

6.0 Alternatives

This section addresses alternatives to the proposed Project and describes the rationale for including them in the EIR. The section also discusses the environmental impacts associated with each alternative and compares the relative impacts of each alternative to those of the proposed Project. In addition, this section describes the extent to which each alternative meets the Project objectives.

6.1 INTRODUCTION

The identification and analysis of alternatives to a project is a fundamental part of the environmental review process pursuant to CEQA. Public Resources Code (PRC) Section 21002.1(a) establishes the need to address alternatives in an EIR by stating that in addition to determining a project's significant environmental impacts and indicating potential means of mitigating or avoiding those impacts, "the purpose of an environmental impact report is . . . to identify alternatives to the project."

Pursuant to *CEQA Guidelines* Section 15126.6(a), an EIR must describe a reasonable range of alternatives to the proposed Project or to the Project's location that would feasibly avoid or lessen its significant environmental impacts while attaining most of the proposed Project's objectives. *CEQA Guidelines* Section 15126.6(b) emphasizes that the selection of project alternatives be based primarily on the ability to reduce impacts relative to the proposed project. In addition, *CEQA Guidelines* Section 15126.6(e)(2) requires the identification and evaluation of an "Environmentally Superior Alternative."

Pursuant to *CEQA Guidelines* Section 15126.6(d), discussion of each alternative presented in this EIR Section is intended "to allow meaningful evaluation, analysis, and comparison with the proposed project." As permitted by CEQA, the significant effects of each alternative are discussed in less detail than those of the proposed Project, but in enough detail to provide perspective and allow for a reasoned choice among alternatives to the proposed Project.

In addition, the "range of alternatives" to be evaluated is governed by the "rule of reason" and feasibility, which requires the EIR to set forth only those alternatives that are feasible and necessary to permit an informed and reasoned choice by the lead agency and to foster meaningful public participation (*CEQA Guidelines* Section 15126.6(f)). CEQA generally defines "feasible" to mean an alternative that is capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, technological, and legal factors and other considerations (*CEQA Guidelines* Sections 15091(a)(3), 15364).

Based on the CEQA requirements described above, the alternatives addressed in this EIR were selected in consideration of one or more of the following factors:

- The extent to which the alternative could avoid or substantially lessen any of the identified significant environmental effects of the proposed Project;
- The extent to which the alternative could accomplish the objectives of the proposed Project;
- The potential feasibility of the alternative;
- The appropriateness of the alternative in contributing to a "reasonable range" of alternatives that would allow an informed comparison of relative advantages and disadvantages of the proposed Project and potential alternatives to it; and

- The requirement of the *CEQA Guidelines* to consider a “no project” alternative; and to identify an “environmentally superior” alternative in addition to the no project alternative (*CEQA Guidelines* Section 15126.6(e)).

Neither the CEQA statute, the *CEQA Guidelines*, nor recent court cases specify a specific number of alternatives to be evaluated in an EIR. Rather, “the range of alternatives required in an EIR is governed by the rule of reason that sets forth only those alternatives necessary to permit a reasoned choice” (*CEQA Guidelines* 15126(f)).

6.2 SIGNIFICANT AND UNAVOIDABLE ENVIRONMENTAL IMPACTS

CEQA requires the alternatives selected for comparison in an EIR to avoid or substantially lessen one or more significant effects of the project being evaluated. In order to identify alternatives that would avoid or substantially lessen any of the identified significant environmental effects of implementation of the proposed Project, the significant impacts must be considered, although it is recognized that alternatives aimed at reducing the significant and unavoidable impacts would also avoid or reduce impacts that were found to be less than significant or reduced to below a level of significance with implementation of mitigation measures. The analysis in Chapter 5 of this EIR determined that impacts related to the following would remain significant and unavoidable.

Air Quality

As detailed, in Section 5.2, *Air Quality*, implementation of the proposed Project, would result in long-term emissions of criteria air pollutants from vehicular emissions, natural gas consumption, landscaping, applications of architectural coatings, and use of consumer products. The emissions from the proposed Project are primarily from vehicle trips. As described in Section 5.14, *Transportation*, the proposed Project is anticipated to generate 11,546 daily vehicular trips, with 534 a.m. peak hour trips and 604 p.m. peak hour trips.

As shown in Table 5.2-8 in Section 5.2, *Air Quality*, emissions from operation of the proposed Project would exceed the threshold of significance for volatile organic compounds (VOCs). The majority of VOC emissions would be derived from consumer products and vehicular activity. Consumer products include cleaning supplies, kitchen aerosols, cosmetics and toiletries, the use of which cannot be controlled by the City. Likewise, vehicular emissions cannot be controlled by either the Project Applicant or the City. There are no feasible mitigation measures that would reduce VOC emissions to below the South Coast Air Quality Management District (SCAQMD) threshold. Therefore, Project operational emissions would be significant and unavoidable.

Greenhouse Gases

As detailed, in Section 5.6, *Greenhouse Gas Emissions*, the Project would result in a net increase in GHG emissions of 9,861.60 metric tons of carbon dioxide equivalence (MTCO_{2e}) per year, which would be 4.10 MTCO_{2e} annually per service population. This would exceed the SCAQMD Tier 3 screening threshold of 3,000 MTCO_{2e} and exceed the SCAQMD Tier 4/City CAP threshold of 3.16 MTCO_{2e} per service population.

Approximately 60 percent of the Project’s GHG emissions would be generated by mobile sources (vehicle trips), and there are no feasible Project measures that would reduce vehicular emissions. Thus, neither the Project Applicant nor the Lead Agency (City of Santa Ana) can substantively or materially affect reductions in Project mobile-source emissions.

The Project is consistent with the California Air Pollution Control Officers Association (CAPCOA) guidance for mitigating or reducing transportation related (Vehicle Miles Traveled) VMT from land use development projects. The Project is an urban infill redevelopment that would provide mixed residential and commercial (retail/restaurant) uses. The site located near existing off-site employment, commercial, residential, and retail destinations and in proximity to existing public bus stops and freeways, which would result in reduced vehicle trips and VMT in comparison to a Project of similar size on land without close access to employment, service, and retail, destinations; in addition to public transit and freeways. Additionally, the Project would be constructed to current Title 24/CalGreen standards and would be consistent with policies that have been adopted for the purpose of mitigating a GHG effect. However, because the net increase in GHG emissions from the Project would exceed SCAQMD Tier 3 screening threshold of 3,000 MTCO_{2e} and exceed the SCAQMD Tier 4/City CAP threshold of 3.16 MTCO_{2e} per service population, impacts related to GHG emissions would be significant and unavoidable.

Transportation

As detailed, in Section 5.14, *Transportation* (Table 5.14-9), with implementation of the proposed Project with the Year 2040 traffic conditions, the Project would result in impacts at five intersections. Improvements for the impacted intersections have been identified, which would reduce impacts to less than significant. However, improvements at the intersections of Red Hill Avenue/Warner Avenue (#25), Red Hill Avenue/ Barranca Parkway (#30), Red Hill Avenue/Alton Parkway (#32), and Tustin Ranch Road/Warner Avenue North (#47) cannot be guaranteed because they require approval and/or implementation by the City of Tustin or the City of Irvine. The improvement at the Grand Avenue/Warner Avenue (#4) intersection is required as a result of a cumulative impact; the intersection operates with unsatisfactory level of service (LOS) in the baseline condition. The Project would be responsible for a fair share of the improvement through implementation of mitigation; however, there is no currently planned improvement at the location, and it is unknown if the Grand Avenue/Warner Avenue improvement would be implemented by 2040 (the impact year). Therefore, implementation of the Project would result in a significant and unavoidable impact under the Year 2040 Plus Project condition at these five intersections.

Thus, this alternatives analysis is focused on the ability to reduce operational air quality emissions, greenhouse gas emissions, and vehicular trips. In addition, this alternative analysis is focused on reducing the need for mitigation. The alternative that would reduce the significant and unavoidable impacts and would require the least mitigation is considered the environmentally superior alternative. The proposed Project would require mitigation related to the following: hazardous materials, land use and planning, transportation, and tribal cultural resources. In addition, this alternatives analysis evaluates the potential of the alternative(s) to meet the Project objectives pursuant to the requirements of the CEQA Guidelines described previously.

6.3 PROJECT OBJECTIVES

The following objectives have been identified in order to aid decision makers in their review of the proposed Project and its associated environmental impacts.

- Develop a mixed-use Project that constructs new multi-family residential units, which would help meet the region's demand for housing.
- Transform an underutilized site with an economically viable development consistent with other regional redevelopment in the Tustin Legacy Specific Plan and Irvine Business Complex (IBC) and combines residential uses with community-serving retail near employment opportunities, freeway access, and transit.

- Redevelop existing land uses that would utilize existing infrastructure, including: water, sewer, arterial roadways, transit, and freeways; and provide non-vehicular (pedestrian and bicycle) circulation.
- Develop a mix of housing to assist the City in meeting its jobs/housing balance.
- Provide onsite uses that reduce vehicular miles traveled (VMT) by providing an internal pedestrian circulation system that links residential uses, recreation areas, and retail/commercial areas onsite.
- Implement the SCAG Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) Land Use Policies related to population and housing by providing additional housing near employment centers.

6.4 ALTERNATIVES CONSIDERED BUT REJECTED

Pursuant to *CEQA Guidelines* Section 15126.6(c), an EIR must briefly describe the rationale for selection and rejection of alternatives. The lead agency may make an initial determination as to which alternatives are potentially feasible and, therefore, merit in-depth consideration, and which are infeasible and need not be considered further. Alternatives that are remote or speculative, or the effects of which cannot be reasonably predicted, need not be considered (*CEQA Guidelines* Section 15126.6(f), (f)(3)). This section identifies alternatives considered by the lead agency but rejected as infeasible and provides a brief explanation of the reasons for their exclusion. Alternatives may be eliminated from detailed consideration in the EIR if they fail to meet most of the project objectives, are infeasible, or do not avoid any significant environmental effects.

- **Alternate Site Alternative:** An alternate site for the proposed Project was eliminated from further consideration. The Project Applicant is the owner of the Project site, and the Project site building is underutilized in the existing condition. The Project objectives are to redevelop an existing underutilized parcel and implement new multi-family housing near employment, provide development consistent with other regional redevelopment in the Tustin Legacy Specific Plan and IBC and utilize existing infrastructure, all of which are consistent with the opportunities provided by the Project site. In addition, due to the urban and built out nature of the City, development of 1,150 multi-family residential units and 80,000 square feet of commercial uses on another 14.58-acre site at a different location would likely require demolition of existing structures, require similar mitigation, and have similar impacts as the proposed Project. CEQA specifies that the key question regarding alternative site consideration is “whether any of the significant effects of the project would be avoided or substantially lessened by putting the project at another location.” Given the size and nature of the proposed Project and the Project objectives, it would be infeasible to develop and operate the Project on an alternative site with fewer environmental impacts. Therefore, the Alternative Site Alternative was rejected from further consideration.

