

7. Alternatives to the Proposed Project

7.1 INTRODUCTION

7.1.1 Purpose and Scope

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

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

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

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- “An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative.” (15126.6[f][3])

For each development alternative, this analysis:

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

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

7.1.2 Project Objectives

As described in Section 3.2, the following objectives have been established for the Proposed Project and will aid decision makers in their review of the Project, the Project alternatives, and associated environmental impacts.

1. Provide for additional market-rate and affordable housing opportunities consistent with the City’s Housing Element and State housing goals.
2. Facilitate high-quality development that is compatible with the existing surrounding residential neighborhoods.
3. Reduce traffic volumes in the area and associated air quality, greenhouse gas, and noise impacts.
4. Protect the integrity of existing single-family neighborhoods.
5. Revitalize corridors offering a mix of land uses as an alternative to underutilized strip commercial development.

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

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

7.2.1 Alternative Development Areas

CEQA requires that the discussion of alternatives focus on alternatives to the Proposed Project or its location that are capable of avoiding or substantially lessening any significant effects of the Project. The key question and first step in the analysis is whether any of the significant effects of the Project would be avoided or

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substantially lessened by putting the Project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the Proposed Project need be considered for inclusion in the EIR (CEQA Guidelines § 15126.6[f][2][a]). Key factors in evaluating the feasibility of potential offsite locations for EIR project alternatives include: 1) site suitability; 2) economic viability; 3) availability of infrastructure; 4) general plan consistency; 4) other plans or regulatory limitations, 5) jurisdictional boundaries (projects with a regionally significant impact should consider the regional context); and 6) whether the Project Applicant could reasonably acquire, control, or otherwise have access to the alternative site (or the site is already owned by the proponent). (CEQA Guidelines Section 15126.6[f][1])

In general, any development of the size and type proposed by the Project would have substantially the same impacts related to construction unless the site is vacant. The Project Applicant does not own or control any vacant or other comparable property in the City that could accommodate the Proposed Project, does not require General Plan Amendment, and is economically viable. The Proposed Project found less than significant impacts without any mitigation measures related to aesthetics, operational air quality, biological resources, energy, geological and soils, greenhouse gas (GHG) emission, hydrology and water quality, land use and planning, noise, public services, utilities and service systems, and wildfire; and found less than significant with mitigation measures related to construction air quality, cultural resources, hazards and hazardous materials, paleontological resources, transportation and traffic, and tribal cultural resources. Development of similar size and number of units in the City would likely result in similar environmental impacts as the Proposed Project, unless an alternate location is vacant or is in condition substantially different than the Project Site or its surrounding. Therefore, another location would not avoid or substantially lessen the effects of the Proposed Project. No location has been identified in Anaheim Hills that could potentially meet the objectives of the Proposed Project and reduce significant impacts of the Proposed Project.

7.2.2 Redevelopment of the Project Site Alternative

The Project Applicant considered two land use alternatives that are consistent with the current Neighborhood Center (Commercial) designation and the “C-G” General Commercial Zone and Scenic Corridor (SC) Overlay Zone development standards.

Under an office and retail mixed-use alternative, the Project Site would be redeveloped with 58,000 square feet office use and 8,000 square feet retail, totaling 66,000 square feet of commercial uses. The existing 42,526 square feet of neighborhood commercial buildings would be demolished before 66,000 square feet of new, mixed nonresidential uses are developed. However, this alternative was rejected because it would likely result in greater transportation impact. Under this alternative, 58,000 square feet of office would generate approximately 565 average daily trips (ITE Code 710), and 8,000 square feet of retail would generate 1,079 average daily trips (ADT) (ITE Code 820), for a combined total of 1,644 ADT (ITE 2017). Therefore, when the existing 1,003 ADT from the Serrano Center is removed, this alternative is anticipated to generate 641 ADT. When compared to the Proposed Project’s 439 ADT, this alternative would result in greater traffic impacts. Greater traffic impacts would also likely result in greater operational air quality and greenhouse gas (GHG) emissions impacts. Similar to the Proposed Project, this alternative would require demolition of the existing Serrano Center and ground disturbance, which would likely result in cultural resources, paleontological resources, and tribal cultural resources impacts that require mitigation measure relating to unanticipated discovery of these resources. This

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alternative could also potentially affect emergency evacuation and emergency response plan during construction phase due to construction-related traffic and staging plan. Therefore, similar to the Proposed Project, this alternative would require all mitigation measures identified for the Proposed Project to reduce impacts.

