

# 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 sec. 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])
- “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])

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- “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 3.2, 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. Organize the land plan to facilitate the provision of proposed land uses and amenities.
2. Integrate a comprehensive walking and biking trail system that provides physical and visual connections to enhance walkability, linking neighborhoods to key amenities and open space areas within Brea 265 and to the existing trails in the greater Brea community, including Brea Sports Park, Carbon Canyon Regional Park, and Chino Hills State Park.
3. Enhance public benefits by incorporating a variety of parks, paseos, parkways, and open space features that meet the recreational needs of the residents, enhance pedestrian orientation, and contribute to community aesthetics.
4. Provide a housing mix ranging from conventional single-family homes and detached cluster homes to townhomes and apartments, including workforce and affordable housing units.
5. Incorporate development standards specifically crafted for the latest residential design concepts and neighborhood designs that are popular with homebuyers.
6. Provide flexibility in plan implementation to allow for changes in future market conditions.
7. Use the Specific Plan as a tool to implement the City’s affordable housing requirements and the State’s Density Bonus Law.
8. Establish a distinctive community character through place-making elements that embrace and respect the site’s oil industry history and special physical attributes.

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9. Incorporate sustainable design and development approaches, including walkable communities, water quality features, and water- and energy-efficient landscape and building design. Encourage the use of sustainable building materials, where feasible.
10. Ensure appropriate phasing and financing for community facilities, including circulation and streetscape improvements; water, sewer, and drainage facilities; and parks and recreational facilities.
11. Provide the fire management plan to reduce the threat of wildfire and create a fire-resistant buffer between homes and the adjacent open space areas of Carbon Canyon Regional Park.

### 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 Reduced Density Alternatives

Until January 1, 2025, SB 330 prohibits a county or city (including through local initiative or referendum power) from enacting a development policy, standard, or condition, that would have the effect of changing the land use designation or zoning of a parcel or parcels of property to a less intensive use or reducing the intensity of land use within an existing zoning district below what was allowed under the general plan or specific plan land use designation and zoning ordinances of the county or city in effect on January 1, 2018.

Additionally, Public Resources Code Section 21159.26. states:

With respect to a project that includes a housing development, a public agency may not reduce the proposed number of housing units as a mitigation measure or *project alternative* for a particular significant effect on the environment if it determines that there is another feasible specific mitigation measure or project alternative that would provide a comparable level of mitigation. This section does not affect any other requirement regarding the residential density of that project. [emphasis added]

Of the 262.1-acre project site, approximately 219.1 acres is in unincorporated Orange County. Under the existing Orange County Transportation Analysis Model (OCTAM) based on the County of Orange General Plan land use designations for the project site, up to 615 units could be developed on the project site. Therefore, a reduced density alternative that proposes less than 615 units would not comply with SB 330 and therefore was considered and rejected.

#### 7.2.2 Alternative Site

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

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sec. 15126.6[f][2][a]). Key factors in evaluating the feasibility of potential offsite locations for EIR project alternatives include: 1) site suitability; 2) economic viability; 3) availability of infrastructure; 4) general plan consistency; 4) other plans or regulatory limitations; 5) jurisdictional boundaries (projects with a regionally significant impact should consider the regional context); and 6) 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 sec. 15126.6[f][1]).

In general, any development of the size and type proposed by the project would have substantially the same impacts on air quality, greenhouse gases, energy, land use/planning, noise, population/housing, public services, recreation, transportation, and utilities/service systems. Without a site-specific analysis, impacts on aesthetics, agricultural resources, biological resources, cultural resources, geology/soils, hazards and hazardous materials, hydrology/water quality, mineral resources, tribal cultural resources, and wildfire cannot be evaluated.

In reviewing possible alternative sites, the project applicant does own approximately 321 acres of vacant land in Orange County near the intersection of Tonner Canyon Road and Brea Boulevard/Brea Canyon Road. This alternative site is in unincorporated Orange County but is within the City of Brea's sphere of influence. The County of Orange General Plan designates this site as "1B" Suburban Residential, and it is currently zoned A-1 "O" General Agricultural District/Oil Production District. Similar to the proposed project, the alternative site could be rezoned to permit the construction of up to 1,100 residential units. Also similar to the proposed project, the alternative site is currently used for oil production. However, the alternative site has more substantial topography and is more visible because of its higher elevations. The proposed project was found to have a less than significant impact without mitigation measures to the following environmental topics: aesthetics, agricultural and forestry resources, energy, land use and planning, mineral resources, operational noise, population and housing, recreation, and transportation. The proposed project was found less than significant with mitigation to the following environmental topics: construction air quality, biological resources, cultural resources, geology and soils (paleontological resources), hazards and hazardous materials, hydrology and water quality, construction noise, public services, tribal cultural resources, utilities and service systems, and wildfire. The proposed project was found to result in significant and unavoidable impacts to operational air quality and greenhouse gas (GHG) emissions. Development of similar size and number of units in the city would likely result in similar environmental impacts as the proposed project, including significant operational air quality and GHG emissions impacts. Therefore, development of the alternative site would not avoid or substantially lessen the effects of the proposed project and is therefore rejected from further consideration.

### 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/Existing County of Orange General Plan Development Alternative
- No Project/Existing City of Brea General Plan Development Alternative
- Higher Density Development Alternative

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CEQA requires the alternatives analysis to include a No Project Alternative in order to allow decision makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project (CEQA Guidelines sec. 15126.6[e][1]). According to CEQA Guidelines Section 15126.6(e)(2), the No Project Alternative “shall discuss the existing conditions at the time the notice of preparation is published...as well as what would reasonably be expected to occur in the foreseeable future if the proposed project were not approved, based on current plans, and consistent with available infrastructure and community services.” This chapter analyzes in detail two No Project alternatives.

An EIR must identify an “environmentally superior” alternative, and where the No Project Alternative is identified as environmentally superior, the EIR is 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. However, only the impacts found significant and unavoidable are used in making the final determination of whether an alternative is environmentally superior or inferior to the proposed project. The proposed project was found to have a less than significant impact without mitigation measures to the following environmental topics: aesthetics, agricultural and forestry resources, energy, geology and soils (except for paleontological resources), land use and planning, mineral resources, operational noise, population and housing, recreation, and transportation. The proposed project was found less than significant with mitigation to the following environmental topics: construction air quality, biological resources, cultural resources, geology and soils (paleontological resources), hazards and hazardous materials, hydrology and water quality, construction noise, public services, tribal cultural resources, utilities and service systems, and wildfire. The proposed project was found to result in significant and unavoidable impacts to operational air quality and GHG emissions. Section 7.7 identifies the Environmentally Superior Alternative. The preferred land use alternative (proposed project) is analyzed in detail in Chapter 5 of this DEIR.

### 7.3.1 Alternatives Comparison

The following statistical analysis provides a summary of general socioeconomic buildout projections determined by the three 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 identifies citywide information regarding dwelling unit, population, and employment projections and provides the jobs-to-housing ratio for each of the alternatives.