6.5 ALTERNATIVES SELECTED FOR FURTHER ANALYSIS

Three alternatives to the proposed Project have been identified for further analysis as representing a reasonable range of alternatives that attain most of the objectives of the Project, may avoid or substantially lessen any of the significant effects of the proposed Project, and are feasible from a development perspective. These alternatives have been developed based on the criteria identified in Section 6.1, and are described below:

Alternative 1: No Project/No Build. Pursuant to Section 15126.6(e)(2) of the *CEQA Guidelines*, the EIR is required to “discuss the existing conditions at the time the notice of preparation is published, or if no notice

of preparation is published, at the time the 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.”

Therefore, under this alternative, no development would occur on the Project site and it would remain in its existing condition with three existing buildings with a total 212,121 square feet. However, as described in Section 6.4, the Project site is located within a completely developed and highly used urban area, near freeways and transit, and contains three existing useable structures. Therefore, it is not reasonable to assume that the Project site would remain underutilized in the long-term. Thus, in the No Project/No Build condition it is reasonably expected that all of the 212,121 square feet of industrial building space would be re-occupied. Hence, this alternative compares impacts of the proposed Project with re-occupation at full capacity of the three existing industrial buildings.

Alternative 2: Reduced Project Alternative. Under this alternative, a reduction in the number of residential units and commercial square footage would be built, which would result in increased setbacks and reduced building heights. Pursuant to discussion with City planning staff, it was determined that a reasonable decrease in developed on the Project site is 30 percent of each unit type and a 30 percent reduction in commercial retail space resulting in 345 fewer residential units and 24,000 square feet less of commercial space. Like the proposed Project, 17 percent of the units would be studios, 52 percent would be one-bedroom units, and 29 percent would be 2-bedroom units. This alternative would develop and operate 805 multi-family residential units and 56,000 square feet of retail and restaurant commercial uses.

Reducing these units from the proposed Project would eliminate 100 units from each of the three proposed mixed use buildings and 45 units from the residential only building, which would reduce the height of the three six-story mixed use buildings by two stories and reduce the height of the one five-story building by one story. Thus, each of the mixed-use and residential buildings would be four-stories in height under the Reduced Project Alternative.

To support the reduced Project under this alternative parking spaces would be provided at the same rate as the proposed Project of 1.7 spaces per residential unit and 5 spaces per 1,000 square feet of commercial space within a two four-level parking structures and two five-level parking structures, which would each be two levels lower than the proposed Project. The 24,000 square foot reduction in commercial space would occur from reducing the Phase 1 commercial square footage from 40,000 square feet to 20,000 square feet and from reducing the Phase 3 commercial square footage from 20,000 square feet to 16,000 square feet.

Under the Reduced Project Alternative, the recreation amenities would also be reduced by 30 percent; thus, approximately 122,189 square feet of exterior open space recreation area and approximately 5,606 square feet of indoor amenities would be provided by this alternative.

Like the proposed Project, this alternative would require a General Plan Amendment from the existing land use designation of PAO (Professional and Administrative Office) to District Center (DC), and a Zone change from M-1 (Light Industrial) to a Specific Development (SD) designation.

Alternative 3: Build Out of the Existing Land Use and Zoning Alternative. The Project site has a General Plan Land Use designation of Professional and Administrative Office (PAO) with a designated Floor Area Ratio (FAR) of 0.5 and is zoned Light Industrial (M-1). Under this alternative, the Project site would be redeveloped for a new light industrial business park as allowed by the existing General Plan Land Use designation and the City’s Zoning Code Sections 41-472 through 41-483. The Project site has a zoning

designation of Light Industrial (M-1), which permits uses such as: warehousing, distribution, manufacture, assembly, and storage. The M-1 zone allows buildings up to 3-stories or 35-feet in height.

At the allowable 0.5 FAR, the 14.58-acre site would provide for approximately 317,552 square feet of light industrial building space and building heights of up to 35-feet. These buildings would require approximately 635 parking spaces (per Municipal Code Section 41-1390 requirement of 2 spaces per 1,000 square feet). The industrial buildings would be surrounded by drought tolerant ornamental landscaping.

Under this alternative, the existing onsite development would be demolished, removed, and replaced to provide new building structures that would be developed pursuant to current building requirements, such as energy efficient power systems, drought tolerant landscaping, storm water filtration, and other Low Impact Development (LID) requirements.

6.6 ALTERNATIVE 1: NO PROJECT/NO BUILD

Under this alternative, the proposed Project would not be approved, and no development would occur. The existing three industrial buildings would remain. In accordance with the CEQA Guidelines, the No Project/No Build Alternative for a development project on an identifiable property consists of the circumstance under which the project does not proceed. Section 15126.6(e)(3)(B) of the CEQA Guidelines states that, "In certain instances, the no project alternative means 'no build' wherein the existing environmental setting is maintained." In addition, the no project includes 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.

Because the Project site is located within a completely developed and highly used urban area, near freeways and transit, and contains three existing useable structures and it is reasonable to assume that all three buildings and the 212,121 square feet industrial building space would be re-occupied. Hence, this alternative compares impacts of the proposed Project with re-occupation at full capacity of the existing industrial buildings. Accordingly, Alternative 1: No Project/No Build provides a comparison between the environmental impacts of the proposed Project in contrast to the result from not approving, or denying, the proposed Project. Thus, this alternative is intended to meet the requirements of CEQA Guidelines Section 15126.6(e) for evaluation of a no project alternative.

6.6.1 ENVIRONMENTAL IMPACTS

Aesthetics

The No Project/No Build Alternative would maintain the existing light industrial character of the Project site. As described in Section 5.1, *Aesthetics*, the Project site is developed with three large industrial buildings that total 212,121 square feet, parking areas, and vehicle circulation drives. Two of the industrial buildings are two-stories in height and one is three-stories in height. The vegetation on site consists of an approximately 2.5-acre undeveloped grass area at the corner of Red Hill and Warner Avenues, some ornamental trees scattered throughout the site, and street trees along Red Hill Avenue and Warner Avenue.

The exteriors of the buildings are long and flat, without architectural treatments. The buildings have a typical boxy modern office/industrial structure appearance, with large dark tinted windows line the first and second floors of the 2310 South Redhill building and that make up a large portion of the front of the 2320 South Redhill building. The dark window tinting provides a black appearance from the outside. The 2320 building has exterior metal stairs to access the second story of the building and the 2310 building has very few

windows, which adds to the industrial appearance. All three buildings have loading docks and industrial door openings and are surrounded by asphalt paved surface parking areas.

In comparison to the proposed Project, the No Project/No Build Alternative would not increase the building density or change the character of the site from one of light industrial uses to a high-density multi-family residential and commercial development. This alternative would not result in a change in the visual height, scale, and mass of the development on the site. The existing 2.5-acre undeveloped grass area at the corner of Red Hill and Warner Avenues would remain. However, the landscaping on the Project site would not be improved, and the site would not be redeveloped to be consistent with development within the adjacent Tustin Legacy Specific Plan area. Overall, the No Project/No Build Alternative would not develop taller denser mixed-use structures on the Project site and views of the Project site would not change. In addition, lighting and glare would not increase and would remain the same as existing conditions.

Air Quality

The proposed Project would result in short-term construction-related emissions and long-term operational emissions that would result in significant and unavoidable impacts related to emissions from VOCs. The majority of VOC emissions would be derived from consumer products and vehicular emissions. Consumer products include cleaning supplies, kitchen aerosols, cosmetics and toiletries, the use of which cannot be controlled by the City. Likewise, vehicular emissions cannot be controlled by either the Project Applicant or the City. Therefore, operational emissions would be significant and unavoidable.

The No Project/No Build Alternative would avoid the majority of short-term construction-related emissions because only tenant improvements to the existing building could occur under this alternative; and an increase in operational emissions would not occur. However, operation of the existing buildings at full capacity results in an exceedance of oxides of nitrogen (NO_x) threshold. The estimated operation-source emissions from operation of the existing 212,121 square feet of industrial uses on the Project site are provided on Table 6-1.

Table 6-1: Existing Industrial Building Operational Air Quality Emissions

Industrial Operational Activities	Emissions (lbs/day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Summer Scenario						
Total Maximum Daily Emissions	11.14	143.55	48.79	0.45	18.81	6.63
Winter Scenario						
Total Maximum Daily Emissions	10.90	146.09	39.59	0.45	18.74	6.61
SCAQMD Regional Threshold	75	100	550	150	150	55
Threshold Exceeded?	No	Yes	No	No	No	No

Source: Urban Crossroads, 2019.

The No Project/No Build Alternative would avoid the Project's significant impact related to the net increase of a criteria pollutant, as an increase in emissions over the existing condition would not occur. However, operation of the existing industrial buildings at full capacity would also result in an exceedance of a SCAQMD threshold.

Cultural Resources

As determined in Section 5.3, *Cultural Resources*, the existing industrial buildings was constructed in the early 1980s, which are not more than 39 years old and are not historic resources. In addition, the Project site is not adjacent to any historic structures. Therefore, no impacts related to historic resources would occur from implementation of the proposed Project. Section 5.3, *Cultural Resources*, also describes that due to the extent and depth of previous ground disturbances throughout the site, the potential for archaeological resources is

limited. Therefore, the Project would not cause a substantial adverse change in the significance of an archaeological resources; and impacts would be less than significant.

The No Project/No Build Alternative would re-occupy the existing non-historic buildings on the Project site. The alternative would not involve excavation or other construction that has the potential to impact any cultural resources. Thus, the No Project/No Build Alternative would have a reduced potential to impact archaeological resources or human remains, then the less than significant impacts that would result from the proposed Project.

Energy

The proposed Project would result in new residences and commercial buildings that would require energy supplies. The proposed Project would be developed in compliance with the Calgreen/Title 24 requirements related to energy and includes features to reduce energy consumptions, such as 94 electric vehicle charging stations. As described in Section 5.4, *Energy*, the proposed Project would not use large amounts of energy or fuel in a wasteful manner, and impacts would be less than significant.

The No Project/No Build Alternative would re-occupy the existing three light industrial buildings on the Project site, and similar to the proposed Project, this alternative would require energy. The service demand generated by the three light industrial buildings would likely be lower than that of the proposed Project because a 24-hour resident population would not exist. However, the No Project/No Build Alternative would not provide upgraded energy efficient infrastructure, such as electrical, plumbing, and water efficient irrigation. Overall, both the proposed Project and the No Project/No Build Alternative would result in less than significant impacts related to Energy.

Geology and Soils

No new construction activities, including demolition and grading, would occur under the No Project/No Build Alternative. Therefore, there would be no potential for additional workers, building and structures to experience seismic ground shaking, liquefaction, lateral spreading, subsidence, or collapse within the Project site. However, the buildings and structures that exist in the Project site were built before current seismic safety codes; therefore, this alternative, by retaining older buildings and structures, could expose people to greater hazards from strong ground shaking than the proposed Project. Additionally, the Project's impacts to geology and soils were determined to be less than significant with compliance with the California Building Code (CBC). Therefore, the geologic hazard impacts from this alternative would be less than significant, and neutral in comparison to the proposed Project.