The second nonresidential alternative considered is a restaurant use alternative, which would contain three restaurants totaling 12,700 square feet and 150 parking spaces. Two of the three restaurants would be fast-food restaurants with drive-thru window, and one would be a sit-down restaurant. Approximately 8,000 square feet of fast-food restaurant would generate 3,768 ADT (ITE Code 934), and 4,700 square feet of sit-down quality restaurant would generate approximately 423 ADT (ITE Code 931), for a combined total of 4,191 ADT. Therefore, when the existing 1,003 ADT from the Serrano Center is removed, this alternative is anticipated to generate approximately 3,188 ADT. Therefore, this alternative would result in over six times more traffic than the Proposed Project's projected 439 ADT. Therefore, as with the mixed office and retail use alternative, this alternative is anticipated to result in greater impacts in the area of transportation, operational air quality, GHG emissions, and mobile source noise. And as with the Proposed Project, this alternative could potentially disturb previously undisturbed soils to cause potential impacts to archaeological resources, tribal cultural resources, and paleontological resources. Moreover, demolition of the existing buildings and construction of 12,700 square feet of restaurants and associated 150 parking would result in construction-related traffic that would require a construction traffic management plan and staging plan to reduce potential impacts to an emergency evacuation plan.

The City considered these two land use alternatives to respond to the community's concern over changing the existing land use from commercial to residential and to be consistent with the existing land use designation. However, pursuant to the Section 15126.6[b] of the CEQA Guidelines, the discussion of alternatives is intended to focus on alternatives to the Project that are capable of avoiding or substantially lessening any significant effects of the Project, even if these alternatives would impede to some degree the attainment of the Project objectives, or would be more costly. Therefore, because these two nonresidential-use alternatives would not avoid or substantially lessen any potentially significant effect identified for the Proposed Project and would not meet any of the Project objectives, the City found that review of these alternatives would not meet the intent of alternatives analysis, and they were rejected for further analysis.

7.3 ALTERNATIVES SELECTED FOR FURTHER ANALYSIS

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

- No Project/Continued Commercial Use Alternative
- Reduced Density Alternative
- Mixed Use Alternative

CEQA requires the alternatives analysis to include a No Project Alternative in order to allow decision makers to compare the impacts of approving the Proposed Project with the impacts of not approving the Proposed

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Project (CEQA Guidelines § 15126.6[e][1]). According to CEQA Guidelines § 15126.6[e][2], the No Project Alternative “shall discuss the existing conditions at the time the notice of preparation is published...as well as what would reasonably be expected to occur in the foreseeable future if the Proposed Project were not approved, based on current plans, and consistent with available infrastructure and community services.” This chapter analyzes in detail one No Project/No Development Alternative.

An EIR must identify an “environmentally superior” alternative, and where the No Project Alternative is identified as environmentally superior, the EIR is required to identify as environmentally superior an alternative from among the others evaluated. Each alternative’s environmental impacts are compared to the Proposed Project and determined to be environmentally superior, neutral, or inferior. However, only the impacts found significant and unavoidable are used in making the final determination of whether an alternative is environmentally superior or inferior to the Proposed Project. No impact was found to be significant and unavoidable. Impacts related to air quality (construction only), cultural resources (archaeological), paleontological resources, hazards and hazardous materials (emergency access during construction), transportation and traffic (emergency access during construction), tribal cultural resources, and wildfire (emergency access during construction) were found to be less than significant with implementation of mitigation measures. Section 7.7 identifies the Environmentally Superior Alternative.

7.3.1 Alternatives Comparison

The Preferred Land Use Alternative (Proposed Project) is analyzed in detail in Chapter 5 of this DEIR. Table 7-1 provides a summary of each project alternative analyzed in this chapter.

Table 7-1 Summary of Development Alternatives

Alternative	Description	Basis for Selection and Summary of Analysis
Proposed Project		
The Residences at Nohl Ranch	<ul style="list-style-type: none"> • Construct 58 residential units on a 3.03-acre site, including 12 affordable housing units (19.3 units/ac). • 8 buildings totaling 118,351 square feet. • 148 parking spaces (116 garage spaces and 32 uncovered surface spaces). • Demolish existing 42,526 square feet of nonresidential space. • Density of 19.14 units per acre. • A net reduction of 438 ADT. • Approve a General Plan Amendment from Neighborhood Center (Commercial) to Low-Medium Density Residential (18 du/ac). • Approve a Zoning Reclassification from “C-G” General Commercial Zone to “RM-3” Multiple-Family Residential Zone. • Approve an Affordable Housing Density Bonus to allow 19.14 du/ac in the RM-3 Zone, which permits 18 du/ac. 	N/A

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Table 7-1 Summary of Development Alternatives

