that impacts related to public services are less than significant. This alternative is anticipated to generate fewer service calls and would have a reduced demand for public services compared to the proposed project; impacts would be less than significant.

### 7.6.16 Recreation

The Reduced Density Alternative would result in an increase in demand for recreation in the City. Similar to the proposed project, this alternative would include recreational facilities onsite, which would reduce potential impacts to existing neighborhood and regional parks and recreational facilities. Therefore, impacts to recreation would be similar to the proposed project, and less than significant.

### 7.6.17 Transportation

As shown in Table 7-3, *Reduced Density Alternative Trip Generation Comparison*, this alternative would generate 381 fewer daily trips, 25 fewer AM peak hour trips, and 31 fewer PM peak hour trips than the proposed project.<sup>4</sup> Additionally, construction-related traffic would be expected to be less than the proposed project due to the reduced square footage, as a result of the reduction in density compared to the proposed project. Despite the substantial decrease in peak hour traffic generated under this alternative, it is anticipated that the Existing Zoning Alternative would continue to cumulatively contribute to congestion on Imperial Highway, which is a Caltrans facility. However, it is likely the direct impact at Berry Street and Imperial Highway would be eliminated. Therefore, while the Reduced Density Alternative would reduce impacts compared to the proposed project, impacts would remain significant and unavoidable.

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<sup>4</sup> Traffic modeling is based on a previous site plan with 120 residential units. The updated site plan has 114 units and would generate less vehicle trips than identified in the traffic report.

## 7. Alternatives to the Proposed Project

**Table 7-3 Reduced Density Alternative Trip Generation Comparison**

Trip Generation	Daily Trips	AM Peak Hour			PM Peak Hour		
		Enter	Exit	Total	Enter	Exit	Total
Proposed Project	653	11	32	43	32	21	53
Reduced Density Alternative	272	3	13	18	13	0	22
Project Net Trips	381	8	19	25	19	21	31

Source: LLG 2019. Traffic modeling is based on a previous site plan with 120 residential units. The updated site plan has 114 units and would generate less vehicle trips than identified in the traffic report.

### 7.6.18 Tribal Cultural Resources

Implementation of the Reduced Density Alternative would have the same, approximately one-acre, development footprint as the project site, and could uncover tribal cultural resources during grading activities. Therefore, potential tribal cultural resources impacts would be the same as the proposed project, and would be less than significant after mitigation.

### 7.6.19 Utilities and Service Systems

The Reduced Density Alternative would generate less wastewater, consume less water, and generate less solid waste than the proposed project. Utilities and service systems impacts would be reduced compared to the proposed project, and would be less than significant.

### 7.6.20 Wildfire

The project site is an urban area and not in a State Responsibility Area or in or near a wildfire hazard severity zone. Similar to the proposed project, emergency response or evacuation plans would not be impaired, and project occupants would not be exposed to pollution as a result of wildfires. This alternative would comply with the California Fire Code and would not modify slopes in a way that would exacerbate fire risk or increase flooding or landslides. Impacts to wildfires would be similar to the proposed project, and would be less than significant.

### 7.6.21 Conclusion

The Reduced Density Alternative would lessen environmental impacts in the areas of air quality, energy, greenhouse gas emissions, noise, public services, transportation, and utilities and service systems. This alternative would result in similar environmental impacts as the proposed project to aesthetics, agriculture and forestry resources, biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, recreation, tribal cultural resources, and wildfire. This alternative would result in greater impacts to population and housing.

The Reduced Zoning Alternative would develop 50 units on the project site instead of 114 units. The project objectives would be achieved under this alternative; however, this alternative lessens the project benefits since a reduction in density would not provide substantial housing units in the City nor provide substantial housing units to accommodate the workforce population.