In addition, because the No Project/No Build Alternative does not involve grading or other ground disturbance activities, potential impacts to paleontological resources would not occur. Thus, impacts under this alternative would be reduced compared to the less than significant impacts of the proposed Project.

Greenhouse Gas Emissions

As described previously, the proposed Project would result operational GHG emissions that would exceed the SCAQMD Tier 3 screening threshold of 3,000 MTCO₂e and exceed the SCAQMD Tier 4/City CAP threshold of 3.16 MTCO₂e per service population. Approximately 60 percent of the Project's GHG emissions would be generated by mobile sources (vehicle trips), and there are no feasible Project measures that would reduce vehicular emissions. Thus, Project impacts would be significant and unavoidable.

The No Project/No Build Alternative would avoid the majority of short-term construction-related emissions because only tenant improvements could occur under this alternative; and an increase in operational GHG emissions would not occur. Thus, the No Project/No Build Alternative would avoid the Project's significant and unavoidable impact related to the increase in GHG emissions. However, as detailed in Section 5.6,

Greenhouse Gas Emissions, operation of the existing industrial buildings on the Project site at full capacity generates 8,520.07 MT/yr of GHGs, which would exceed the SCAQMD Tier 3 screening threshold of 3,000 MTCO₂e. Therefore, the No Project/No Build Alternative avoid the Project's significant impact related to the net increase of GHG emissions, as an increase in emissions over the existing condition would not occur. However, operation of the existing industrial buildings at full capacity would exceed the SCAQMD Tier 3 screening threshold and because no residents would occur onsite a limited service population would exist; and therefore, it would also exceed the service population threshold.

Hazards and Hazardous Materials

The proposed Project would remove and dispose of approximately 900 cubic yards of contaminated soil during excavation and grading activities. As a result, the Project requires implementation of Mitigation Measure HAZ-1 that provides for a Soil Management Plan to be prepared by a qualified hazardous materials consultant that would detail procedures and protocols for excavation and disposal of onsite hazardous materials. The No Project/No Build Alternative would not require this mitigation because the existing onsite contaminated soils would remain in place. Thus, potential impacts related to removal and disposal of contaminated soils would be avoided by this alternative; however, the contaminated soils would remain on the Project site.

Hydrology and Water Quality

Existing water quality conditions, groundwater supplies, drainage patterns, and runoff water amounts would remain "as is" under the No Project/No Build Alternative because no new development would occur. This alternative would not introduce new sources of water pollutants from either construction on the site or new operations on the site, because no new development or different uses would occur. However, this alternative would not include installation of new low-impact development (LID), source control, site design, and treatment control best management practices (BMPs) to minimize runoff and water pollution, which would occur under the proposed Project. The storm water leaving the site would not be filtered and would continue to contain sediment and other potential pollutants associated with the existing conditions of the site. Therefore, the No Project/No Build Alternative would reduce impacts to hydrology and water quality that would occur from the proposed Project. However, the beneficial improvements would not occur. Overall, hydrology and water quality impacts would be less than significant, and neutral in comparison to the proposed Project.

Land Use and Planning

The Project site has a General Plan Land Use designation of PAO (Professional & Administration Office) and is zoned M-1 (Light Industrial). A General Plan Land Use Amendment and zone change are required to allow for the proposed mixed uses. The Project is requesting to change the General Plan land use designation to District Center (DC) and a zone change to Specific Development (SD). Development of the site for multi-family residential and commercial (retail/restaurant) uses would integrate into the planned development of these adjacent and nearby areas. The site would provide housing for local employees working nearby in Santa Ana, Tustin, and Irvine. The site would also provide commercial retail services and restaurants for onsite residents and employees working nearby. The site would provide both vehicular and pedestrian access and would integrate into the land uses of the area. The proposed land use designation change from PAO to DC would not conflict with a policy or plan adopted for the purpose of avoiding or mitigating an environmental effect. The PAO land use designation does not provide avoidance of an environmental effect and the DC land use designation provides for development flexibility to design a project that could avoid an environmental effect. In addition, the proposed Project would implement many of the SCAG policies related to high-density, infill development, and improvement of the job/housing balance.

The No Project/No Build Alternative would operate the existing industrial buildings on the Project site, which would not require a General Plan Amendment or zoning change. No impacts related to land use and planning

would occur by retention of the existing onsite uses. Because the No Project/No Build Alternative would not include residential uses, it would not require implementation of Mitigation Measure LU-1, which requires resident notification of airport operations and potential annoyances. Because this alternative would not require implementation of mitigation that would be required by the proposed Project, impacts from implementation of this alternative would be less than those of the proposed Project. However, this alternative would not implement the SCAG policies related to high-density, infill development, and improvement of the job/housing balance and corresponding reduction in vehicle miles traveled.

Noise

The proposed Project would result a short-term increase in noise from construction and a long-term increase in noise from operation. The short-term construction noise and vibration impacts would be less than significant; and operation of the Project would also result in less than significant impacts.

The No Project/No Build Alternative would generate noise sources from full re-occupation of the existing light industrial buildings, possible tenant improvements, and vehicular trips to and from the site. However, the number of vehicular trips generated by this alternative would be less than those generated by the proposed Project; hence, traffic noise under this alternative would be less. Also, this alternative would not involve exterior construction related noise and vibration, as only tenant improvements to the existing buildings would occur under this alternative. Additionally, this alternative would not generate a residential population that could be impacted by roadway noise sources. As a result, the No Project/No Build Alternative would avoid potential impacts related to noise; however, like the proposed Project, the noise generated under this alternative would be less than significant, which is the same as the proposed Project.

Population and Housing

The proposed Project would develop 1,150 multi-family residential units that would house approximately 2,081 residents at full occupancy and develop 80,000 square feet of commercial retail/restaurant space that would generate approximately 320 employees at full occupancy, which would be within SCAGs projected growth. In addition, the proposed Project would reduce the jobs-housing balance slightly to 2.05; and to 2.10 in 2040, which would be a beneficial effect of providing multi-family housing on the project site, where employees can easily travel to employment opportunities within the Santa Ana, City of Tustin, and City of Irvine, which are jobs-rich, and a corresponding reduction in vehicle miles traveled would occur.

The No Project/No Build Alternative would re-occupy the existing building. As described in Section 5.11, *Population and Housing*, SCAG projections show that the number of jobs will increase through 2040. The No Project/No Build Alternative would provide three industrial buildings to accommodate employment opportunities for the projected growth in jobs but would not result in a benefit to the jobs housing balance and a corresponding reduction in vehicle miles traveled. Overall, the No Project/No Build Alternative would result in a less than significant impact related to population and housing, which is the same as the proposed Project.

Public Services

The proposed Project would develop 1,150 multi-family residential units that would house approximately 2,081 residents at full occupancy and develop 80,000 square feet of commercial retail/restaurant space that would generate approximately 320 employees at full occupancy, which would require public services, such as fire protection and emergency response, police protection, and schools. However, as described in Section 5.12, *Public Services*, the Project would install security and fire protection systems and there are adequate public service facilities that would be able to meet the service demands of the proposed Project and new or physically altered public service facilities would not be required to serve the proposed Project.

The No Project/No Build Alternative would continue use of the existing light industrial buildings on the Project site, and similar to the proposed Project, the employees onsite would require public services. However, the service demand generated by the existing buildings is lower than that of the proposed Project because a 24-hour resident population associated with the proposed Project would not exist, and the employee population onsite is much less than the number of residents generated by the proposed Project. However, the new security and fire protection features that would be implemented by the proposed Project would not occur by this alternative, and the existing older fire system would remain. Overall, both the proposed Project and the No Project/No Build Alternative would result in less than significant impacts related to public services.

Parks and Recreation

The proposed Project would develop 1,150 multi-family residential units that would house approximately 2,081 residents at full occupancy, which would generate a demand for park and recreation facilities. The proposed Project includes 174,555 square feet of exterior open space recreation area and approximately 8,008 square feet of interior amenities to total 183,363 square feet of recreational and open space onsite. Based on the existing amount of 245.38 acres of existing park and recreation facilities within 3 miles of the Project site, the recreation facilities that would be provided as part of the Project, and the number of residents at full capacity of the proposed Project, the Project would result in less than significant impacts related to parks and recreation.

The No Project/No Build Alternative would continue use of the existing light industrial buildings on the Project site. The employees would generate a much lower demand for park and recreation facilities, than the 24-hour resident population associated with the proposed Project. Therefore, both the proposed Project and the No Project/No Build Alternative would result in less than significant impacts related to parks and recreation.

Transportation

As described in Section 5.14, *Transportation*, the proposed Project would result in an increase of 534 a.m. peak hour trips and 604 p.m. peak hour trips. The addition of these vehicle trips would result in an impact at five intersection locations, which would require implementation of improvements to reduce the impacts to a less than significant level. However, the improvements cannot be guaranteed because they require approval and/or implementation by the City of Tustin or the City of Irvine; or are a result of a cumulative impact in 2040 and there is no currently planned improvement. Therefore, transportation impacts from the Project would remain significant and unavoidable.

However, the proposed Project would implement high-density, infill development, that would improve the job/housing balance and thereby reduce the related vehicle miles traveled. The Project is located near existing employment, services, and retail destinations, and is in proximity to existing public bus stops and freeways, which would result in reduced dependency on cars, time spent in traffic, and more closely link residents to jobs and services in comparison to a project of similar size and land without close access to employment, service, retail, public transit, and freeways. As described in Section 5.11, *Population and Housing*, the Project would assist in improving the jobs to housing balance.

As shown on Table 5.14-5 in Section 5.14, *Transportation*, operation of the existing three light industrial buildings at full capacity would generate 1,326 total vehicle trips, of which 534 are in the a.m. peak hour and 604 in the p.m. peak hour. These are 10,220 fewer vehicular trips per day, 375 fewer a.m. peak hour trips, and 445 fewer p.m. peak hour trips than the proposed Project, which would result in a less than significant impact due to the reduction in trip volume. However, this alternative would not implement high-density, infill development, improve the job/housing balance, or reduce vehicle miles traveled, as under this alternative the site would not provide housing close to the employment center.

Tribal Cultural Resources

The proposed Project involves construction that could result in inadvertent impacts to unknown buried tribal cultural resources. Therefore, the Project requires mitigation to reduce the potential impacts to these resources that could occur during construction. However, the No Project/No Build Alternative would not involve ground disturbance; no excavation or grading would occur. Hence, this alternative would not have the potential to impact unknown buried tribal cultural resources and mitigation is not required. Thus, potential impacts to tribal cultural resources under the No Project/No Build Alternative would be less than the proposed Project.