Alternative	Description	Basis for Selection and Summary of Analysis
Project Alternatives		
1) No Project/ Continued Commercial Use Alternative	<ul style="list-style-type: none"> • Approve an Affordable Housing Tier II Incentives to waive the minimum lot size and required minimum setbacks. • The proposed 58 residential units would not be constructed and the existing neighborhood commercial uses would remain. • The existing 42,526 square feet of nonresidential space would not be demolished. • No affordable housing units would be provided. • Existing commercial land uses would remain, and no General Plan Amendment and Zoning Reclassification will be necessary. • The existing setbacks from the adjacent residential uses would remain. • 1,003 ADT from the existing commercial uses and 126 from the school drop-off/pick-up would continue. 	<ul style="list-style-type: none"> • Required by CEQA. • Avoids need for general plan and zone change. • Reduces construction air quality impact. • Reduces short-term construction impacts to emergency evacuation plan. • Increases environmental impacts to operational air quality, GHG emissions, and transportation/traffic. • Does not meet the Project objectives.
2) Reduced Density Residential Development Alternative	<ul style="list-style-type: none"> • Construct 19.7 units (6.5 units/ac) not exceeding the RS-2 zone's minimum lot area standard of 7,200 square feet. • Demolish existing 42,526 square feet of nonresidential space. • Approve General Plan Amendment from Neighborhood Center (Commercial) to Low Density Residential (6.5 du/ac). • Approve Zoning Reclassification from "C-G" General Commercial Zone to "RS-2" Single-Family Residential Zone. • Approve a Specimen Tree Removal Permit and provide replacement specimen trees. 	<ul style="list-style-type: none"> • Reduces construction air quality and construction emergency access impacts. • Reduces aesthetic impacts. • Meets some of the Project objectives but not to the degree of the Proposed Project. • Would not eliminate the need for mitigation measures.
3) Mixed Use Alternative	<ul style="list-style-type: none"> • Construct 29 residential units (50% of the Proposed Project's 58 units). • Demolish four of the seven existing buildings (approximately 24,115 square feet (approximately 60% of the existing 42,526 square feet of nonresidential). • Approve an Affordable Housing Density Bonus and associated Tier II Incentives. • Approve a General Plan Amendment from Neighborhood Center (Commercial) to Low-Medium Density Residential (18 du/ac) or Mixed Use Mid. • Approve a Zoning Reclassification from "C-G" General Commercial Zone to Mixed Use. • Approve a Conditional Use Permit to allow single-family attached residential use with modified standards. • Approve a Specimen Tree Removal and provide replacement specimen trees. 	<ul style="list-style-type: none"> • Reduces construction air quality, cultural, paleontological, tribal cultural resources, and construction emergency access impacts. • Meets all of the Project objectives but not to the degree of the Proposed Project. • Would not eliminate the need for mitigation measures.

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7.4 NO PROJECT/CONTINUED COMMERCIAL USE ALTERNATIVE

Under this alternative, no development would occur, and the existing neighborhood commercial retail center would continue to operate. Therefore, the existing 42,526 square feet of nonresidential uses would not be demolished and the proposed 58 multifamily units would not be constructed. The Project Site would continue to generate approximately 1,003 average daily trips, and 126 trips from the school drop-off/pick-up would continue.

7.4.1 Aesthetics

Under this alternative, the current neighborhood retail center would remain as is with no residential development. The seven one-story buildings would remain, and no specimen tree removal would be necessary. No additional lighting would be provided. Existing setbacks would be maintained, and no obstruction of hillside views from any of the residences to the north would occur. Under this alternative, there would be no changes to the visual quality of the Project Site. This alternative would have less aesthetics impacts compared to the Proposed Project. Aesthetic impacts are not a significant and unavoidable impact of the Proposed Project.

7.4.2 Air Quality

No demolition and construction would be required under this alternative; therefore, no construction-related air quality impacts would occur. Although the Proposed Project would result in a less than significant construction air quality impact, not exceeding the SCAQMD's threshold criteria, the alternative would generate no construction-related emissions. Therefore, this alternative would reduce impacts related to construction air quality compared to the Proposed Project.

The greatest maximum daily regional operational emissions are from mobile sources. Operational air quality emissions were calculated based on average daily trips (ADTs) associated with the Proposed Project compared to the existing uses. The Proposed Project is estimated to generate 439 ADTs on weekdays. When compared to the Project Site's existing use, the Proposed Project would result in a net decrease of 564 weekday, and as a result, total carbon monoxide emissions from mobile sources are 19 lbs/day under this alternative and 13 lbs/day under the Proposed Project. This alternative would result in greater operational air quality impacts compared to the Proposed Project. Air quality impacts are not a significant and unavoidable impact of the Proposed Project.

7.4.3 Biological Resources

Under this alternative, all existing ornamental landscaping, including mature trees and specimen trees, would be removed and/or replaced from the Project Site. This alternative would reduce physical impacts to biological resources compared to the Proposed Project.

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7.4.4 Cultural Resources

Under this alternative, no earthwork or soil disturbance would occur, and the potential impacts for discovering and damaging buried archaeological resources would be eliminated. The No Project alternative would reduce impacts related to archaeological resources. Archaeological resources impact is not a significant and unavoidable impact of the Proposed Project.

7.4.5 Energy

The Proposed Project is projected to generate decreased demand for electricity but increased demands for natural gas. Therefore, under the No Project Alternative, electricity impacts would be greater, and natural gas impacts would be reduced. The overall impact on energy would be similar to the Proposed Project.