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**Table 7-1 Buildout Statistical Summary**

	Proposed Project	No Project/Existing County of Orange General Plan Development Alternative	No Project/Existing City of Brea General Plan Development Alternative	Higher Density Development Alternative
Dwelling Units	1,100	615	727	1,100
Density	4.2 DU/ac	2.3 DU/ac	2.8 DU/ac	6.8 DU/ac
Population	3,102	1,735	2,050	3,102
Employment	0	0	0	0
Jobs-to-Housing Ratio	2.80	2.88	2.86	2.80

### 7.4 NO PROJECT/EXISTING COUNTY OF ORANGE GENERAL PLAN DEVELOPMENT ALTERNATIVE

Under this alternative, a total of 615 single-family detached units would be developed onsite. The 615 detached single-family units are from the Orange County Transportation Analysis Model (OCTAM) based on the County of Orange General Plan land use designations for the project site. Approximately 16.4 percent (43 acres) of the project site is in the City of Brea, and the remaining 83.6 percent (219.1 acres) is in unincorporated Orange County. Therefore, this alternative assumes that approximately 16.4 percent or 101 units of the 615 single family units would be constructed in the City of Brea, and 514 units would be constructed in unincorporated Orange County. This alternative would generate 5,800 daily trips, reducing the project-related trips from 9,351 trips under the proposed project—a reduction of 3,551 trips or approximately 38 percent. Under this alternative, no attached single-family units or townhome units would be constructed, and 11 affordable housing units would be constructed per the City’s Affordable Housing Ordinance, a reduction from the proposed 76 affordable housing units under the proposed project. Under this alternative, the overall development density would be reduced from approximately 4.2 units per acre to 2.3 units per acre. Though more open space area could be provided, no sports park would be developed. Under this alternative, discretionary actions involving Specific Plan, general plan amendment, rezoning, development agreement, and annexation would not be required.

#### 7.4.1 Aesthetics

This alternative results in development of 615 single-family detached units, 485 dwelling units fewer than the proposed 1,100 housing mix ranging from single family homes and detached cluster homes to townhomes and apartments, including affordable housing units. This represents a 44 percent decrease in dwelling units compared to the proposed project. This decrease in dwelling units would allow this alternative to dedicate more land to open space. This alternative would be expected to comply with all applicable design and development regulations and guidelines of the County of Orange and the City of Brea, without modifications allowed by the proposed project under the affordable housing incentives. Therefore, the maximum building height is not expected to exceed 35 feet, instead of 50 feet under the proposed project, and would also have greater front and side setbacks. Compared to the proposed project, this alternative would be less dense with less mass and height. Therefore, it is anticipated that there would be more opportunities for visual relief. This alternative

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would have less aesthetic impacts compared to the proposed project. Aesthetics is not a significant and unavoidable impact of the proposed project.

### 7.4.2 Agriculture and Forestry Resources

As with the proposed project, development under this alternative would remove the existing agricultural uses on site. Impacts of the proposed project on agricultural and forestry resources were found to be less than significant prior to mitigation. This alternative's impact to agriculture and forestry resources would be similar to the proposed project. Agriculture and forestry resources are not a significant and unavoidable impact of the proposed project.

### 7.4.3 Air Quality

This alternative would result in a decrease of 485 dwelling units compared to the proposed 1,100 units under the proposed project for a total of 615 dwelling units. This alternative's dwelling units could be arranged in a manner that decreases the amount of grading required. In addition, the decrease in the amount of dwelling units would also reduce the amount of construction needed. Both the reduced grading and construction would reduce construction-related air quality impacts compared to the proposed project. A reduction in the number of units would result in less operation-related regional emissions, including transportation, area, and energy source emissions. During operation, this alternative would be expected to generate approximately 5,800 daily trips, which represents an approximately 38 percent reduction compared to the proposed project. This alternative would therefore result in a decrease in short-term construction impacts and long-term operational air quality impacts compared to the proposed project. However, the reduction in units would not be substantial enough to eliminate significant operational air quality impacts. Construction air quality is not a significant and unavoidable impact of the proposed project, but operational air quality is a significant and unavoidable impact of the proposed project.

### 7.4.4 Biological Resources

The project site contains sensitive flora, fauna, and habitat. The project site contains four drainages (jurisdictional waters) and riparian areas. In addition, the project site is in an area identified as critical habitat for the coastal California gnatcatcher. Similar to the proposed project, development of this alternative would develop the project site and would result in impacts to existing biological resources on site, and require similar permits and mitigation measures as the proposed project. However, development under this alternative could preserve a larger open space area compared to the proposed project due to less dense development, providing more opportunities to preserve sensitive vegetation and habitats onsite rather than providing offsite mitigation. Therefore, this alternative would slightly reduce impacts related to biological resources. Biological resources are not a significant and unavoidable impact of the proposed project.

### 7.4.5 Cultural Resources

This alternative would redevelop and disturb a smaller area of the project site compared to the proposed project. Therefore, the area of soil disturbance would be smaller than that of the proposed project. However,

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similar to the proposed project, a mitigation measure that requires monitoring during certain grading activities would still be necessary. Compared to the proposed project, this alternative would reduce impacts to cultural resources because of the smaller development area. Cultural resources are not a significant and unavoidable impact of the proposed project.

### 7.4.6 Energy

Under this alternative, the number of residential units would be reduced to 615 dwelling units from the proposed 1,100 units. This alternative is anticipated to result in a reduction in energy impacts compared to the proposed project. Energy is not a significant and unavoidable impact of the proposed project.

### 7.4.7 Geology and Soils

This alternative would redevelop and disturb a smaller portion of the project site compared to the proposed project. This alternative is expected to preserve more of the natural slopes on site. However, as with the proposed project, new buildings and graded areas would be required to comply with the most recent building and seismic codes and regulations. Because this alternative would reduce the number of units to be constructed and areas to be graded, this alternative would reduce impacts related to geology and soils. Geology and soils are not a significant and unavoidable impact of the proposed project.

This alternative would reduce the area to be graded and excavated, although it would require a similar mitigation measure to reduce potential paleontological resources impacts by requiring monitoring during ground-disturbing activities that occur in deposits that could potentially contain paleontological resources. Because the area of disturbance would be reduced, the potential for discovering and damaging paleontological resources would also be reduced. Paleontological resources is not a significant and unavoidable impact of the proposed project.

### 7.4.8 Greenhouse Gas Emissions

This alternative would contribute to global climate change through direct emissions of GHG from onsite area sources and vehicle trips generated. However, a decrease in the number of units and building area would likely result in reduced construction-related trips. During long-term operation, vehicle trips, VMT, area sources, and off-site energy production would be reduced when compared to the proposed project. GHG emissions impacts of this alternative would be less than the proposed project. However, the reduction in units would not be substantial enough to eliminate significant GHG emissions impacts. GHG emissions are a significant and unavoidable impact of the proposed project.

### 7.4.9 Hazards and Hazardous Materials

The project site has historically contained and currently contains oil production activities and agriculture activities. All hazardous material concerns and remediation programs under this alternative would be identical to those encountered under the proposed project. As a result, impacts related to hazards and hazardous materials would be the same as the proposed project. Hazards and hazardous materials is not a significant and unavoidable impact of the proposed project.