Utilities and Service Systems

The proposed Project would develop 1,150 multi-family residential units that would house approximately 2,081 residents at full occupancy and develop 80,000 square feet of commercial retail/restaurant space that would generate approximately 320 employees at full occupancy, which would require water, wastewater, drainage, and landfill systems. However, as described in Section 5.16, *Utilities and Service Systems*, the Project would redevelop onsite utilities compliant with the Orange County Drainage Area Management Plan (DAMP) and install LID and CalGreen/Title 24 compliant infrastructure that would connect to the existing infrastructure adjacent to the Project site. Additionally, the existing off-site infrastructure is adequate and would be able to meet the service demands of the proposed Project and new or physically altered utility systems would not be required to serve the proposed Project.

The No Project/No Build Alternative would operate the existing light industrial buildings on the Project site, and similar to the proposed Project, this alternative would require water, wastewater, and landfill services. The service demand generated by the existing light industrial buildings would be lower than that of the proposed Project because fewer people would be onsite and a 24-hour resident population would not exist. However, because the onsite infrastructure would not be redeveloped, LID and CalGreen/Title 24 compliant infrastructure would not be installed. Overall, both the proposed Project and the No Project/No Build Alternative would result in less than significant impacts related to utilities and service systems.

6.6.2 CONCLUSION

Ability to Reduce Impacts

The No Project/No Build Alternative would result in operation of the three existing light industrial buildings on the Project site, and development and operation of 1,150 multi-family residences and 80,000 square feet of retail commercial space would not occur. As a result, the No Project/No Build Alternative would avoid the significant and unavoidable air quality, greenhouse gas, and transportation impacts that would occur from the Project and all of the potential construction impacts. Additionally, operational impacts would be reduced and the mitigation measures that are identified in Chapter 5.0 of this EIR would not be required, which include measures related to hazards and hazardous materials, land use and planning, transportation and tribal cultural resources. However, the environmental benefits of the Project would also not be realized, such as improvements to storm water quality, removal of contaminated soils, improvements to the jobs/housing balance, and the potential to reduce vehicle miles traveled. The No Project/No Build Alternative would not install storm water filtration features in accordance with DAMP and LID design guidelines that would filter and slow the volume and rate of runoff; the contaminated soils would remain onsite; and this alternative would provide for the projected employment growth but would not improve the jobs to housing balance within the region and could generate more vehicle miles traveled.

Ability to Achieve Project Objectives

As shown in Table 6-8, the No Project/ No Build Alternative would not meet any of the Project objectives. The site would not be redeveloped to provide housing to help meet the region's demand for housing, would not provide a development consistent with other regional redevelopment in the Tustin Legacy Specific Plan

and IBC, would not develop housing to assist the City in meeting its jobs/housing balance, would not provide onsite uses that reduce VMT, and would not implement SCAG RTP/SCS policies related to providing additional housing near employment centers. Overall, this alternative would not meet any of the objectives of the proposed Project.

6.7 ALTERNATIVE 2: REDUCED PROJECT ALTERNATIVE

Under this alternative, a reduction in the number of residential units and commercial square footage would be built, which would result in increased setbacks and reduced building heights. Pursuant to discussion with City planning staff, it was determined that a reasonable decrease in developed on the Project site is 30 percent of each unit type and a 30 percent reduction in commercial retail space resulting in 345 fewer residential units and 24,000 square feet less of commercial space. Like the proposed Project, 17 percent of the units would be studios, 52 percent would be one-bedroom units, and 29 percent would be 2-bedroom units. This alternative would develop and operate 805 multi-family residential units and 56,000 square feet of retail and restaurant commercial uses.

Reducing these units from the proposed Project would eliminate 100 units from each of the three proposed mixed use buildings and 45 units from the residential only building, which would reduce the height of the three six-story mixed use buildings by two stories and reduce the height of the one five-story building by one story. Thus, each of the mixed-use and residential buildings would be four-stories in height under the Reduced Project Alternative.

To support the Reduced Project Alternative, parking spaces would be provided at the same rate as the proposed Project of 1.7 spaces per residential unit and 5 spaces per 1,000 square feet of commercial space within a two four-level parking structures and two five-level parking structures, which would each be two levels lower than the proposed Project. The 24,000 square foot reduction in commercial space would occur from reducing the Phase 1 commercial square footage from 40,000 square feet to 20,000 square feet and from reducing the Phase 3 commercial square footage from 20,000 square feet to 16,000 square feet.

Under the Reduced Project Alternative, the recreation amenities would also be reduced by 30 percent; thus, approximately 122,189 square feet of exterior open space recreation area and approximately 5,606 square feet of indoor amenities would be provided by this alternative.

Like the proposed Project, this alternative would require a General Plan Amendment from the existing land use designation of PAO (Professional and Administrative Office) to District Center (DC), and a Zone change from M-1 (Light Industrial) to a Specific Development (SD) designation.

6.7.1 ENVIRONMENTAL IMPACTS

Aesthetics

The Reduced Project Alternative would result in a mixed-use development that would be lower in height and visual density than the proposed Project. Views of the Project site would change from views of five- and six-story mixed-use buildings to those of four-story mixed-use buildings. Views of the six- and seven-level parking structures would change to views of four- and five level-parking structures. The proposed parking structures would each be two levels lower than the proposed Project, which would reduce the urban density of views of the site. Similarly, the 24,000 square foot reduction in commercial space would reduce the visual density of the commercial uses on site.

Under the Reduced Project Alternative, the four-story mixed-use buildings and four- and five-level parking structures would be set behind landscaping trees that would be similar to that proposed by the Project. The change in views of the Project site from Red Hill Avenue and Warner Avenue under this alternative would result in a lower visually dense urban environment compared to the proposed Project. Similar to the proposed Project, the four-story urban structures under the Reduced Project Alternative would change setback views of urban structures to forefront views of mixed-use structures that would dominate views. However, the views of the Reduced Project Alternative would be lower in height and visually less dense than that of the proposed Project. Thus, under this alternative, the development would be reduced in visual scale and height compared to the proposed Project.

The Reduced Project Alternative would have a modern and mixed-use character that is consistent with the proposed Project and would be visually compatible with the existing and future built environment in the Project area. Section 5.1, *Aesthetics*, describes that development across from Red Hill Avenue from the Project site is within the Tustin Legacy Specific Plan and is planned for development that could be up to six-stories and 70-feet in height, which would also to be consistent with the visual character of this alternative.

Although the Reduced Project Alternative would also reduce exterior recreation amenities by 30 percent, the development would be located on the same site; therefore, additional open space area may occur as a result of the reduction of building square footage and developed recreation amenities. Overall, views of the Project site would be visually less dense and structure heights would be lower with implementation of the Reduced Project Alternative. However, both the Reduced Project Alternative and the proposed Project would result in less than significant impacts related to visual character and quality.

Additionally, both the proposed Project and the Reduced Project Alternative would introduce additional sources of light and glare that would result in similar less than significant impacts with implementation of the City's existing Municipal Code lighting regulations that require lights to be directed and shielded away from adjacent land uses to prevent light from shining onto adjacent properties. In addition, exterior building materials would consist of stucco, concrete, stone veneer, and other similar materials that do not have highly reflective surfaces. Therefore, lighting and glare related impacts would be similar and less than significant under both the proposed Project and the Reduced Project Alternative.

Air Quality

The Reduced Project Alternative would reduce the amount and length of construction activities compared to the proposed Project, which in turn would result in less overall construction-related air quality emissions. Also, as the number of residential units and commercial square footage would be reduced by 30 percent under this alternative and the size of the proposed structures are smaller, less building and architectural coating activities would be needed than those of the proposed Project. However, the demolition, site preparation, grading, drainage/utilities/subgrade, and paving phases would include the entire site; and therefore, would have the same level of maximum daily emissions, which were determined to be less than significant, as detailed in Section 5.2, *Air Quality*. Thus, like the proposed Project, the Reduced Project Alternative would result in less than significant construction impacts related to air quality.

As detailed in Table 5.2-8, in Section 5.2, *Air Quality*, operation of the Project would result in 65.33 lbs/day of VOC emissions, which is 15.33 lbs/day over the SCAQMD regional threshold of 55 lbs per day. The VOC emissions would be derived from consumer products and vehicle trips. However, as detailed in Table 6-2 below, the Reduced Project Alternative would result in 3,955 fewer daily vehicular trips than the proposed Project, resulting in fewer vehicular emissions. In addition, the Reduced Project Alternative would include 345 fewer residential units and 24,000 square feet less of commercial space. This reduction in residential units, square footage of commercial space, and daily vehicular trips would result in reducing VOC emissions by

over 15.33 lbs/day. Thus, daily operational emissions from the Reduced Project Alternative would not exceed SCAQMD thresholds and would result in less than significant operational air quality impacts. Therefore, the Reduced Project Alternative would generate less overall air quality emissions than the proposed Project and would reduce the significant and unavoidable impact from the proposed Project to a less than significant level.

Cultural Resources

The Reduced Project Alternative would develop fewer residential units and less commercial space than the proposed Project; but would require the same site preparation, grading, drainage/utilities/subgrade, which would disturb site soils to the same extent as the proposed Project. However, as described previously, the Project site does not contain any historic resources and due to the extent and depth of previous ground disturbances throughout the site, the potential for archaeological resources or human remains to exist onsite is limited. Therefore, similar to the proposed Project, this alternative would result in a less than significant impact related to cultural resources. Further, like the Project, in the unanticipated event that human remains are found during construction activities compliance with California Health and Safety Code Section 7050.5 would ensure that human remains are treated with dignity and as specified by law and provide that the impact is less than significant.

Energy

The Reduced Project Alternative would redevelop the Project site to provide multi-family residential units and commercial uses that would require energy supplies. Like the proposed Project, the Reduced Project Alternative would be developed in compliance with the Calgreen/Title 24 requirements related to energy and would include similar features to reduce energy consumptions, such as electric vehicle charging stations. As described in Section 5.4, *Energy*, the proposed Project would not use large amounts of energy or fuel in a wasteful manner. Because the Reduced Project Alternative would result in 30 percent fewer residential units and 30 percent less commercial square footage and would implement the same energy efficient infrastructure, this alternative would demand less energy. However, both impacts of the proposed Project and the Reduced Project Alternative would not use large amounts of energy or fuel in a wasteful or inefficient manner and impacts in both conditions would be less than significant.

Geology and Soils

Grading and development of the Project area would still occur under the Reduced Intensity Alternative, and therefore, impacts to geology and soils would be similar to those that would be generated from the proposed Project. The new structures under this alternative would still result in additional persons and structures in the Project area that would be subject to risks associated with seismic ground shaking and geologic hazards. Therefore, the Reduced Intensity Alternative would be required to meet the same regulatory requirements as the proposed Project. Therefore, impacts to geology and soils would be less than significant, which is the same as the proposed Project.

The Reduced Intensity Alternative would result in a similar potential to adversely affect any paleontological resources on the Project site as the proposed Project, despite the reduction in development size. However, like the proposed Project, the potential of paleontological resources to exist onsite is limited due to the previous extensive ground disturbance of the Project site. Thus, like the proposed Project, potential impacts to paleontological resources would also be less than significant.