7.4.6 Geology and Soils, and Paleontological Resources

Under this alternative, no earth work or soil disturbance would occur; therefore, no unstable landslide or other geologic conditions due to unstable geologic units would occur. This alternative would reduce impacts to geology and soils. However, it should be noted that the Proposed Project would result in less than significant impacts to geology and soils without any mitigation.

This alternative would also eliminate the need to disturb previously undisturbed soils, and therefore would reduce impacts to potentially discovering and damaging paleontological resources. Impacts to paleontological resources are not a significant and unavoidable impact of the Proposed Project.

7.4.7 Greenhouse Gas Emissions

As shown in Table 5.7-7, *Project Related GHG Emissions*, in Section 5.7, *Greenhouse Gas Emissions*, the existing land use generates approximately 1,335 metric tons of carbon-dioxide-equivalent emissions (MTCO₂e) per year, and the Proposed Project is anticipated to generate 575 MTCO₂e per year based on the CalEEMod. Because greater GHG emissions related to energy and mobile sources are anticipated under this alternative, this alternative would result in a greater impact than the Proposed Project.

7.4.8 Hazards and Hazardous Materials

Under this alternative, the Project Site is left undisturbed and no construction would occur. Therefore, no construction-related hazardous materials would be used, disposed of, or transported, and no impacts would occur. No construction-related traffic or staging would be necessary e that could temporarily affect an emergency response plan or emergency evacuation plan. Impacts of the Proposed Project were found to be less than significant with mitigation incorporated. No significant impacts would occur under the No Project Alternative without any mitigation measures, and this alternative would reduce impacts of the Proposed Project.

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7.4.9 Hydrology and Water Quality

Under this alternative, existing water quality conditions, groundwater supplies, drainage patterns, and runoff amounts would remain as is since no development would occur. This alternative would not introduce new sources of water pollutants to the Project Site during construction phases of development. However, under this alternative, the impervious surface coverage would be greater than the Proposed Project. Under existing conditions, the Project Site is 92 percent impervious; under the Proposed Project, this would decrease to 84 percent. Also, this alternative would not provide biotreatment best management practices (BMP) to reduce runoff and minimize water pollution, which would have a beneficial impact on overall stormwater quality. Therefore, under this alternative, hydrology and water quality impacts would be less than during construction period of the Proposed Project, but slightly greater than during operation of the Project. This alternative would result in less than significant hydrology and water quality impacts, as would the Proposed Project, but it would not reduce overall impacts related to hydrology and water quality compared to the Proposed Project.

7.4.10 Land Use and Planning

Under this alternative, no amendment to the general plan land use designation and no zoning reclassification would be necessary. Also, no conditional use permit (CUP) or other miscellaneous permit would be necessary to waive or modify development standards under the RM-3 Zone and the Scenic Corridor (SC) Overlay Zone. Therefore, this alternative would not conflict with any land use plan, policy, or regulations, and no significant environmental impacts would occur. This alternative would reduce impacts related to land use and planning compared to the Proposed Project; however, the Project's impacts were also less than significant without mitigation.

7.4.11 Noise

Under this alternative, no demolition and redevelopment would be necessary; therefore, this alternative would eliminate construction-related noise impacts. The Proposed Project would reduce traffic volumes generated from the Project Site; therefore, long-term traffic noise impacts would be greater under this alternative. However, operational stationary noise from HVAC would be reduced under this alternative. Less than significant construction noise impacts were identified with the Proposed Project without mitigation measures. Therefore, this alternative would reduce short-term construction impact of the Proposed Project but would not reduce long-term impacts of the Proposed Project.

7.4.12 Public Services

This alternative would not increase demand for fire, police, or school public services and facilities in the City. This alternative would reduce impacts of the Proposed Project; however, public services are not a significant and unavoidable impact of the Proposed Project.

7.4.13 Transportation

Under this alternative, construction-related traffic would be eliminated. However, the Proposed Project would result in a net decrease in traffic from the existing 1,003 ADT to 439 ADT with implementation of the

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Proposed Project. This alternative would also result in more vehicle miles traveled (VMT)—3,130,943 annual VMT under the existing condition compared to 1,325,859 annual VMT under the Proposed Project. Therefore, this alternative is anticipated to have greater operational traffic impacts and would not reduce impacts compared to the Proposed Project.

7.4.14 Tribal Cultural Resources

The Project Site would remain in its existing conditions and no ground-disturbing activities would occur. Therefore, no tribal cultural resources onsite would be affected. Impacts would be reduced in comparison to the Proposed Project. However, tribal cultural resources are not a significant and unavoidable impact of the Proposed Project.

7.4.15 Utilities and Service Systems

Under this alternative, there would be no increase in demand for potable or recycled water, and no increase in wastewater generation or solid waste disposal. This alternative would reduce impacts related to water, sewer, stormwater, and solid waste compared to the Proposed Project. However, utilities and service systems are not a significant and unavoidable impact of the Proposed Project.