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### 7.4.10 Hydrology and Water Quality

This alternative would redevelop and disturb a smaller portion of the project site and preserve more land as open space. Therefore, the area of soil disturbance would be smaller than the proposed project, and hydrology and water quality impacts during construction would be less than the proposed project. And as with the proposed project, this alternative would be required to be graded in accordance with the NPDES Construction General Permit requirements and incorporate appropriate best management practices. Additionally, full buildout of this alternative would result in more pervious surfaces, since a larger portion of the project site would be maintained as open space. The increase in pervious surfaces would allow more rainwater to percolate into the ground. This alternative would reduce impacts related to hydrology and water quality compared to the proposed project. Nevertheless, similar to the proposed project, this alternative would likely result in housing development in the Carbon Canyon Dam inundation area and would require the preparation and submittal of an emergency response plan to the Brea Fire Services Department. Hydrology and water quality is not a significant and unavoidable impact of the proposed project.

### 7.4.11 Land Use and Planning

Under this alternative, discretionary actions involving Specific Plan, rezoning, and affordable housing incentives would not be required. This alternative would be consistent with the existing zoning and land use designation for the project site. This alternative would also reduce project-related trips by approximately 38 percent, reducing potential impacts to local and regional transportation systems, including Caltrans facilities. Therefore, this alternative would serve better to attain the RTP/SCS goal of preserving and ensuring a sustainable regional transportation system than the proposed project, which requires changes in land use designations. This alternative would reduce impacts related to land use and planning compared to the proposed project. Land use and planning is not a significant and unavoidable impact of the proposed project.

### 7.4.12 Mineral Resources

The project site is in a Mineral Resource Zone (MRZ) 1 and MRZ 3. Development under this alternative would result in similar impacts to mineral resources as the proposed project. Similar to the proposed project, development of this alternative would not deplete or modify the availability of a known mineral resources. This alternative would have similar physical environmental impacts to mineral resources compared to the proposed project. Mineral resources is not a significant and unavoidable impact for the proposed project.

### 7.4.13 Noise

A reduction in building area would decrease the project-related construction noise impacts. This alternative would still be anticipated to implement the identified mitigation measures to ensure that construction-related noise levels are less than significant. However, the construction duration would be shortened, and the related construction noise would be reduced. The reduction in number of units would also decrease residential noise and traffic noise, thus reducing the operational noise impact compared to the proposed project. Noise related to the sports park would also be eliminated. This alternative would reduce impacts related to both construction and operational noise. Noise is not a significant and unavoidable impact of the proposed project.

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### 7.4.14 Population and Housing

As shown in Table 7-1, the buildout of this alternative would result in 615 dwelling units, which would be expected to generate 1,735 new residents. Compared to the proposed project, this alternative results in 485 fewer dwelling units and 1,367 fewer residents than the proposed project (a 44 percent decrease for both). In addition, the jobs-to-housing ratio for this alternative would be 2.88 compared to the project's 2.80. Under this alternative, no affordable housing units would be constructed. The reduction of housing opportunities compared to the proposed project would worsen the jobs-to-housing ratio. Therefore, this alternative would have greater population and housing impacts compared to the proposed project. Population and housing impact is not a significant and unavoidable impact of the proposed project.

### 7.4.15 Public Services

This alternative would reduce the number of units developed on the project site, and therefore would generate less public services demands compared to the proposed project. However, the proposed project would provide special funding to improve fire safety facilities and training and would also provide locations for future fire safety and public safety/civic uses, as stipulated in the Development Agreement. Under this alternative, no additional special public safety facilities and sites would be provided to reduce fire service impacts to a less than significant level. Therefore, this alternative would result in greater fire services impact than the proposed project. Similar to the proposed project, a mitigation measure that requires Crime Prevention Through Environmental Design principles to reduce police services impact and a mitigation measure to offset its fair-share of the costs of providing additional library resources would still be necessary for this alternative. This alternative would decrease impacts related to police, school, and library services, and increase fire protection impacts. Public services are not a significant and unavoidable impact of the proposed project.

### 7.4.16 Recreation

This alternative would reduce the number of units developed on the project site, and therefore would reduce the number of residents at the project site. Similar to the proposed project, this alternative would be required to comply with Brea Municipal Code section 18.64.080, which requires the provision of park and recreational facilities through land dedication, installation of improvements, payment of in-lieu fee thereof, or a combination. Given the reduction of dwelling units on-site and residents, this alternative would generate a reduced park and recreational demand compared to the proposed project. However, the 13-acre sports park with various recreational amenities would not be provided under this alternative. Therefore, this alternative would have similar environmental impacts on recreation as the proposed project. Recreation is not a significant and unavoidable impact of the proposed project.

### 7.4.17 Transportation

Under this alternative, construction-related traffic would be reduced since there would be a reduction in residential units. This alternative would also reduce operation-related trips, generating 5,800 daily trips instead of 9,351 trips under the proposed project—a reduction of approximately 38 percent. Therefore, this alternative would reduce roadway intersection and segment queuing impacts on local and Caltrans facilities. And as with

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the proposed project, with reduced daily trips but within the same traffic analysis zones, this alternative is anticipated to result in VMT per service population that is less than the City's threshold. Because this alternative would decrease daily and peak hour trips in area roadway system, this alternative would have less traffic impacts in comparison with the proposed project. However, as with the proposed project, this alternative would also be required to contribute its fair share pursuant to the City's AB 1600 Transportation Improvement Nexus Program (Ordinance 996). This alternative would reduce impacts related to transportation compared to the proposed project. Transportation impacts are not a significant and unavoidable impacts of the proposed project.

### 7.4.18 Tribal Cultural Resources

This alternative would develop a smaller portion of the project site compared to the proposed project and provide more open space. As such, development under this alternative would require less earthwork and ground-disturbing activities. Due to the earthwork activities, potential impacts still exist to subsurface tribal cultural resources. Similar to the proposed project, this alternative would need a mitigation measure requiring the retention of a qualified Native American monitor during construction. Given the smaller number of dwelling units, this alternative would reduce impacts relating to tribal cultural resources compared to the proposed project. Tribal cultural resources are not a significant and unavoidable impact of the proposed project.

### 7.4.19 Utilities and Service Systems

This alternative would have 485 fewer dwelling units than the proposed project. Therefore, the alternative would generate less wastewater and solid waste and less demand for water, electricity, gas, and telecommunication compared to the proposed project. Given the smaller number of dwelling units, this alternative would have more impervious surfaces and is therefore likely to result in reduced stormwater volume compared to the proposed project. This alternative would reduce overall utilities and service systems demands compared to the proposed project. Utilities and service systems are not a significant and unavoidable impact of the proposed project.