Greenhouse Gas Emissions

The Reduced Project Alternative would reduce the amount and length of construction activities compared to the proposed Project, which in turn would result in less overall construction related GHG emissions. In addition, the Reduced Project Alternative would generate fewer emissions from operation of residential units and

commercial space because 30 percent fewer residences and 30 percent less commercial square footage would be developed compared to the proposed Project. The Reduced Project Alternative would also result in 3,955 fewer daily vehicular trips. Therefore, the Reduced Project Alternative would generate less GHG emissions than the proposed Project.

The net increase in GHG emissions that would be generated from the operation of the proposed Project is 9,861.60 CO₂e per year (as shown in Table 5.6-3). Under the Reduced Intensity Alternative GHG emissions would be approximately 30 percent less, which would be approximately 6,903.12 CO₂e per year. Therefore, the overall volume of GHG emissions would be reduced in comparison to the proposed Project. However, the volume of GHG emissions would exceed the SCAQMD Tier 3 screening threshold of 3,000 MTCO₂e. Additionally, the alternative's net increase in GHG emissions of 6,903.12 MTCO₂e per year divided by the service population of the Project (1,457 residents + 224 employees) would result in 4.10 MTCO₂e annually per service population, which exceeds the threshold of 3.16 MTCO₂e per service population. Therefore, although less emissions would occur, significant and unavoidable impacts related to GHG emissions would still occur from operation of the Reduced Intensity Alternative and impacts under this alternative would be the same as the proposed Project.

Hazards and Hazardous Materials

The demolition, site preparation, grading, drainage/utilities/subgrade, and paving phases that would be needed to develop the Reduced Project Alternative would include the entire site; and therefore, like the proposed Project it would require removal and disposal of contaminated soils during excavation and grading activities. As a result, this alternative would require implementation of Mitigation Measure HAZ-1 to ensure that the contaminated soils are removed and disposed of appropriately. This measure would be required for both the proposed Project and the Reduced Project Alternative to reduce potential impacts to a less than significant level.

In addition, the Reduced Project Alternative would result in similar less than significant hazard impacts related to operations at John Wayne Airport (JWA). JWA is located 2.2 miles southwest of the Project site within the Airport Environs Land Use Plan (AELUP) Notification Area, but is not the Airport Safety Zone, the Airport Impact Zone, and is outside of the 60 CNEL noise contours, as shown in Section 5.7, *Hazards and Hazardous Materials* (Figures 5.7-2 and 5.7-3). The Reduced Project Alternative would result in four-story buildings, which are lower than the six-story buildings proposed by the Project. Both the proposed Project and the Reduced Project Alternative would result in similar less than significant impacts related to JWA operational hazards. Therefore, impacts related to hazards and hazardous materials from the Reduced Project Alternative would be neutral in comparison to the proposed Project.

Hydrology and Water Quality

The Reduced Project Alternative would result in similar construction impacts compared to the proposed Project because similar construction activities and soil disturbances would occur. As a result, the Reduced Project Alternative would implement standard BMPs through the City's standard permitting process to reduce potential impacts related to water quality during construction, which is similar to the proposed Project. Therefore, construction related hydrology and water quality impacts from the Reduced Project Alternative would be similar to those of the proposed Project.

The Reduced Project Alternative may result in a reduction of the total area of impervious surfaces compared to the Project. However, like the proposed Project, this alternative would introduce new sources of water pollutants from construction and operation activities. Additionally, this alternative would be required to include onsite drainage, LID, source control, site design, and treatment control BMPs that are similar to those included in the proposed Project. Therefore, the Reduced Project Alternative would result in impacts to

hydrology and water quality that are similar to those that would occur from the proposed Project. Overall, hydrology and water quality impacts would be less than significant, and neutral in comparison to the proposed Project.

Land Use and Planning

The Reduced Project Alternative would implement multi-family housing and retail/restaurant commercial land uses on the Project site, and like the proposed Project would require a General Plan Land Use Amendment and zone change to allow for the mixed-uses. Similar to the Project, the Reduced Project Alternative would provide the same land uses that would integrate into the planned development of these adjacent and nearby areas. However, the reduced development would provide fewer housing opportunities for local employees and fewer retail services and restaurants for onsite residents and employees working nearby. Therefore, the Reduced Project Alternative would implement many of the SCAG policies related to high-density, infill development, and improvement of the job/housing balance to a lesser degree than the proposed Project.

In addition, because the Reduced Project Alternative would result in an onsite residential population, the alternative would require implementation of Mitigation Measure LU-1, which requires resident notification of airport operations and potential annoyances. The Reduced Project Alternative would develop similar uses that would be less dense, and two-stories lower in height than the proposed Project. Like the proposed Project, the Reduced Project Alternative would be consistent with the JWA AELUP with implementation of Mitigation Measure LU-1. As a result, the proposed Project and the Reduced Project Alternative would have similar less than significant impacts after implementation of mitigation.

Noise

The Reduced Project Alternative would reduce the amount and length of construction activities compared to the proposed Project, which in turn would result in less overall construction-related noise and vibration. Thus, like the proposed Project construction noise and vibration impacts would be less than significant under the Reduced Project Alternative.

The Reduced Project Alternative would generate noise sources from vehicular trips to and from the site and operation of onsite exterior uses and mechanical equipment. However, the number of vehicular trips generated by this alternative would be less than those generated by the proposed Project; hence, traffic noise under this alternative would be less. Also, the number and type of mechanical systems needed for the Reduced Project Alternative would be similar to those used for the proposed Project. Thus, like the proposed Project, the noise generated under this alternative would be less than significant.

Population and Housing

The Reduced Project Alternative would reduce the number of residential units on the site by 30 percent of each unit type and reduce the commercial square footage by 30 percent. Thus, this alternative would develop and operate 805 multi-family residential units and 56,000 square feet of retail and restaurant commercial uses. Thus, like the proposed Project 17 percent of the units would be studios, 52 percent would be one-bedroom units, and 29 percent would be 2-bedroom units.

This would result in approximately 1,457 residents at full occupancy, versus the proposed Project's 2,081 residents at full occupancy of the proposed Project, which is a reduction of 624 residents. The reduction in commercial square footage would result in 224 employees, which would be a 96-employee reduction over the Project's employment of 320 at full occupancy. The reduction in residential units and commercial space by the Reduced Project Alternative would be within SCAGs projected growth, like the proposed Project, but would provide less housing near an employment center and less benefit to the jobs-housing balance. Thus, both the Reduced Project Alternative and the proposed Project would result in less than significant impacts

related to population and housing; however, the Reduced Project Alternative would result in a reduced beneficial impact by providing fewer multi-family housing units, where fewer employees can travel to local employment opportunities in the jobs-rich area. Reducing the number of residential units on the Project site, as would be done by the Reduced Project Alternative would incrementally reduce the jobs-housing balance.

Public Services

As described above, under the Reduced Project Alternative, the Project site would be redeveloped to provide 805 multi-family residential units and 56,000 square feet of retail and restaurant commercial uses. Like the proposed Project, this alternative would install security and fire protection systems, and because a new residential and employee population would exist on the Project additional calls for fire and police services would occur. Likewise, the residential population would generate students that would utilize local schools. As the population size associated with the Reduced Project Alternative would also be 30 percent is lower than the proposed Project, this alternative would result in a lower demand for public services, including fire, police, and schools. Because the Project would result in less than significant impacts to public services, the smaller Reduced Project Alternative would also result in less than significant impacts. Thus, overall impacts are the same.

Parks and Recreation

The Reduced Project Alternative would reduce the onsite recreation amenities by 30 percent. The 1,457 residents at full occupancy would utilize the 122,189 square feet of exterior open space/recreation area and approximately 5,606 square feet of indoor amenities that would be provided by the Reduced Project Alternative. As the population size associated with the Reduced Project Alternative would be reduced by 30 percent, consistent with the reduction in park and recreation amenity, the ratio of residents per area of parkland provided by the Reduced Project Alternative would be the same as the proposed Project. Also, because, the number of residents would be less under this alternative, it would result in an incrementally lower demand for off-site parks and recreation facilities. Therefore, both the proposed Project and the Reduced Project Alternative would result in less than significant impacts related to parks and recreation; thus, overall impacts are the same.

Transportation

As described previously, the proposed Project would result in an increase of 11,546 daily vehicular trips, including 534 a.m. peak hour trips and 604 p.m. peak hour trips. This increase in vehicle trips would require implementation of improvements to reduce the impacts to a less than significant level. However, the improvements cannot be guaranteed because they require approval and/or implementation by the City of Tustin or the City of Irvine; or are a result of a is a cumulative impact in 2040 and there is no currently planned improvement. Therefore, impacts from the Project would remain significant and unavoidable.

The Reduced Project Alternative would decrease the number of residential units and commercial space by 30 percent compared to the proposed Project. This would result in development of 805 multi-family residential units and a total of 56,000 square feet of commercial retail and restaurant space. As shown on Table 6-2, the Reduced Project Alternative would generate 3,955 fewer daily vehicular trips than the proposed Project, resulting in 243 fewer a.m. peak hour trips and 281 fewer p.m. peak hour trips.

Table 6-2: Trip Comparison Reduced Project Alternative

	Daily	AM Peak Hour			PM Peak Hour		
		In	Out	Total	In	Out	Total
Proposed Project	11,546	155	379	534	437	167	604
Reduced Project Alternative	7,591	56	235	291	267	56	323

Decrease in Trips	-3,955	-99	-144	-243	-170	-111	-281
-------------------	--------	-----	------	------	------	------	------

Source: EPD 2019.

As shown in Table 6-3, with implementation of the Reduced Project Alternative, impacts at three out of the five intersections would be reduced to a less than significant level. However, due to the volume of cumulative trips in combination with the Project, an impact would continue to occur at the intersections of Grand Avenue / Warner Avenue (#4) and Red Hill Avenue/ Barranca Parkway (#30) in the year 2040 with implementation of the Reduced Project Alternative. Therefore, implementation of this alternative would reduce some of the impacts from the Project; however, a significant and unavoidable impact would continue to occur.

Table 6-3: Comparison of Reduced Project Alternative Year 2040 LOS at Project Impacted Locations

Intersection		Year 2040 PM Peak		Year 2040 plus Project PM Peak		V/C Change	Impact?
		V/C or Delay	LOS	V/C or Delay	LOS		
Year 2040 Plus Proposed Project							
4.	Grand Ave./ Warner Ave.	1.018	F	1.051	F	0.033	Yes
25.	Red Hill Ave./Warner Ave.	0.794	C	0.908	E	0.114	Yes
30.	Red Hill Ave./ Barranca Pkwy.	0.959	E	1.032	F	0.073	Yes
32.	Red Hill Ave./ Alton Pkwy.	1.011	F	1.037	F	0.026	Yes
47.	Tustin Ranch Rd./ Warner Ave. N	1.006	F	1.016	F	0.010	Yes
Year 2040 Plus Reduced Project Alternative							
4.	Grand Ave./ Warner Ave.	1.018	F	1.037	F	0.019	Yes
25.	Red Hill Ave./Warner Ave.	0.794	C	0.847	D	0.053	No
30.	Red Hill Ave./ Barranca Pkwy.	0.959	E	1.003	F	0.044	Yes
32.	Red Hill Ave./ Alton Pkwy.	1.011	F	1.028	F	0.017	No
47.	Tustin Ranch Rd./ Warner Ave. N	1.006	F	1.012	F	0.006	No

Source: EPD 2019.