7.4.16 Wildfire

The Project Site is in a Very High Fire Hazard Severity Zone in a local responsibility area. The Project Site is already developed, and continuation of neighborhood commercial operation would not require installation of infrastructure or modification to existing slopes in a way that would exacerbate fire risk or increase flooding or landslides, and would not exacerbate pollution from wildfires. However, under this alternative, no changes to internal or offsite circulation or traffic volumes would occur, and emergency response or evacuation plans would not be impaired during a construction period. This alternative would slightly reduce impacts related to wildfire. Wildfire impacts are not a significant and unavoidable impact of the Proposed Project.

7.4.17 Conclusion

This alternative would lessen environmental impacts in the areas of aesthetics, construction air quality, biological resources, cultural resources (archaeological resources), geology and soils, paleontological resources, hazards and hazardous materials, hydrology and water quality, land use and planning, construction noise, public services (fire, police, and school services), transportation during construction, tribal cultural resources, utilities and service systems, and wildfire during construction; it would worsen impacts in the areas of long-term air quality, GHG emissions, and long-term operation transportation; and it would have similar impacts in the areas of energy, operational noise and wildfire during operation. Although no significant and unavoidable impact has been identified for the Proposed Project under both options, this alternative is considered environmentally superior to the Proposed Project.

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7.5 REDUCED DENSITY RESIDENTIAL DEVELOPMENT ALTERNATIVE

Under this alternative, the Project Site would be developed with a density of 6.5 units per acre, therefore constructing a total of 20 units. No affordable housing would be provided under this alternative, therefore, density bonus or Tier II incentives would not be applied. The development density would be consistent with the adjacent RS-2 Zone's minimum lot area standard of 7,200 square feet. This alternative would require demolition of the existing 42,526 square feet of neighborhood commercial uses and removal of the specimen trees. Development would require approval of a General Plan Amendment from the existing Neighborhood Center (Commercial) to Low Density Residential (6.5 du/ac), and a Zoning Reclassification from "C-G" General Commercial Zone to "RS-2" Single-Family Residential Zone. This alternative would also be developed to meet the Scenic Corridor (SC) Overlay Zone's 50-foot setback standard and building-to-building setback standard. This alternative would eliminate the need for a CUP.

7.5.1 Aesthetics

Under this alternative, the Project Site would be developed in a similar pattern as the surrounding residential properties. No modification to minimum lot size and setback requirements under the RS-2 Zone would be necessary. All units would be developed at a maximum height of 30 feet, and the hillside view to the south from the north sensitive receptors would be obstructed. Because no modification to the standards of the RS-2 Zone would be necessary under this alternative, this alternative would reduce aesthetic impacts of the Proposed Project. Aesthetics is not a significant and unavoidable impact of the Proposed Project.

7.5.2 Air Quality

Reduced building space would result in a reduction in construction air quality impacts, and a reduction in the number of units would result in decreased long-term operational air quality impacts compared to the Proposed Project. This alternative would reduce both construction and operational air quality impacts of the Proposed Project. Air quality is not a significant and unavoidable impact of the Proposed Project.

7.5.3 Biological Resources

Under this alternative, like the Proposed Project, all onsite landscaping and trees would be removed prior to redevelopment. Therefore, similar impacts to existing biological resources would occur compared to the Proposed Project. Biological resources are not a significant and unavoidable impact of the Proposed Project.

7.5.4 Cultural Resources

Under this alternative, like the Proposed Project, all existing buildings would be removed and the Project Site would be graded. Therefore, the potential impacts to subsurface archaeological resources would be similar under this alternative as the Proposed Project. A mitigation measure that requires monitoring during certain grading activities would still be necessary. Cultural resources are not a significant and unavoidable impact of the Proposed Project.

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7.5.5 Energy

Under this alternative, the number of residential units would be reduced to 20 units; therefore, electricity and natural gas impacts would be reduced. Energy is not a significant and unavoidable impact of the Proposed Project.

7.5.6 Geology and Soils, and Paleontological Resources

Under this alternative, like the Proposed Project, all existing buildings would be removed, the Project Site would be graded, and all development would be required to comply with the most recent building and seismic codes and regulations. This alternative would not reduce impacts related to geology and soils. This alternative would also require a similar mitigation measure to reduce potential impacts to paleontological resources by requiring monitoring during ground-disturbing activities that occur in deposits that could potentially contain paleontological resources (e.g., Puente Formation, the Soquel Member, and the La Vida Member). Therefore, impacts to geology and soils and paleontological resources impacts would be similar to the Proposed Project, and would not be reduced. Geology and soils and paleontological resources are not a significant and unavoidable impact of the Proposed Project.

7.5.7 Greenhouse Gas Emissions

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

7.5.8 Hazards and Hazardous Materials

As with the Proposed Project, development under this alternative would be required to comply with applicable regulations when using, storing, and disposing of construction-related hazardous materials. This alternative would also require a construction-related traffic or staging plan so that impacts to an emergency response plan or emergency evacuation plan could be reduced. Impacts of the Proposed Project were found to be less than significant with mitigation incorporated. Hazards and hazardous materials impact of this alternative would be similar to the Proposed Project. Hazards and hazardous materials are not a significant and unavoidable impact of the Proposed Project.