### 7.4.20 Wildfire

The project site is in a very high fire hazard severity zone (FHSZ) for incorporated local responsibility area (LRA) of the City of Brea and the Orange County Fire Authority's (OCFA) unincorporated LRA. This alternative would place 615 dwelling units on-site instead of 1,100 units. As with the proposed project, development under this alternative would be required to comply with the California Fire Code (CFC), and the City of Brea's and OCFA's standards for fire protection, including providing fuel modification zones and implementing noncombustible construction and plants and landscaping. This alternative would provide more opportunities for open space, which could be prone to wildfire risks, compared to more dense development with more impervious and nonflammable surfaces. Therefore, this alternative would have greater impacts related to wildfire. Wildfire is not a significant and unavoidable impact of the proposed project.

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### 7.4.21 Conclusion

This alternative would lessen environmental impacts for Aesthetics, Air Quality, Biological Resources, Cultural Resources, Energy, Geology and Soils, GHG Emissions, Hydrology and Water Quality, Land Use and Planning, Noise, Public Services, Transportation, Tribal Cultural Resources, and Utilities and Service Systems. This alternative would be environmentally neutral for Agriculture and Forestry Resources, Hazards and Hazardous Materials, Mineral Resources, and Recreation. This alternative would worsen environmental impacts for Population and Housing and Wildfire. All mitigation measures identified for the proposed project would still be required. For these reasons, this alternative is considered environmentally superior to the proposed project.

## 7.5 NO PROJECT/EXISTING CITY OF BREA GENERAL PLAN DEVELOPMENT ALTERNATIVE

Under this alternative, the project site would be developed under the existing Hillside Residential and Low Density Residential land use designations. Pursuant to the General Plan's slope density formula and Brea Municipal Code Section 20.206.060 and Table 20.206.060.B for Hillside Residential, 160 dwelling units are allowed in the 166.2 acres of Hillside Residential designation, a density of 0.96 dwelling unit per acre. And the Low Density Residential land use designation allows a maximum overall density of 6 dwelling units per acre, resulting in a total of 567 units in the 94.5-acre portion of the project site. This alternative does not include the density increase allowed under Section 20.206.060.C.3 or the state density bonus. This alternative would have an overall average density of 2.8 dwelling units per acre. Therefore, under the City's General Plan land use designation, a total of 727 single family detached units would be allowed. This alternative would include 10 percent affordable housing units under the City's affordable housing ordinance, and therefore include 73 affordable housing units. Under this alternative, more open space area would be preserved. However, no sports park would be developed. This alternative would generate approximately 6,856 daily trips, reducing the project-related 9,351 trips by 2,495 trips or approximately 26.7 percent. Under this alternative, discretionary actions involving precise development review, a hillside development permit, and annexation would be required.

### 7.5.1 Aesthetics

This alternative results in development of 727 single-family detached units, 373 dwelling units fewer than the proposed 1,100 housing mix ranging from single family homes and detached cluster homes to townhomes and apartments, including affordable housing units. This represents a 34 percent decrease in dwelling units compared to the proposed project. This decrease in dwelling units and compliance with the Hillside Residential ordinance would preserve more land as open space. This alternative would be expected to comply with all applicable design and development regulations and guidelines in the City's Municipal Code and General Plan. Therefore, the maximum building height is not expected to exceed 35 feet, instead of 50 feet under the proposed project, and would also have greater front and side setbacks. Compared to the proposed project, this alternative would be less dense with less mass and height. Therefore, it is anticipated that there would be more opportunities for visual relief. This alternative would have less aesthetic impacts compared to the proposed project. Aesthetics is not a significant and unavoidable impact of the proposed project.

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### 7.5.2 Agriculture and Forestry Resources

As with the proposed project, development under this alternative would remove the existing agricultural uses on-site. Impacts of the proposed project on agricultural and forestry resources were found to be less than significant prior to mitigation. This alternative's impact to agriculture and forestry resources would be similar to the proposed project. Agriculture and forestry resources are not a significant and unavoidable impact of the proposed project.

### 7.5.3 Air Quality

This alternative would result in a decrease of 373 dwelling units compared to the proposed project, for a total of 727 dwelling units. This alternative's dwelling units could be arranged in a manner that decreases the amount of grading required. In addition, the decrease in the number of dwelling units would also reduce the amount of construction needed. Both the reduced grading and construction would reduce construction-related air quality impacts compared to the proposed project. During operation, this alternative would be expected to generate approximately 6,863 daily trips, which represents an approximately 26.5 percent reduction compared to the proposed project. This alternative would therefore result in a decrease in short-term construction impacts and long-term operational air quality impacts compared to the proposed project. However, the reduction in units would not be substantial enough to eliminate significant operational air quality impacts. Construction air quality is not a significant and unavoidable impact of the proposed project, but operational air quality is a significant and unavoidable impact of the proposed project.

### 7.5.4 Biological Resources

The project site contains sensitive flora, fauna, and habitat. The project site contains four drainages (jurisdictional waters) and riparian areas. In addition, the project site is in an area identified as critical habitat for the coastal California gnatcatcher. Similar to the proposed project, development of this alternative would develop the project site and would result in impacts to existing biological resources on-site and require similar permits and mitigation measures as the proposed project. This alternative would reduce the number of dwelling units by approximately 34 percent and could potentially preserve a slightly larger amount of open space compared to the proposed project. Therefore, impacts to biological resources under this alternative would be less than the proposed project. Biological resources are not a significant and unavoidable impact of the proposed project.

### 7.5.5 Cultural Resources

This alternative would redevelop and disturb a smaller area of the project site compared to the proposed project. However, similar to the proposed project, a mitigation measure that requires monitoring during certain grading activities would still be necessary. Compared to the proposed project, this alternative would reduce impacts to cultural resources because of the reduced number of dwelling units and smaller development area. Cultural resources are not a significant and unavoidable impact of the proposed project.

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### 7.5.6 Energy

Under this alternative, the number of residential units would be reduced to 727 dwelling units from 1,100 units, a 34 percent reduction. Therefore, this alternative is anticipated to result in a reduction in energy impacts compared to the proposed project. Energy is not a significant and unavoidable impact of the proposed project.

### 7.5.7 Geology and Soils

This alternative would redevelop and disturb a smaller portion of the project site compared to the proposed project. This alternative is expected to preserve more of the natural slopes on-site. However, as with the proposed project, new buildings and graded areas would be required to comply with the most recent building and seismic codes and regulations. Because this alternative would reduce the number of units to be constructed and areas to be graded, this alternative would reduce impacts related to geology and soils. Geology and soils are not a significant and unavoidable impact of the proposed project.

This alternative would reduce the area to be graded and excavated, although it would require a similar mitigation measure to reduce potential impacts to paleontological resources by requiring monitoring during ground-disturbing activities that occur in deposits that could potentially contain paleontological resources. Because the area of disturbance would be reduced, the potential for discovering and damaging paleontological resources would also be reduced. Paleontological resources is not a significant and unavoidable impact of the proposed project.