Tribal Cultural Resources

The Reduced Project Alternative would require site preparation, grading, drainage/utilities/subgrade, which would disturb site soils to the same extent as the proposed Project; and therefore, this alternative would require implementation of Mitigation Measure TCR-1 to reduce potential impacts related to unknown buried tribal cultural resources. Thus, impacts under both the Reduced Project Alternative and the proposed Project would be reduced to a less than significant level with incorporation of mitigation.

Utilities and Service Systems

The Reduced Project Alternative would redevelop the Project site to provide mixed uses. Like the proposed Project, this alternative would include redevelopment of the onsite utilities compliant with the Orange County DAMP and install LID and CalGreen/Title 24 compliant infrastructure that would connect to the existing infrastructure adjacent to the site. However, this alternative would result in a lower demand for water supplies, wastewater treatment, and landfill capacity because 30 percent fewer residential units and square footage of commercial space would be developed. As described previously, the existing off-site infrastructure is adequate and would be able to meet the service demands of the proposed Project. Therefore, it would also be able to meet the needs of 30 percent fewer residential units and 30 percent less commercial space. Thus, impacts to utilities and service systems would be less than significant under both the proposed Project and the Reduced Project Alternative.

6.7.2 CONCLUSION

Ability to Reduce Impacts

The Reduced Project Alternative would result in 345 fewer residential units and 24,000 square feet less of commercial space, which would result in 3,955 fewer daily vehicular trips than the proposed Project. The reduction in vehicular emissions and consumer products from this alternative would reduce operational air quality impacts to a less than significant level. However, significant and unavoidable impacts related to greenhouse gas emissions and transportation would continue to occur from implementation of this alternative. Additionally, the mitigation required for implementation of the proposed Project would continue to be required for the Reduced Project Alternative to reduce impacts related to hazards and hazardous materials, land use and planning, and tribal cultural resources to a less than significant level. Overall, although the volume of impacts would be less by the Reduced Project Alternative in comparison to the proposed Project, the Reduced Project Alternative would not eliminate all of the significant and unavoidable impacts of the proposed Project or eliminate the need for mitigation. Furthermore, the Reduced Project Alternative would result in a reduced beneficial impact. Providing fewer multi-family units and less commercial space on the Project site would result in fewer opportunities to improve the jobs-housing balance as fewer residents would have the potential to travel to local employment opportunities.

Ability to Achieve Project Objectives

As shown in Table 6-8, the Reduced Project Alternative would meet the Project objectives, but not to the same extent as the proposed Project. The site would not be redeveloped to provide housing to help meet the region's demand for housing, would provide a development consistent with other regional redevelopment in the Tustin Legacy Specific Plan and IBC. However, fewer residential units and less commercial space would be provided and a reduced improvement to the jobs-housing balance and VMT would occur. Additionally, the alternative would result in less implementation of SCAG RTP/SCS policies related to providing additional housing near employment centers. Overall, this alternative would meet the objectives of the proposed Project, but not to the same extent as the proposed Project.

6.8 ALTERNATIVE 3: BUILD OUT OF THE EXISTING LAND USE AND ZONING ALTERNATIVE

The Project site has a General Plan Land Use designation of Professional and Administrative Office (PAO) with a designated Floor Area Ratio (FAR) of 0.5 and is zoned Light Industrial (M-1). Under this alternative, the Project site would be redeveloped for a new light industrial business park as allowed by the existing General Plan Land Use designation and the City's Zoning Code Sections 41-472 through 41-483. The Project site has a zoning designation of Light Industrial (M-1), which permits uses such as: warehousing, distribution, manufacture, assembly, and storage. The M-1 zone allows buildings up to 3-stories or 35-feet in height.

At the allowable 0.5 FAR, the 14.58-acre site would provide for approximately 317,552 square feet of light industrial building space and building heights of up to 35-feet. These buildings would require approximately 635 parking spaces (per Municipal Code Section 41-1390 requirement of 2 spaces per 1,000 square feet). The industrial buildings would be surrounded by drought tolerant ornamental landscaping.

Under this alternative, the existing onsite development would be demolished, removed, and replaced to provide new building structures that would be developed pursuant to current building requirements, such as energy efficient power systems, drought tolerant landscaping, storm water filtration, and other Low Impact Development (LID) requirements.

6.8.1 ENVIRONMENTAL IMPACTS

Aesthetics

The Build Out of the Existing Zoning Alternative would redevelop the Project site with new light industrial uses that would be three-stories (35-feet in height) which is less than the proposed six-story buildings that would be 94-feet in height. At the allowable 0.5 FAR, the industrial buildings would be 317,552 square feet in size and would require approximately 635 parking spaces. The buildings and associated parking would cover a majority of the Project site and would be visually denser than views of the existing site; but the structures developed under this alternative would be smaller in size than the proposed structures.

This alternative would renovate the site and retain the industrial visual character of the site by constructing new light industrial buildings, which would have loading dock areas, parking, and limited landscaping around building frontages and parking areas. This would provide a similar character to what currently exists onsite. Although the visual character and quality of the Project site would be different than the proposed Project, impacts related to the visual character or quality of the site would be less than significant, which is the same as what would occur by the proposed Project.

Additionally, both the proposed Project and the Build Out of the Existing Zoning Alternative would introduce additional sources of light and glare that would result in similar less than significant impacts with implementation of the City's existing Municipal Code lighting regulations that require lights to be directed and shielded away from adjacent land uses to prevent light from shining onto adjacent properties. In addition, exterior building materials would consist of stucco, concrete, stone veneer, and other similar materials that do not have highly reflective surfaces. Therefore, lighting and glare related impacts would be similar and less than significant under both the proposed Project and the Build Out of the Existing Zoning Alternative.

Air Quality

The Build Out of the Existing Land Use and Zoning Alternative would require a similar amount, type, and length of construction activities as the proposed Project, which in turn would result in similar construction-related air quality emissions. Also, the demolition, site preparation, grading, drainage/utilities/subgrade, and paving phases would include the entire site; and therefore, would have the same level of maximum daily emissions. Thus, like the proposed Project, the Build Out of the Existing Land Use Zoning Alternative would result in less than significant impacts related to construction emissions.

However, operation of the Build Out of the Existing Land Use and Zoning Alternative would result in substantially fewer daily vehicular trips than the proposed Project (as described in the traffic discussion below); and therefore, would result in substantially less daily vehicular emissions than the proposed Project. As described previously and detailed in Table 5.2-8, in Section 5.2, *Air Quality*, operation of the Project would result in 65.33 lbs/day of VOC emissions, which is 15.33 lbs/day over the SCAQMD regional threshold of 55 lbs per day. The VOC emissions would be derived from consumer products and vehicle trips. However, as detailed in Table 6-5 below, the Build Out of the Existing Land Use and Zoning Alternative would result in 9,559 fewer daily vehicular trips than the proposed Project, resulting in fewer vehicular emissions. This reduction would result in reducing VOC emissions by over 15.33 lbs/day. Thus, daily operational emissions from the Build Out of the Existing Land Use and Zoning Alternative would not exceed SCAQMD thresholds and would result in less than significant operational air quality impacts. Therefore, the Build Out of the Existing Land Use and Zoning Alternative would generate less overall air quality emissions than the proposed Project and would reduce the significant and unavoidable impact from the proposed Project to a less than significant level.

Cultural Resources

Similar to the proposed Project, the Build Out of the Existing Land Use and Zoning Alternative would change the site by removing the existing buildings and would require the same site preparation, grading, drainage/utilities/subgrade, which would disturb site soils to the same extent as the proposed Project. However, as described previously, the Project site does not contain any historic resources and due to the extent and depth of previous ground disturbances throughout the site, the potential for archaeological resources or human remains to exist onsite is limited. Therefore, similar to the proposed Project, this alternative would result in a less than significant impact related to cultural resources. Further, in the unanticipated event that human remains are found during construction activities compliance with California Health and Safety Code Section 7050.5 would ensure that human remains are treated with dignity and as specified by law and provide that the impact is less than significant. Thus, both the proposed Project and the Build Out of the Existing Land Use and Zoning Alternative would result in less than significant impacts.

Energy

The Build Out of the Existing Land Use and Zoning Alternative would redevelop the Project site to provide 317,552 square feet of light industrial building space that would require energy supplies. Like the proposed Project, the Build Out of the Existing Land Use and Zoning Alternative would be developed in compliance with the Calgreen/Title 24 requirements related to energy and is not anticipated to use large amounts of energy in a wasteful or inefficient manner. Thus, both the proposed Project and the Build Out of the Existing Land Use and Zoning Alternative would not use large amounts of energy or fuel in an inefficient or wasteful manner, and impacts would be less than significant.

Geology and Soils

Grading and development of the Project area would still occur under the Build Out of the Existing Land Use and Zoning Alternative, and therefore, impacts to geology and soils would be similar to those that would be generated from the proposed Project. The new structures under this alternative would still result in additional persons and structures in the Project area that would be subject to risks associated with seismic ground shaking and geologic hazards. Therefore, the Build Out of the Existing Zoning Alternative would be required to meet the same regulatory requirements as the proposed Project. Therefore, impacts to geology and soils would be less than significant, which is the same as the proposed Project.

The Build Out of the Existing Land Use and Zoning Alternative would result in a similar potential to adversely affect any paleontological resources on the Project site as the proposed Project. However, like the proposed Project, the potential of paleontological resources to exist onsite is limited due to the previous extensive ground disturbance of the Project site. Thus, like the proposed Project, potential impacts to paleontological resources would also be less than significant.

Greenhouse Gas Emissions

The Build Out of the Existing Land Use and Zoning Alternative would require a similar amount, type, and length of construction activities as the proposed Project, which in turn would result in similar construction related GHG emissions. However, operation of the Build Out of the Existing Land Use and Zoning Alternative would result in substantially fewer daily vehicular trips than the proposed Project (as described in the traffic discussion below); and therefore, would result in substantially less daily vehicular related GHG emissions than the proposed Project.

The net increase in GHG emissions that would be generated from the operation of the proposed Project is 9,861.60 CO_{2e} per year (as shown in Table 5.6-3). Under the Build Out of the Existing Land Use and Zoning Alternative GHG emissions would be approximately 4,234.74 CO_{2e} per year. Therefore, the overall volume of GHG emissions would be reduced in comparison to the proposed Project. However, the volume of GHG

emissions would exceed the SCAQMD Tier 3 screening threshold of 3,000 MTCO_{2e}. Additionally, the alternative's net increase in GHG emissions of 4,234.74 MTCO_{2e} per year divided by the service population of the Project (0 residents + 334 employees, as determined below in the population and housing discussion) would result in 12.68 MTCO_{2e} annually per service population, which exceeds the threshold of 3.16 MTCO_{2e} per service population. Therefore, although less emissions would occur, significant and unavoidable impacts related to GHG emissions would still occur from operation of the Build Out of the Existing Land Use and Zoning Alternative and impacts under this alternative would be the same as the proposed Project.