7.5.9 Hydrology and Water Quality

Under this alternative, like the Proposed Project, all vegetation onsite would be removed, and the Project Site would be graded in accordance with the NPDES Construction General Permit requirements. Appropriate BMPs would be implemented to ensure that post-Project hydrology and water quality are not degraded compared to the existing conditions. This alternative would reduce the percentage of impervious surface because of the required 40 percent maximum lot coverage with a minimum lot area standard of 7,200 square

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feet in the RS-2 Zone, compared to a 45 percent maximum site coverage in the RM-3 Zone with a minimum building site area per dwelling unit of 2,400 square feet. This alternative would reduce impacts related to hydrology and water quality compared to the Proposed Project. Hydrology and water quality are not a significant and unavoidable impact of the Proposed Project.

7.5.10 Land Use and Planning

This alternative would still require an amendment to the general plan from the existing Neighborhood Center (Commercial) to Low Density Residential (6.5 du/ac), and a zoning reclassification from “C-G” General Commercial Zone to “RS-2” Single-Family Residential Zone. However, no CUP or affordable housing bonus and associated incentives approval would be necessary. The Project Site would have the same general plan designation and zoning as the abutting residential properties to the north, east, and south. Although this alternative would not be consistent with the existing land use designation of the Project Site, this alternative would not require a number of development standard modifications requested under the Proposed Project; therefore, it is considered to have less impact than the Proposed Project. Land use and planning are not a significant and unavoidable impact of the Proposed Project.

7.5.11 Noise

A reduction in building area would decrease the Project-related construction noise impacts. The reduction in number of units would also result in decreased traffic volumes, thus reducing the operational traffic-related noise impact compared to the Proposed Project. This alternative would reduce impacts related to both construction and operational noise. Noise is not a significant and unavoidable impact of the Proposed Project.

7.5.12 Public Services

This alternative would reduce the number of units developed on the Project Site, and therefore reduce impacts related to fire, police, and school services. Public services are not a significant and unavoidable impact of the Proposed Project.

7.5.13 Transportation

This alternative would have fewer traffic-related impacts than the Proposed Project during construction and operation because fewer units would be constructed. Transportation impacts would be reduced compared to the Proposed Project. Transportation is not a significant and unavoidable impact of the Proposed Project.

7.5.14 Tribal Cultural Resources

Under this alternative, like the Proposed Project, all existing buildings would be removed and the Project Site would be graded. Therefore, the potential impacts to subsurface tribal cultural resources would be similar under this alternative as the Proposed Project. Tribal cultural resources is not a significant and unavoidable impact of the Proposed Project.

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7.5.15 Utilities and Service Systems

There would be approximately 65 percent fewer units under this alternative compared to the Proposed Project (from 58 units to 19.7 units). Therefore, this alternative would generate less wastewater and consume less water. The solid waste, electricity, and gas demands would also be reduced. This alternative would also decrease impervious area coverage, and therefore is likely to result in reduced stormwater volume compared to the Proposed Project. This alternative would reduce overall utilities and service systems demands compared to the Proposed Project. Utilities and service systems are not a significant and unavoidable impact of the Proposed Project.

7.5.16 Wildfire

The Project Site is already developed, and redevelopment of the Project Site with 20 single-family units would not require major changes to the existing infrastructure or modification to slopes in a way that would exacerbate fire risk or increase flooding or landslides, and would not exacerbate pollution from wildfires. This alternative would not reduce impacts related to wildfire. Wildfire is not a significant and unavoidable impact of the Proposed Project.

7.5.17 Conclusion

This alternative would lessen environmental impacts in the areas of aesthetics, air quality, energy, geology and soils, GHG emissions, hydrology and water quality, land use and planning, noise, public services (fire, police, and school services), transportation, and utilities and service systems; and it would have similar impacts in the areas of biological resources, cultural resources (archaeological resources), paleontological resources, hazards and hazardous materials, tribal cultural resources, and wildfire. Although no significant and unavoidable impact has been identified for the Proposed Project, this alternative is considered environmentally superior to the Proposed Project.

7.6 MIXED USE ALTERNATIVE

Under this alternative, approximately 60 percent of the Project Site would be redeveloped as residential use, and the remaining 40 percent would continue to operate as neighborhood commercial. Therefore, the Project Site would be redeveloped with 29 residential units—50 percent of the Proposed Project (58 units). This alternative would demolish four of the seven buildings on the Project Site, or approximately 24,115 square feet of the existing building area—i.e., 57 percent of the total existing neighborhood commercial use, which is 42,526 square feet. The Mixed Use Alternative would need to be implemented under the Mixed-Use Mid land use designation that allows residential density of up to 27 dwelling units per acre, or the Project Site would need to be subdivided so that only a portion of the Project Site is converted to residential zoning to accommodate both commercial and residential. Under this alternative, seven affordable housing would be provided, and various approvals such as a General plan Amendment, Zoning Reclassification, CUP, and Affordable Housing Density Bonus and Incentives would be requested to modify various development standards to house residential units on approximately 60 percent of the Project Site.