## 7. Alternatives to the Proposed Project

### 7.7 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires a lead agency to identify the “environmentally superior alternative” and, in cases where the “No Project” Alternative is environmentally superior to the proposed project, the environmentally superior development alternative must be identified. One alternative has been identified as “environmentally superior” to the proposed project:

- Reduced Density Alternative

The Reduced Density Alternative has been identified as the environmentally superior alternative. As shown in Table 7-4, *Summary of Impacts of Alternatives Compared to the Proposed Project*, this alternative lessens impacts associated with air quality, energy, GHG emissions, noise, public services, transportation, and utilities and service systems, while achieving the benefits of the project objectives.

**Table 7-4 Summary of Impacts of Alternatives Compared to the Proposed Project**

Topic	Proposed Project	No Project/No Development Alternative	Existing Zoning Alternative	Reduced Density Alternative
Aesthetics	LTS	+	=	=
Agricultural & Forestry Resources		=	=	=
Air Quality	LTS	–	–	–
Biological Resources	LTS	–	=	=
Cultural Resources	LTS/M	–	=	=
Energy	LTS	–	–	–
Geology and Soils	LTS	–	=	=
Greenhouse Gas Emissions	LTS	–	–	–
Hazards and Hazardous Materials	LTS/M	–	=	=
Hydrology and Water Quality	LTS	+	=	=
Land Use and Planning	LTS	–	–	=
Mineral Resources		=	=	=
Noise	LTS	–	–	–
Population and Housing	LTS	+	+	+
Public Services	LTS	–	–	–
Recreation	LTS	–	–	=
Transportation and Traffic Project Impact	S/U	*	*	*
Cumulative Impact		*	–	–
Tribal Cultural Resources	LTS/M	–	–	=
Utilities and Service Systems	LTS	–	–	–
Wildfire	LTS	–	=	=

Notes: LTS = Less than Significant; LTS/M = Less than Significant with Mitigation Incorporated; S/U = Significant and Unavoidable

(\*) The alternative would eliminate an impact of the proposed project and impacts would be substantially reduced

(–) The alternative would result in less of an impact than the proposed project.

(+) The alternative would result in greater impacts than the proposed project.

(=) The alternative would result in the same/similar impacts as the proposed project.

## 7. Alternatives to the Proposed Project

**Table 7-5 Ability of Each Alternative to Meet the Project Objectives**

Objective	Proposed Project	No Project/No Development Alternative	Existing Zoning Alternative	Reduced Density Alternative
1. Provide contemporary housing solutions for Brea's workforce population consistent with Brea Envisions.	Yes	No	No	Yes
2. Provide housing choices affordable to Brea's workforce population, consistent with the City's goals in the Housing Element to provide for a variety of housing types.	Yes	No	No	Yes
3. Develop housing proximate to Brea Downtown that can take advantage of the western access to the Rails to Trails as well as the Mercury Lane Bridge.	Yes	No	No	Yes
4. Provide additional opportunities for residential growth on infill parcels.	Yes	No	No	Yes
5. To improve the jobs-housing balance in the City of Brea and to provide new housing within close proximity to jobs and services.	Yes	No	No	Yes, but to a lesser extent
6. Promote healthy living and physical activity by providing recreational amenities onsite and areas for secured bicycle storage to provide opportunities to utilize the alternative transportation options available proximate to the site.	Yes	No	No	Yes

## 7.8 REFERENCES

Linscott, Law, and Greenspan (LLG) Engineers. 2019, April 10. Revised Traffic Impact Analysis Report Mercury Apartments.

Southern California Association of Governments (SCAG). 2001, October 31. Employment Density Study Summary Report. Prepared by the Natelson Company, Inc., in association with Terry A. Hayes Associates.

US Census Bureau (US Census). 2014. Selected Economic Characteristics. 2010-2014 American Community Survey 5-Year Estimates.  
[http://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS\\_14\\_5YR\\_DP03&prodType=table](http://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_14_5YR_DP03&prodType=table).

## 7. Alternatives to the Proposed Project

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