Hazards and Hazardous Materials

The demolition, site preparation, grading, drainage/utilities/subgrade, that would be needed to develop the Build Out of the Existing Land Use and Zoning Alternative would include the entire site; and therefore, like the proposed Project it would require removal and disposal of contaminated soils during excavation and grading activities. As a result, this alternative would require implementation of Mitigation Measure HAZ-1 to ensure that the contaminated soils are removed and disposed of appropriately. This measure would be required for both the proposed Project and the Build Out of the Existing Land Use and Zoning Alternative to reduce potential impacts to a less than significant level.

In addition, the Build Out of the Existing Land Use and Zoning Alternative would result in similar less than significant hazard impacts related to operations at JWA. The Build Out of the Existing Land Use and Zoning Alternative would result in buildings that are three-stories (35-feet in height), which is less than the proposed six-story buildings that would be 94-feet in height. Both the proposed Project and the Build Out of the Existing Land Use and Zoning Alternative would result in similar less than significant impacts related to JWA operational hazards. Therefore, impacts related to hazards and hazardous materials from the Build Out of the Existing Land Use and Zoning Alternative would be neutral in comparison to the proposed Project.

Hydrology and Water Quality

The Build Out of the Existing Land Use and Zoning Alternative would result in similar construction impacts compared to the proposed Project because similar construction activities and soil disturbances would occur. As a result, the Build Out of the Existing Land Use and Zoning Alternative would implement standard BMPs through the City's standard permitting process to reduce potential impacts related to water quality during construction, which is similar to the proposed Project. Therefore, construction related hydrology and water quality impacts from the Build Out of the Existing Land Use and Zoning Alternative would be similar to those of the proposed Project.

The Build Out of the Existing Land Use and Zoning Alternative would result in similar areas of impervious surfaces compared to the Project. Also, like the proposed Project, this alternative would introduce new sources of water pollutants from construction and operation activities. Additionally, this alternative would be required to include onsite drainage, LID, source control, site design, and treatment control BMPs that are similar to those included in the proposed Project. Therefore, the Build Out of the Existing Land Use and Zoning Alternative would result in impacts to hydrology and water quality that are similar to those that would occur from the proposed Project. Overall, hydrology and water quality impacts would be less than significant, and neutral in comparison to the proposed Project.

Land Use and Planning

The Build Out of the Existing Land Use and Zoning Alternative would implement the existing General Plan land use and zoning designations for the Project site and would not require a General Plan amendment or zoning change. Therefore, this alternative would be consistent with the SCAG RTP/SCS, City's General Plan, and zoning code.

Because the Build Out of the Existing Land Use and Zoning Alternative would not include residential uses, it would not require implementation of Mitigation Measure LU-1, which requires resident notification of airport operations and potential annoyances. Because this alternative would not require implementation of mitigation that would be required by the proposed Project, impacts from implementation of this alternative would be less than those of the proposed Project. However, this alternative would not implement the SCAG policies to the same degree as the proposed Project, because this alternative would not locate new housing near existing jobs and reduce the jobs-housing ratio or the corresponding reduction in vehicle miles traveled.

Noise

The Build Out of the Existing Land Use and Zoning Alternative would require a similar amount, type, and length of construction activities as the proposed Project, which in turn would result in similar construction-related noise similar construction-related noise and vibration. Thus, like the proposed Project construction noise and vibration impacts would be less than significant.

Compared to the proposed residential and commercial retail uses that would be operated by the Project, the Build Out of the Existing Land Use and Zoning Alternative would include various light industrial uses (e.g., warehousing, manufacturing, packaging or distribution, service stations, etc.) that typically involve large vehicles and truck trips and operation of these uses may involve machinery or other activities that generally results in higher operational noise levels. Thus, the light industrial uses under the Build Out of the Existing Land Use and Zoning Alternative are anticipated to generate higher traffic noise levels due to the use of larger fleet mix vehicles (e.g., medium and heavy trucks) than the proposed Project. However, the site is not adjacent to sensitive receptors. Therefore, although noise impacts related to a substantial permanent increase in the ambient noise levels from trucks would be greater under the Build Out of the Existing Land Use and Zoning Alternative than the proposed Project, sensitive receivers would not be impacted. Therefore, like the proposed Project, noise under the Build Out of the Existing Land Use and Zoning Alternative would be less than significant.

Population and Housing

The Build Out of the Existing Land Use and Zoning Alternative would not develop housing and would not generate an onsite residential population but would provide for the projected increase in jobs. As described previously and in Section 5.11, *Population and Housing*, SCAG projections show that the number of jobs will increase through 2040. This alternative would provide 317,552 square feet of business park space to accommodate some of the projected increase in jobs. Based upon an employee generation rate of 950 square feet per employee for light industrial uses (SA 2015), this alternative would result in approximately 334 employees at build out. However, this alternative would not assist in improving the jobs housing imbalance and would not provide housing on the Project site, where employees could travel to local employment opportunities within the jobs-rich area. However, both the proposed Project and the Build Out of the Existing Land Use and Zoning Alternative would result in less than significant impacts related to population and housing.

Public Services

As described above, the Build Out of the Existing Land Use and Zoning Alternative would redevelop the Project site into a 317,552 square foot light industrial business park building that would accommodate approximately 334 employees at full capacity. Although this would result in a slight increase in onsite employees, the employee population would not be onsite 24-hours a day, and employees typically generate fewer fire and police service related calls than resident populations. In addition, the new office building would install adequate security systems, and would be required to install OCFA approved fire protection infrastructure. Also, the employees would not generate a substantial increase in student population. Thus,

both the proposed Project and the Build Out of the Existing Land Use and Zoning Alternative would result in less than significant impacts related to public services.

Parks and Recreation

As described previously, the Existing Land Use and Zoning Alternative would not generate a residential population that would require park and recreation services. The 334 onsite employees generated by this alternative would generate a lower demand for park and recreation facilities than a residential population. Although the Build Out of the Existing Land Use and Zoning Alternative would result in a lower demand for parks and recreation than the proposed Project, both would result in less than significant impacts.

Transportation

As described previously, the proposed Project would result in an increase of 11,546 daily vehicular trips, of which there are 534 a.m. peak hour trips and 604 p.m. peak hour trips that would result in significant and unavoidable impacts at five intersections in 2040.

As shown on Table 6-4, based on the ITE trip generation rates, Build Out of the Existing Land Use and Zoning Alternative would generate 1,987 daily trips, of which 235 trips would occur in both the a.m. and p.m. peak hours.

Table 6-4: Trip Generation of the Build Out of the Existing Land Use and Zoning Alternative

Land Use	Units	Daily	AM Peak Hour			PM Peak Hour			
			In	Out	Total	In	Out	Total	
Industrial Park Trip Rates ¹	TSF	3.37	0.32	0.08	0.40	0.08	0.32	0.40	
Total Vehicle Trip Generation									
Alternative 3	317.552	TSF	1,070	103	24	127	27	100	127
Vehicle Mix²		Percent							
Passenger Vehicles		52.80%	565	54	13	67	14	53	67
2-Axle Trucks		4.00%	43	4	1	5	1	4	5
3-Axle Trucks		3.30%	35	3	1	4	1	3	4
4+-Axle Trucks		39.80%	426	41	10	51	11	40	51
		100%	1,069	103	24	127	27	100	127
PCE Trip Generation³		PCE Factor							
Passenger Vehicles		1.0	565	54	13	67	14	53	67
2-Axle Trucks		1.5	64	6	1	8	2	6	8
3-Axle Trucks		2.0	71	7	2	8	2	7	8
4+-Axle Trucks		3.0	1,278	123	29	152	32	120	152
Total PCE Trip Generation			1,978	190	45	235	49	185	235

Source: EPD 2019.

TSF = Thousand Square Feet

PCE = Passenger Car Equivalent

¹ Trip rates from the Institute of Transportation Engineers, Trip Generation, 10th Edition, 2017. Land Use Code 130 - Industrial Park.

² Vehicle Mix from the City of Fontana, Truck Trip Generation Study, August 2003. Classification: Industrial Park.

³ Passenger Car Equivalent (PCE) factors from San Bernardino County CMP, Appendix B - Guidelines for CMP Traffic Impact Analysis Reports in San Bernardino County, 2016

Table 6-5 shows that the Build Out of the Existing Land Use and Zoning Alternative would generate 9,559 fewer daily vehicular trips than the proposed Project, resulting in 299 fewer a.m. peak hour trips and 369 fewer p.m. peak hour trips.

Table 6-5: Trip Comparison of the Project and Build Out of the Existing Land Use and Zoning Alternative

	Daily	AM Peak Hour			PM Peak Hour		
		In	Out	Total	In	Out	Total

Proposed Project	11,546	155	379	534	437	167	604
Existing Land Use and Zoning Alternative	1,987	190	45	235	49	185	235
Change in Trips by the Alternative	-9,559	35	-334	-299	-388	18	-369

Source: EPD 2019.

As shown in Table 6-6, with implementation of the Build Out of the Existing Land Use and Zoning Alternative, impacts at all of the intersections that would be impacted by the proposed Project would be reduced to a less than significant level. Thus, the significant and unavoidable transportation impacts that would result from the proposed Project would not occur by the Build Out of the Existing Land Use and Zoning Alternative.

Table 6-6: Comparison of the Project and Build Out of the Existing Land Use and Zoning Alternative Year 2040 LOS at Project Impacted Locations

Intersection		Year 2040 PM Peak		Year 2040 plus Project PM Peak		V/C Change	Impact?
		V/C or Delay	LOS	V/C or Delay	LOS		
Year 2040 Plus Proposed Project							
4.	Grand Ave./ Warner Ave.	1.018	F	1.051	F	0.033	Yes
25	Red Hill Ave./ Warner Ave.	0.794	C	0.908	E	0.114	Yes
30.	Red Hill Ave./ Barranca Pkwy.	0.959	E	1.032	F	0.073	Yes
32.	Red Hill Ave./ Alton Pkwy.	1.011	F	1.037	F	0.026	Yes
47.	Tustin Ranch Rd./ Warner Ave. N	1.006	F	1.016	F	0.010	Yes
Year 2040 Plus Build Out of the Existing Land Use and Zoning Alternative							
4.	Grand Ave./ Warner Ave.	1.018	F	1.021	F	0.003	No
25	Red Hill Ave./ Warner Ave.	0.794	C	0.795	C	0.001	No
30.	Red Hill Ave./ Barranca Pkwy.	0.959	E	0.961	F	0.002	No
32.	Red Hill Ave./ Alton Pkwy.	1.011	F	1.012	F	0.001	No
47.	Tustin Ranch Rd./ Warner Ave. N	1.006	F	1.007	F	0.001	No

Source: EPD 2019.