7. Alternatives to the Proposed Project

7.6.1 Aesthetics

This alternative would have similar aesthetic impacts as the Proposed Project. Although the number of units would be decreased to 29 from 58, the units would be constructed on approximately 60 percent of the Project Site, and similar development standard modifications as the Proposed Project would be necessary, such as reduced minimum lot size, street setback, interior building-to-building setback, and landscape setback. As with the Proposed Project, some of the buildings could obstruct views of the hillside to the south from the nearby residential receptors. However, obstruction of views alone does not constitute an adverse aesthetic impact, and no public vista or scenic viewshed would be blocked. Therefore, this alternative would not reduce impacts related to aesthetics compared to the Proposed Project. Aesthetics is not a significant and unavoidable impact of the Proposed Project.

7.6.2 Air Quality

Under this alternative, only four buildings out of seven would be demolished, and only 29 units would be developed. Therefore, it would reduce construction-related air quality impacts. However, during operation, approximately 220 trips would be generated from the proposed 29 units (50 percent of 439 trips anticipated for the Proposed Project), and approximately 401 trips are anticipated from the remaining three neighborhood commercial buildings (40 percent of 1,003 trips under the existing condition), for a combined total of approximately 621 trips. Therefore, the mixed-use alternative would result in an increased number of trips and increased long-term operational air quality impacts compared to the Proposed Project. This alternative would reduce construction air quality impacts, but increase operational air quality impacts of the Proposed Project. Air quality is not a significant and unavoidable impact of the Proposed Project.

7.6.3 Biological Resources

This alternative would redevelop and disturb only a portion of the Project Site. Therefore, some of the existing trees and vegetation would not be removed. This alternative would reduce impacts related to biological resources. Biological resources are not a significant and unavoidable impact of the Proposed Project.

7.6.4 Cultural Resources

This alternative would redevelop and disturb only a portion of the Project Site. Therefore, the area of soil disturbance would be smaller than the Proposed Project's, and impacts to subsurface archaeological resources would be less than for the Proposed Project. This alternative would reduce impacts to cultural resources. However, a mitigation measure that requires monitoring during certain grading activities would still be necessary. Cultural resources are not a significant and unavoidable impact of the Proposed Project.

7.6.5 Energy

Under this alternative, the number of residential units would be reduced to 29 units, but approximately 40 percent of the commercial uses would continue to operate. Considering that residential uses generate less demand for electricity and greater demand for natural gas, this alternative is not anticipated to result in a

7. Alternatives to the Proposed Project

reduction in energy impacts compared to the Proposed Project. Energy is not a significant and unavoidable impact of the Proposed Project.

7.6.6 Geology and Soils

This alternative would redevelop and disturb only a portion of the Project Site. However, as with the Proposed Project, new buildings and graded areas would be required to comply with the most recent building and seismic codes and regulations. This alternative would not reduce impacts related to geology and soils. Geology and soils are not a significant and unavoidable impact of the Proposed Project.

This alternative would reduce the area to be graded and excavated, although it would require a similar mitigation measure to reduce potential paleontological resources impacts by requiring monitoring during ground-disturbing activities that occur in deposits that could potentially contain paleontological resources (e.g., Puente Formation, the Soquel Member and the La Vida Member). Because the area of disturbance would be reduced, the potential for discovering and damaging paleontological resources would also be reduced. Paleontological resources is not a significant and unavoidable impact of the Proposed Project.

7.6.7 Greenhouse Gas Emissions

Under this alternative, less building area would be constructed, which would result in a reduction in construction GHG emissions. However, as described under the air quality impact for this alternative (Section 7.6.2), there would be more vehicle trips during operation. Provided that mobile source emissions generate the greatest GHG emissions during operation, this alternative would likely result in greater GHG emissions compared to the Proposed Project. GHG emissions are not a significant and unavoidable impact of the Proposed Project.

7.6.8 Hazards and Hazardous Materials

This alternative would use, store, and dispose of hazardous materials during construction. However, this alternative would use less hazardous material due to the reduced building areas to be demolished and redeveloped. As with the Proposed Project, development under this alternative would be required to comply with applicable regulations to ensure that no significant release of hazardous materials occurs, and would also be required to provide a construction-related traffic and staging plan to the City for review and approval. Reduced building area would likely reduce the duration of construction, shortening the period that the environment and people could be potentially exposed to hazardous materials. Therefore, hazards and hazardous materials impacts of this alternative would be less than the Proposed Project. Hazards and hazardous materials are not a significant and unavoidable impact of the Proposed Project.