### 7.5.8 Greenhouse Gas Emissions

This alternative would contribute to global climate change through direct emissions of GHG from on-site area sources and vehicle trips generated. However, a decrease in the number of units and building area would likely result in reduced construction-related trips. During long-term operation, vehicle trips, VMT, and off-site energy production would be reduced when compared to the proposed project. GHG emissions impacts of this alternative would be less than the proposed project. However, the reduction in units would not be substantial enough to eliminate significant GHG emissions impacts. GHG emissions are not a significant and unavoidable impact of the proposed project.

### 7.5.9 Hazards and Hazardous Materials

The project site has historically contained and currently contains oil production activities and agriculture activities. All hazardous material concerns and remediation programs under this alternative would be identical to those encountered under the proposed project. As a result, impacts related to hazards and hazardous materials would be the same as the proposed project. Hazards and hazardous materials is not a significant and unavoidable impact of the proposed project.

### 7.5.10 Hydrology and Water Quality

This alternative would redevelop and disturb a smaller portion of the project site and preserve more land as open space. Because the area of soil disturbance would be smaller than the proposed project, hydrology and

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water quality impacts during construction would be less than the proposed project. And as with the proposed project, this alternative would be required to be graded in accordance with the NPDES Construction General Permit requirements and incorporate appropriate best management practices. Additionally, full buildout of this alternative would result in more pervious surfaces, since a larger portion of the project site would be maintained as open space. The increase in pervious surfaces would allow more rainwater to percolate into the ground. This alternative would reduce impacts related to hydrology and water quality compared to the proposed project. Nevertheless, similar to the proposed project, this alternative would likely result in housing development in the Carbon Canyon Dam inundation area, and would require the preparation and submittal of an emergency response plan to the Brea Fire Services Department. Hydrology and water quality is not a significant and unavoidable impact of the proposed project.

### 7.5.11 Land Use and Planning

Under this alternative the 217.7-acre north portion of the project site would be annexed to the City of Brea. Upon annexation, this portion of the project site would be zoned “HR” Hillside Residential, on the eastern side of the project site with a corresponding land use designation of Hillside Residential. The western portion of the project site would be zoned “R-1” Single-Family Residential, with a corresponding land use designation of Low Density Residential. Unlike the proposed project, this alternative would not necessitate any further zoning or land use designation change. This alternative would provide 73 affordable housing units per the City’s affordable housing ordinance. This alternative would reduce project-related trips by approximately 26.5 percent, reducing potential impacts to local and regional transportation system, including Caltrans facilities. Therefore, this alternative would better attain the RTP/SCS goal of preserving and ensuring a sustainable regional transportation system than the proposed project, which requires changes in land use designations. This alternative would not conflict with any land use plan, policy, or regulations, and no significant environmental impacts would occur. This alternative would reduce impacts related to land use and planning compared to the proposed project; however, the project’s impacts were also less than significant without mitigation.

### 7.5.12 Mineral Resources

The project site is in an MRZ 1 and MRZ 3. Development under this alternative would result in similar impacts to mineral resources as the proposed project. Similar to the proposed project, development of this alternative would not deplete or modify the availability of a known mineral resources. This alternative would have similar physical environmental impacts to mineral resources compared to the proposed project. Mineral resources is not a significant and unavoidable impact for the proposed project.

### 7.5.13 Noise

A reduction in building area would decrease the project-related construction noise impacts. This alternative would still be anticipated to implement the identified mitigation measures to ensure that construction-related noise levels are less than significant. However, the construction duration would be shortened, and the related construction noise would be reduced. The reduction in number of units would also decrease residential noise and traffic noise, thus reducing the operational noise impact compared to the proposed project. This alternative

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would reduce impacts related to both construction and operational noise. Noise is not a significant and unavoidable impact of the proposed project.

### 7.5.14 Population and Housing

As shown in Table 7-1 above, the buildout of this alternative would result in 727 dwelling units, which would be expected to generate approximately 2,000 new residents. Compared to the proposed project, this alternative results in 373 fewer dwelling units and 547 fewer residents than the proposed project (a 34 percent decrease for both). In addition, the jobs-to-housing ratio for this alternative would be 2.86 compared to the project's 2.80. Under this alternative, 73 affordable housing units would be constructed. The reduction of housing opportunities compared to the proposed project would worsen the jobs-to-housing ratio. Therefore, this alternative would have greater population and housing impacts compared to the proposed project. Population and housing is not a significant and unavoidable impact of the proposed project.

### 7.5.15 Public Services

This alternative would reduce the number of units developed on the project site, and therefore would generate less public services demands compared to the proposed project. However, the proposed project would provide special funding to improve fire safety facilities and training, and also provide locations for future fire safety and public safety/civic uses, as stipulated in the Development Agreement. Under this alternative, no additional special public safety facilities and sites would be provided to reduce fire service impacts to a less than significant level. Therefore, this alternative would result in greater fire services impact than the proposed project. Similar to the proposed project, a mitigation measure that requires Crime Prevention Through Environmental Design principles to reduce police services impact, and a mitigation measure to offset its fair share of the costs of providing additional library resources would still be necessary for this alternative. This alternative would decrease impacts related to police, school, and library services, and increase impacts related to fire protection. Public services are not a significant and unavoidable impact of the proposed project.

### 7.5.16 Recreation

This alternative would reduce the number of units developed on the project site, and therefore would reduce the number of residents at the project site. Similar to the proposed project, this alternative would be required to comply with Brea Municipal Code section 18.64.080, which requires the provision of park and recreational facilities through land dedication, installation of improvements, payment of in-lieu fee thereof, or a combination. Given the reduction of dwelling units and residents, this alternative would generate a reduced park and recreational demand compared to the proposed project. However, the 13-acre sports park with various recreational amenities would not be provided under this alternative. Therefore, this alternative would have similar environmental impacts on recreation as the proposed project. Recreation is not a significant and unavoidable impact of the proposed project.

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### 7.5.17 Transportation

Under this alternative, construction-related traffic would be reduced since there would be a reduction in residential units. This alternative would also reduce operation-related trips, generating 6,863 daily trips instead of 9,337 trips under the proposed project—a reduction of approximately 26.5 percent. Therefore, this alternative would reduce roadway intersection and segment queuing impacts on local and Caltrans facilities. As with the proposed project, with reduced daily trips but within the same traffic analysis zones, this alternative is anticipated to result in a VMT per service population that is less than the City’s threshold. Because this alternative would decrease daily and peak hour trips in area roadway systems, this alternative would have less traffic impacts in comparison with the proposed project. However, as with the proposed project, this alternative would be required to contribute its fair share pursuant to the City’s AB 1600 Transportation Improvement Nexus Program (Ordinance 996). This alternative would reduce impacts related to transportation compared to the proposed project. Transportation impacts are not a significant and unavoidable impacts of the proposed project.

### 7.5.18 Tribal Cultural Resources

Due to the lower unit count, grading and earthwork activities would disturb a smaller portion of the project site compared to the proposed project. Due to the earthwork activities, potential impacts still exist to subsurface tribal cultural resources. Similar to the proposed project, this alternative would need a mitigation measure requiring the retention of a qualified Native American monitor during construction. With the smaller development footprint and more open space, this alternative would reduce impacts relating to tribal cultural resources compared to the proposed project. Tribal cultural resources is not a significant and unavoidable impact of the proposed project.