Tribal Cultural Resources

The Build Out of the Existing Land Use and Zoning Alternative would require site preparation, grading, drainage/utilities/subgrade, which would disturb site soils to the same extent as the proposed Project; and therefore, this alternative would require implementation of Mitigation Measure TCR-1 to reduce potential impacts related to unknown buried tribal cultural resources. Thus, impacts under both the Build Out of the Existing Land Use and Zoning Alternative and the proposed Project would be reduced to a less than significant level with incorporation of mitigation.

Utilities and Service Systems

The Build Out of the Existing Zoning Alternative would redevelop the Project site to provide a 317,552 square feet of light industrial building space. Like the proposed Project, this alternative would include redevelopment of the onsite utilities compliant with the Orange County DAMP and install LID and CalGreen/Title 24 compliant infrastructure that would connect to the existing infrastructure adjacent to the site. However, this alternative would result in a lower demand for water supplies, wastewater treatment, and landfill capacity because residential uses, that includes a 24-hour population and involves bathing, laundry, dishwashing, pools, and spas require a greater volume of water and generate more wastewater and solid waste than the a 317,552 square feet of light industrial uses.

As described previously, the existing off-site infrastructure is adequate and would be able to meet the service demands of the proposed Project. Because the Build Out of the Existing Land Use and Zoning Alternative would have a reduced demand compared to the proposed Project, the existing off-site infrastructure would also be able to service the Build Out of the Existing Land Use and Zoning Alternative.

Impacts to utilities and service systems would be less than significant under both the proposed project and the Build Out of the Existing Land Use and Zoning Alternative.

6.8.2 CONCLUSION

Ability to Reduce Impacts

The Build Out of the Existing Land Use and Zoning Alternative would redevelop the site with a 3-story a 317,552 square feet of light industrial building space, which would result in 9,559 fewer daily vehicular trips than the proposed Project. The reduction in vehicular trips from this alternative would reduce the proposed Project's significant and unavoidable operational air quality emissions and transportation/traffic impacts to a less than significant level. However, significant and unavoidable impacts related to greenhouse gas emissions would continue to occur from implementation of this alternative. Additionally, the mitigation required for hazards and hazardous materials and tribal cultural resources for the proposed Project would continue to be required for the Build Out of the Existing Land Use and Zoning Alternative. Mitigation related to land use and planning would not be required because no residences would exist on the site under this alternative.

Overall, although the volume of impacts would be less by the Build Out of the Existing Land Use and Zoning Alternative in comparison to the proposed Project, the Build Out of the Existing Land Use and Zoning Alternative would not eliminate all of the significant and unavoidable impacts of the proposed Project or eliminate the need for mitigation. Furthermore, the Build Out of the Existing Land Use and Zoning Alternative would result in a reduced beneficial impact, as it would not provide multi-family units on the Project site; and therefore, would not improve the jobs-housing balance.

Ability to Achieve Project Objectives

As shown in Table 6-8, the Build Out of the Existing Land Use and Zoning Alternative would only meet one Project objective, to redevelop existing land uses that would utilize existing infrastructure, including: water, sewer, arterial roadways, transit, and freeways; and provide non-vehicular (pedestrian and bicycle) circulation. . The site would not be redeveloped with new housing near existing employment centers, to meet the regions demand for housing or be developed consistent with the redevelopment in the Tustin Legacy Specific Plan area or within the IBC. It would not promote an improved jobs/housing balance and would not meet the related SCAG RTP/SCS land use objectives.

6.9 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires a lead agency to identify the "environmentally superior alternative" when significant environmental impacts result from a proposed Project. The Environmentally Superior Alternative for the proposed project would be the No Project/No Build Alternative. The No Project/No Build alternative would avoid the significant and unavoidable impacts of the Project and all of the potential construction impacts, reduce many of the operational impacts, and would not be required to implement the mitigation measures that are identified in Chapter 5.0 of this EIR that are related to: hazards and hazardous materials, land use and planning, transportation, and tribal cultural resources. However, this alternative would not improve the environment by improving storm water runoff quality, removing contaminated soils from the site, improving the jobs/housing balance and the related reduction in vehicle miles traveled.

Additionally, CEQA Guidelines Section 15126.6(3)(1) states:

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. (Emphasis added).

Therefore, pursuant to CEQA, because the No Project/No Build Alternative has been identified as the Environmentally Superior Alternative, the Environmentally Superior Alternative among the other alternatives would be the Build Out of the Existing Land Use and Zoning Alternative, which would involve redevelopment of the site with 317,552 square feet of light industrial building space and building heights of up to 35-feet. In addition, approximately 635 parking spaces (per Municipal Code Section 41-1390 requirement of 2 spaces per 1,000 square feet) would be required to be developed for use by the new buildings.

The Build Out of the Existing Land Use and Zoning Alternative would reduce the Project’s significant and unavoidable operational air quality and transportation/traffic impacts to a less than significant level, would implement the existing General Plan land use and zoning designations for the Project site, and would not require a General Plan amendment or zoning change. Because the Build Out of the Existing Land Use and Zoning Alternative would not include residential uses, it would not require implementation of Mitigation Measure LU-1, which requires resident notification of airport operations and potential annoyances.

However, this alternative would continue to require mitigation related to contaminated soils onsite and tribal cultural resources; and would continue to result in significant and unavoidable impacts related to GHG emissions. Therefore, although the volume of impacts would be less by the Build Out of the Existing Land Use and Zoning Alternative in comparison to the proposed Project, the Build Out of the Existing Land Use and Zoning Alternative would not eliminate all of the significant and unavoidable impacts of the proposed Project or eliminate the need for mitigation. In addition, it would not implement the SCAG policies to the same degree as the proposed Project, because this alternative would not locate new housing near existing jobs and reduce the jobs-housing ratio or the corresponding reduction in vehicle miles traveled.

In addition, the Build Out of the Existing Land Use and Zoning Alternative would not meet any of the Project objectives. The site would not be redeveloped with new housing near existing employment centers, to meet the regions demand for housing or be developed consistent with the redevelopment in the Tustin Legacy Specific Plan area or within the IBC. It would not promote an improved jobs/housing balance and would not meet the related SCAG RTP/SCS land use objectives.

CEQA does not require the Lead Agency (the City of Santa Ana) to choose the environmentally superior alternative. Instead, CEQA requires the City to consider environmentally superior alternatives, weigh those considerations against the environmental impacts of the proposed Project, and make findings that the benefits of those considerations outweigh the harm. Table 6-7 provides, in summary format, a comparison between the level of impacts for each alternative and the proposed Project. In addition, Table 6-8 provides a comparison of the ability of each of the alternatives to meet the objectives of the proposed Project.

Table 6-7: Impact Comparison of the Proposed Project and Alternatives

	Proposed Project	Alternative 1: No Project/No Build	Alternative 2: Reduced Project	Alternative 3: Build Out of the Existing Zoning
Aesthetics	Less than significant	Same as proposed Project, less than significant	Same as proposed Project, less than significant	Same as proposed Project, less than significant

	Proposed Project	Alternative 1: No Project/No Build	Alternative 2: Reduced Project	Alternative 3: Build Out of the Existing Zoning
Air Quality	Significant and unavoidable	Less; less than significant but exceeds threshold	Less, less than significant	Less, less than significant
Cultural Resources	Less than significant	Less, but also less than significant	Same as proposed Project, less than significant	Same as proposed Project, less than significant
Energy	Less than significant	Same as proposed Project, less than significant	Same as proposed Project, less than significant	Same as proposed Project, less than significant
Geology and Soils	Less than significant	Same as proposed Project, less than significant	Same as proposed Project, less than significant	Same as proposed Project, less than significant
Greenhouse Gas Emissions	Significant and unavoidable	Less; less than significant	Reduced emissions, but same as proposed Project, significant and unavoidable	Reduced emissions, but same as proposed Project, significant and unavoidable
Hazards and Hazardous Materials	Less than significant with mitigation	Less, no mitigation required	Same as proposed Project; less than significant with mitigation	Same as proposed Project; less than significant with mitigation
Hydrology and Water Quality	Less than significant	Same as proposed Project, less than significant	Same as proposed Project, less than significant	Same as proposed Project, less than significant
Land Use and Planning	Less than significant with mitigation	Less, no impacts, no mitigation required	Same as proposed Project; less than significant with mitigation	Less, no impacts, no mitigation required
Noise	Less than significant	Less, but also less than significant	Same as proposed Project; less than significant	Same as proposed Project; less than significant
Population and Housing	Less than significant	Less, but also less than significant	Same as proposed Project, less than significant	Same as proposed Project, less than significant
Public Services	Less than significant	Less, but also less than significant	Less, but also less than significant	Less, but also less than significant
Parks and Recreation	Less than significant	Less, but also less than significant	Less, but also less than significant	Less, but also less than significant
Transportation	Significant and unavoidable	Less, less than significant	Less, but also significant and unavoidable	Less, less than significant
Tribal Cultural Resources	Less than significant with mitigation	Less, no impacts, no mitigation required	Same as proposed Project; less than significant with mitigation	Same as proposed Project; less than significant with mitigation
Utilities and Service Systems	Less than significant	Less, but also less than significant	Less, but also less than significant	Less, but also less than significant
Reduce Impacts of the Project?		Yes	Yes	Yes
Areas of Reduced Impacts Compared to the Project		12	5, but requires the same mitigation and would result in	7, but requires mitigation and would result in

	Proposed Project	Alternative 1: No Project/No Build	Alternative 2: Reduced Project	Alternative 3: Build Out of the Existing Zoning
			significant and unavoidable impacts	significant and unavoidable GHG impacts

Table 6-8: Comparison of the Proposed Project and Alternatives Ability to Meet Objectives

	Proposed Project	Alternative 1: No Project/No Build	Alternative 2: Reduced Project	Alternative 3: Build Out of the Existing Zoning
Develop a mixed-use Project that constructs new multi-family residential units, which would help meet the region’s demand for housing.	Yes	No	Yes, but not to the same extent as the proposed Project.	No
Transform an underutilized site with an economically viable development consistent with other regional redevelopment in the Tustin Legacy Specific Plan and Irvine Business Complex (IBC) and combines residential uses with community-serving retail near employment opportunities, freeway access, and transit.	Yes	No	Yes, but not to the same extent as the proposed Project.	No
Redevelop existing land uses that would utilize existing infrastructure, including: water, sewer, arterial roadways, transit, and freeways; and provide non-vehicular (pedestrian and bicycle) circulation.	Yes	No	Yes, but not to the same extent as the proposed Project.	No
Develop a mix of housing to assist the City in meeting its jobs/housing balance.	Yes	No	Yes, but not to the same extent as the proposed Project.	No
Provide onsite uses that reduce vehicular miles traveled (VMT) by providing an internal pedestrian circulation system that links residential uses, recreation areas, and retail/commercial areas onsite.	Yes	No	Yes, but not to the same extent as the proposed Project.	No
Implement the SCAG Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) Land Use Policies related to population and housing by providing additional housing near employment centers.	Yes	No	Yes, but not to the same extent as the proposed Project.	No