### 7.5.19 Utilities and Service Systems

This alternative would result in 373 fewer dwelling units than the proposed project. The alternative would generate less wastewater and solid waste and less demand for water, electricity, gas, and telecommunication services compared to the proposed project. Given the smaller number of dwelling units, this alternative would have more pervious surfaces than the proposed project, and is therefore likely to result in reduced stormwater volume. This alternative would reduce overall utilities and service systems demands compared to the proposed project. Utilities and service systems are not a significant and unavoidable impact of the proposed project.

### 7.5.20 Wildfire

The project site is located within a very high FHSZ for incorporated LRA of the City of Brea and the OCFAs unincorporated LRA. This alternative would place 727 dwelling units on-site instead of 1,100 units. As with the proposed project, development under this alternative would be required to comply with the CFC and the City of Brea’s standards for fire protection, including providing fuel modification zones and implementing noncombustible construction and plants and landscaping, consistent with the Brea Hillside Zoning Ordinance and the Brea Fire Department Fuel Modification Guideline. This alternative would provide more opportunities for open space, which could be prone to wildfire risks, compared to more dense development with more

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impervious and nonflammable surfaces. Therefore, this alternative would have greater impacts related to wildfire. Wildfire is not a significant and unavoidable impact of the proposed project.

### 7.5.21 Conclusion

This alternative would lessen environmental impacts for Aesthetics, Air Quality, Biological Resources, Cultural Resources, Energy, Geology and Soils, GHG Emissions, Hydrology and Water Quality, Land Use and Planning, Noise, Public Services, Transportation, Tribal Cultural Resources, and Utilities and Service Systems. This alternative would be environmentally neutral for Agriculture and Forestry Resources, Hazards and Hazardous Materials, Mineral Resources, and Recreation. This alternative would worsen environmental impacts for Population and Housing and Wildfire. All mitigation measures identified for the proposed project would still be required. For these reasons, this alternative is considered environmentally superior to the proposed project.

## 7.6 HIGHER DENSITY DEVELOPMENT ALTERNATIVE

This alternative would increase development density in the 94.5-acre portion of the project site currently designated as Low Density Residential on the west side of Valencia Avenue, preserve 99.6 acres planned for Phase 3 development, and maintain the proposed density in the 68-acre, Phase 1 portion designated as Hillside Residential by the City's General Plan. This alternative would develop Phase 2 area on the west side of Valencia Avenue with 747 units, combining units proposed for Phase 2 (612 units) and Phase 3 (135 units), to increase density to 7.9 dwelling units per acre. The 68-acre, Phase 1 portion of the project site would be developed with 353 units, a density of 5.2 units per acre. Therefore, this alternative would have an overall density of 6.8 dwelling units per acre. It is anticipated that more townhome units and higher density attached units with less building area would be constructed on the west side, and low-density and medium-density units as proposed could be constructed on the east side. This alternative would decrease the overall trips generated by the proposed project due to increase in higher density units. Higher-density residential units have a lower trip generation rate than low density single family units. This alternative would provide the same number of affordable housing units as the proposed project, 76 affordable housing. This alternative would reduce operational air quality and GHG emissions impacts. This alternative would require a general plan amendment, rezoning, and annexation.

### 7.6.1 Aesthetics

As with the proposed project, the implementation of this alternative would result in a change in the existing visual character of the project site. Under this alternative, greater density and intensity would be placed on the west side of the project site (747 dwelling units), and a reduced density would be placed on the eastern side of the project site (353 dwelling units). To accommodate 747 units on the west side of the project site, the residential units would be largely townhome and multifamily residential. This alternative would increase density on the west side of the project site and maintain density on the east side for the Phase 1 area compared to the proposed project. The Phase 3 area of the project site east of Valencia Avenue would not be developed. The city's visual resources are to the north and east of the project site, including Chino Hills State Park and Carbon Canyon Regional Park. This alternative would preserve the existing hills and natural slopes in the Phase 3 area adjacent to Carbon Canyon Regional Park and protect the view corridors on Rose Drive identified in Figure

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5.1-1, *Brea Scenic Resources*. This alternative would result in less environmental impact related to aesthetics. Aesthetic impact is not a significant and unavoidable impact of the proposed project.

### 7.6.2 Agriculture and Forestry Resources

As with the proposed project, development under this alternative would remove the existing agricultural uses on-site. Impacts of the proposed project on agricultural and forestry resources were found to be less than significant prior to mitigation. This alternative's impact to agriculture and forestry resources would be similar to the proposed project. Agriculture and forestry resources is not a significant and unavoidable impact of the proposed project.

### 7.6.3 Air Quality

This alternative would result in the same number of dwelling units as the proposed project. Given that this alternative would result in more townhomes and multifamily residential and more cluster development, the cluster development would decrease the amount of grading required. The reduced grading would reduce construction-related air quality impacts compared to the proposed project. During operation, this alternative would generate fewer vehicle trips because there would be more townhomes and multifamily units, and the trip generation rate for a multifamily unit is less than for a single-family unit. Reduced footprints on buildings would likely result in decreased energy use and less area source emissions. This alternative would therefore result in a decrease in short-term construction impacts and long-term operational air quality impacts compared to the proposed project. However, it would not eliminate the significant and unavoidable operational air quality impact. Construction air quality is not a significant and unavoidable impact of the proposed project, but operational air quality is a significant and unavoidable impact of the proposed project.

### 7.6.4 Biological Resources

The project site contains sensitive wildlife, vegetation, and habitat and jurisdictional waters (drainages). Development under this alternative would increase density on the western side of the project site and decrease density on the eastern side. More lands would be preserved as open space on the eastern side of the project site. The area west of Valencia Avenue is not designated critical habitat for the coastal California gnatcatcher, and the Phase 3 area to be preserved contains jurisdictional waters and various sensitive and special status habitats and species. Therefore, these species would not be impacted. This alternative would reduce biological impacts compared to the proposed project. Biological resources is not a significant and unavoidable impact of the proposed project.

### 7.6.5 Cultural Resources

Due to the cluster design, this alternative would redevelop and disturb a smaller area of the project site compared to the proposed project. Compared to the proposed project, this alternative would reduce impacts to cultural resources because of the smaller development area. However, similar to the proposed project, a mitigation measure that requires monitoring during certain grading activities would still be necessary. Cultural resources is not a significant and unavoidable impact of the proposed project.

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### 7.6.6 Energy

Under this alternative, the number of residential units would remain the same as the proposed project (1,100 dwelling units). However, with the smaller footprint of the buildings and higher density products, energy uses are anticipated to be less than low-density units. This alternative would result in an overall reduction for energy consumption compared to the proposed project. Energy is not a significant and unavoidable impact of the proposed project.

### 7.6.7 Geology and Soils

Due to the cluster design, this alternative would redevelop and disturb a smaller portion of the project site compared to the proposed project. The eastern hillside with natural slopes would be preserved as open space. As with the proposed project, new buildings and graded areas would be required to comply with the most recent building and seismic codes and regulations. This alternative would reduce impacts related to geology and soils. Geology and soils is not a significant and unavoidable impact of the proposed project.

This alternative would reduce the area to be graded and excavated, although it would require a similar mitigation measure to reduce potential paleontological resources impacts by requiring monitoring during ground-disturbing activities that occur in deposits that could potentially contain paleontological resources. Because the area of disturbance would be reduced, the potential for discovering and damaging paleontological resources would also be reduced. Paleontological resources is not a significant and unavoidable impact of the proposed project.

### 7.6.8 Greenhouse Gas Emissions

This alternative would contribute to global climate change through direct emissions of GHG from onsite area sources and vehicle trips generated. Similar to the proposed project, this alternative would result in 1,100 dwelling units. However, more compact development and an increase in townhomes and multifamily residential would decrease building area and lead to slightly decreased emissions during construction. During long-term operation, vehicle trips, VMT, and off-site energy production would also be decreased given the lower trip rates of higher density units. GHG emissions impacts of this alternative be less than the proposed project. However, it would not eliminate the significant and unavoidable GHG emissions impact. GHG emissions impact is a significant and unavoidable impact of the proposed project.

### 7.6.9 Hazards and Hazardous Materials

The project site has historically contained and currently contains oil production activities and agriculture activities. Under this alternative, hazardous material concerns and remediation programs for the eastern north half of the project site would not be provided as the area would be preserved as is. As a result, impacts related to hazards and hazardous materials would be greater than the proposed project. Hazards and hazardous materials is not a significant and unavoidable impact of the proposed project.

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### 7.6.10 Hydrology and Water Quality

This alternative would redevelop and disturb a smaller portion of the project site and preserve more land as open space. Therefore, the area of soil disturbance would be smaller than the proposed project, and hydrology and water quality impacts during construction would be less than the proposed project. And as with the proposed project, this alternative would be required to be graded in accordance with the NPDES Construction General Permit requirements and incorporate appropriate best management practices. Additionally, full buildout of this alternative would result in more pervious surfaces, since a larger portion of the project site would be maintained as open space. The increase in pervious surfaces would allow more rainwater to percolate into the ground. This alternative would reduce impacts related to hydrology and water quality compared to the proposed project. Nevertheless, similar to the proposed project, this alternative would likely result in housing development in the Carbon Canyon Dam inundation area and would require the preparation and submittal of an emergency response plan to the Brea Fire Services Department. Hydrology and water quality is not a significant and unavoidable impact of the proposed project.

### 7.6.11 Land Use and Planning

This alternative would require specific plan, rezoning, development agreement, annexation, and affordable housing incentives approvals. Although the same number of units would be constructed under this alternative, more townhomes and higher density units would make up the housing mix, resulting in a reduction in project-related trips compared to the proposed project. Therefore, this alternative would reduce potential impacts to local and regional transportation systems, including Caltrans facilities, and also reduce VMT per population. A reduction in daily trips would also have less impact than the proposed project to the RTP/SCS goal of preserving and ensuring a sustainable regional transportation system. Therefore, this alternative would result in less impacts related to land use and planning as compared to the proposed project. Land use and planning is not a significant and unavoidable impact for the proposed project.

### 7.6.12 Mineral Resources

The project site is in MRZ 1 and MRZ 3. Development under this alternative would reduce impacts to mineral resources because it would preserve the Phase 3 area (approximately 99.6 acres) in its current condition. Mineral resources is not a significant and unavoidable impact for the proposed project.

### 7.6.13 Noise

Under this alternative, more high density townhomes and attached housing units would be constructed on the more flat, west side of Valencia Avenue, while preserving natural slopes, hills, and open space on the east side of Valencia Avenue. Therefore, although the overall number of units would not change, a reduction in building area and less site preparation and grading on the east side would decrease the project-related construction noise impacts. This alternative would also result in decreased operational noise due to decreased project-related vehicle trips. The noise associated with the 13-acre sports park would also be eliminated. This alternative would still be anticipated to implement the identified mitigation measures to ensure that construction-related noise levels are less than significant. However, this alternative would result in less construction and operational noise

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impacts compared to the proposed project. Noise is not a significant and unavoidable impact of the proposed project.

### 7.6.14 Population and Housing

This alternative would result in the same number of units as the proposed project, which would generate the same amount of residents and jobs-to-housing ratio. This alternative would also provide affordable housing units. This alternative is environmentally neutral compared to the proposed project. Population and housing is not a significant and unavoidable impact of the proposed project.

### 7.6.15 Public Services

This alternative would provide the same number of units as the proposed project, and therefore would result in similar impacts related to fire, police, school, and library services. Impacts of the proposed project on fire, police, and school services were found to be less than significant with and without mitigation. This alternative is environmentally neutral compared to the proposed project. Public services are not a significant and unavoidable impact of the proposed project.

### 7.6.16 Recreation

This alternative would result in the same number of units as the proposed project, which would generate the same number of residents who could demand parks and recreational in the area. This alternative would not provide the 13-acre sports park, and the Phase 3 area would be preserved and not be accessible to the public, as it is currently not accessible. Because this alternative would provide open space that would be inaccessible to the public, this alternative would result in a greater impact compared to the proposed project. Recreation is not a significant and unavoidable impact of the proposed project.

### 7.6.17 Transportation

Under this alternative, construction-related traffic would be reduced since there would be a reduction in building area and less grading on the hillside, shortening construction duration. This alternative provides for the same number of units as the proposed project but result in fewer daily trips because higher-density attached units have a lower trip generation rate than single-family detached units. Traffic would be distributed differently, according to the distinct traffic patterns unique to the shift in density to the west side of the project site, with the result that impacts would be reduced at some points and increased at others. Although the trips would be slightly reduced, similar roadway improvements would still be required under this alternative. This alternative would also result in less VMT per population This alternative would reduce traffic impacts compared to the proposed project. Transportation impact is not a significant and avoidable impact of the proposed project.

### 7.6.18 Tribal Cultural Resources

Due to the cluster design, grading and earthwork activities would disturb a smaller portion of the project site compared to the proposed project. Due to the earthwork activities, potential impacts still exist to subsurface tribal cultural resources. Similar to the proposed project, this alternative would need a mitigation measure

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requiring the retention of a qualified Native American monitor during construction. With the smaller development footprint and more open space, this alternative would reduce impacts relating to tribal cultural resources compared to the proposed project. Tribal cultural resources is not a significant and unavoidable impact of the proposed project.

### 7.6.19 Utilities and Service Systems

This alternative would result in the same number of dwelling unit and would be expected to generate the same number of residents as the proposed project. As a result, this alternative would be expected to generate the same demand for water, wastewater treatment, solid waste disposal, electricity, gas, and telecommunication. This alternative is environmentally neutral compared to the proposed project. Utilities and service systems is not a significant and unavoidable impact of the proposed project.

### 7.6.20 Wildfire

The entire project site is located within a very high FHSZ for Brea's incorporated LRA and OCFA's unincorporated LRA. This alternative would place 780 dwelling units on the west side and 320 units on the east side of the project site. As with the proposed project, development under this alternative would be required to comply with the CFC and the City of Brea's and OCFA's standards for fire protection, including providing fuel modification zones and implementing noncombustible construction and plants and landscaping consistent with the Brea Hillside Zoning Ordinance, OCFA Guideline C-05, and the Brea Fire Department Fuel Modification Guideline. This alternative would provide more opportunities for open space on the east side, which could be prone to wildfire risks, compared to more dense development with more impervious and nonflammable surfaces. Therefore, this alternative would have greater impacts related to wildfire. Wildfire is not a significant and unavoidable impact of the proposed project.

### 7.6.21 Conclusion

This alternative would lessen environmental impacts for Aesthetics, Air Quality, Biological Resources, Cultural Resources, Energy, Geology and Soils, GHG Emissions, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Noise, Transportation, and Tribal Cultural Resources. This alternative would be environmentally neutral for Agriculture and Forestry Resources, Population and Housing, Public Services, and Utilities and Service Systems. This alternative would worsen environmental impacts for Hazards and Hazardous Materials, Recreation, and Wildfire. For these reasons, this alternative is considered environmentally superior to the proposed project. However, all mitigation measures identified for the proposed project would still be required, and this alternative would not eliminate the significant and unavoidable operational air quality and GHG emissions impacts.

## 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

## 7. Alternatives to the Proposed Project

development alternative must be identified. As summarized in Table 7-2, all project alternatives would be environmentally superior to the proposed project.

**Table 7-2 Summary of Proposed Project and Alternatives**

Topic	Proposed Project	Alternative 1: No Project/Existing County of Orange General Plan Development	Alternative 2: No Project/Existing City of Brea General Plan Development	Alternative 3: Cluster Development
5.1. Aesthetics	LTS	-	-	-
5.2. Agriculture	LTS	=	=	=
5.3. Air Quality				
Short-Term Construction	LTS/MM	-	-	-
Long-Term Operation	SU/MM	-	-	-
5.4. Biological Resources	LTS/MM	-	-	-
5.5. Cultural Resources	LTS/MM	-	-	-
5.6. Energy	LTS	-	-	-
5.7. Geology and Soils	LTS	-	-	-
Paleontology	LTS/MM	-	-	-
5.8. Greenhouse Gas Emissions	SU/MM	-	-	-
5.9. Hazards and Hazardous Materials	LTS/MM	=	=	+
5.10. Hydrology and Water Quality	LTS/MM	-	-	-
5.11. Land Use and Planning	LTS	-	-	-
5.12. Mineral Resources	LTS	=	=	-
5.13. Noise				
Short-Term Construction	LTS/MM	-	-	-
Long-Term Operation	LTS	-	-	-
5.14. Population and Housing	LTS	+	+	=
5.15. Public Services	LTS/MM	-	-	=
5.16. Recreation	LTS	=	=	+
5.17. Transportation	LTS	-	-	-
5.18. Tribal Cultural Resources	LTS/MM	-	-	-
5.19. Utilities and Service Systems	LTS/MM	-	-	=
5.20. Wildfire	LTS/MM	+	+	+

Notes: NI: No impact; LTS: Less than Significant; LTS/MM: Less than Significant with Mitigation Incorporated; SU: Significant and Unavoidable

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

(+) The alternative would result in more of an impact than the proposed project.

(=) The alternative would result in the same or similar impact as the proposed project.

## 7. Alternatives to the Proposed Project

Table 7-3 identifies the ability of the proposed project and each alternative to achieve project objectives.

**Table 7-3 Ability of Each Alternative to Meet the Project Objectives**

Objective	Proposed Project	Alternative 1: No Project/Existing County of Orange General Plan Development	Alternative 2: No Project/Existing City of Brea General Plan Development	Alternative 3: Higher Density Development
1. Organize the land plan to facilitate the provision of proposed land uses and amenities.	YES	Partially	Partially	Partially
2. Integrate a comprehensive walking and biking trail system that provides physical and visual connections to enhance walkability, linking neighborhoods to key amenities and open space areas within Brea 265 and to the existing trails in the greater Brea community, including Brea Sports Park, Carbon Canyon Regional Park, and Chino Hills State Park.	YES	Partially	Partially	NO
3. Enhance public benefits by incorporating a variety of parks, paseos, parkways, and open space features that meet the recreational needs of the residents, enhance pedestrian orientation, and contribute to community aesthetics.	YES	NO	NO	NO
4. Provide a housing mix ranging from conventional single-family homes and detached cluster homes to townhomes and apartments, including workforce and affordable housing units.	YES	NO	NO	Partially
5. Incorporate development standards specifically crafted for the latest residential design concepts and neighborhood designs that are popular with homebuyers.	YES	NO	NO	Partially
6. Provide flexibility in plan implementation to allow for changes in future market conditions.	YES	NO	NO	NO
7. Use the Specific Plan as a tool to implement the City's affordable housing requirements and the State's Density Bonus Law.	YES	NO	Partially	YES
8. Establish a distinctive community character through place-making elements that embrace and respect the site's oil industry history and special physical attributes.	YES	NO	NO	Partially
9. Incorporate sustainable design and development approaches, including walkable communities, water quality features, and water- and energy-efficient landscape and building design. Encourage the use of sustainable building materials, where feasible.	YES	Partially	Partially	Partially

## 7. Alternatives to the Proposed Project

**Table 7-3 Ability of Each Alternative to Meet the Project Objectives**

Objective	Proposed Project	Alternative 1: No Project/Existing County of Orange General Plan Development	Alternative 2: No Project/Existing City of Brea General Plan Development	Alternative 3: Higher Density Development
10. Ensure appropriate phasing and financing for community facilities, including circulation and streetscape improvements; water, sewer, and drainage facilities; and parks and recreational facilities.	YES	Partially	Partially	Partially
11. Provide the fire management plan to reduce the threat of wildfire and create a fire-resistant buffer between homes and the adjacent open space areas of Carbon Canyon Regional Park.	YES	NO	NO	NO

“Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts” (CEQA Guidelines § 15126.6[c]). Both of the No Project alternatives would reduce many of the environmental impacts identified under the proposed project, but would not be able to eliminate significant and unavoidable impacts related to GHG emissions and operational air quality. And they would only provide single-family detached units and eliminate the opportunity to provide a housing mix with a density of 1 to 12 dwelling units per acre, with flexibility in implementation. Both No Project alternatives would only partially meet the project objectives. The City of Brea is a job-rich community with imbalanced jobs-housing ratio and does not meet the regional housing attainment goal for low-income units. The Higher Density Development Alternative would reduce many of the environmental impacts but would not be able to eliminate significant and unavoidable impacts related to GHG emissions and operational air quality. It would also have greater impacts related to hazards and hazardous materials, recreation, and wildfire. This alternative would only partially meet most of the project objectives. Although all project alternatives have been identified as environmentally superior to the proposed project, they would not eliminate the significant and unavoidable GHG and air quality impacts, and the same mitigation measures as the proposed project would need to be incorporated.