7.6.9 Hydrology and Water Quality

This alternative would redevelop and disturb only a portion of the Project Site, and the rest would continue to operate as neighborhood commercial center. Therefore, the area of soil disturbance would be smaller than the Proposed Project, and hydrology and water quality impacts during construction would be less than the Proposed Project. And as with the Proposed Project, this alternative would be required to be graded in accordance with the NPDES Construction General Permit requirements and incorporate appropriate BMPs.

7. Alternatives to the Proposed Project

This alternative would reduce impacts related to hydrology and water quality compared to the Proposed Project. Hydrology and water quality are not a significant and unavoidable impact of the Proposed Project.

7.6.10 Land Use and Planning

As with the Proposed Project, this alternative would require the same discretionary approval from the City, including an amendment to the general plan from the existing Neighborhood Center (Commercial) to Low-Medium Density Residential (18 du/ac); a zoning reclassification from “C-G” General Commercial Zone to “RM-3” Multi-Family Residential Zone; a CUP for interior setback requirement modification; and Affordable Housing Bonus and Associated Incentives approvals for minimum lot size and setback waivers. Similar to the Proposed Project, this alternative would not be consistent with the existing land use designation of the Project Site and would require a number of development standard modifications. Therefore, this alternative would not reduce impacts related to land use and planning compared to the Proposed Project. Land use and planning are not a significant and unavoidable impact of the Proposed Project.

7.6.11 Noise

Under this alternative, only a portion of the Project Site would be demolished and redeveloped. Therefore, a reduction in construction noise impact is anticipated. The operational phase of this alternative would generate more vehicle trips (see Section 7.6.13) and would increase operational traffic-related noise impacts. Noise impacts of this alternative would be reduced compared to the Proposed Project during construction, and impacts would increase during operation. Noise is not a significant and unavoidable impact of the Proposed Project.

7.6.12 Public Services

The Mixed Use Alternative would construct 29 units instead of the 58 units proposed under the Proposed Project. Therefore, impacts related to fire, police, and school would be reduced compared to the Proposed Project. Public services are not a significant and unavoidable impact of the Proposed Project.

7.6.13 Transportation

Under this alternative, construction-related traffic would be reduced since there would be a reduction in building demolition and building construction. During operation, approximately 220 trips are anticipated from the proposed 29 units (50 percent of 439 trips for the Proposed Project), and approximately 401 trips are anticipated from the remaining three neighborhood commercial buildings (40 percent of 1,003 trips under the existing condition), for a combined total of approximately 621 trips. Therefore, the Mixed Use Alternative is anticipated to result in an increased number of trips and increased long-term operational transportation impacts compared to the Proposed Project. Transportation is not a significant and unavoidable impact of the Proposed Project.

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7.6.14 Tribal Cultural Resources

This alternative would redevelop and disturb only a portion of the Project Site. Therefore, the area of soil disturbance would be smaller than the Proposed Project, and impacts to subsurface tribal cultural resources would be less than the Proposed Project. However, a mitigation measure that requires monitoring during certain grading activities would still be necessary. Tribal cultural resources are not a significant and unavoidable impact of the Proposed Project.

7.6.15 Utilities and Service Systems

There would be 50 percent fewer units under this alternative compared to the Proposed Project (from 58 units to 29 units), and the remaining 18,411 square feet of commercial uses (approximately 40 percent of existing) would continue to operate. The Proposed Project is anticipated to increase wastewater generation from 10,710 gallons per day (gpd) to 14,400 gpd. Therefore, assuming 40 percent of the existing wastewater generation plus 50 percent of the increase due to residential development, this alternative could generate approximately 6,129 gpd of wastewater. Therefore, this alternative would reduce wastewater generation compared to the Proposed Project. Since there would be a reduction in wastewater, it is also anticipated that this alternative would consume less water than the Proposed Project. Similarly, solid waste and gas demands would be reduced with the 50 percent reduction in unit count. However, because the Proposed Project is anticipated to result in a net decrease in electricity—since commercial uses consume more electricity than residential uses—this alternative is anticipated to result in greater electricity demands compared to the Proposed Project. This alternative would reduce overall utilities and service systems demands compared to the Proposed Project, with the exception of electricity, which would result in greater impacts than the Proposed Project. Utilities and service systems are not a significant and unavoidable impact of the Proposed Project.

7.6.16 Wildfire

The Project Site is already developed, and redevelopment of a portion of the Project Site would not require major changes to the existing infrastructure or modification to slopes in a way that would exacerbate fire risk or increase flooding or landslides, and would not exacerbate pollution from wildfires. This alternative would not reduce impacts related to wildfire. Wildfire impacts are not a significant and unavoidable impact of the Proposed Project.

7.6.17 Conclusion

This alternative would lessen environmental impacts in the areas of construction air quality, biological resources, cultural resources (archaeological resources), paleontological resources, construction GHG emissions, hazards and hazardous materials, hydrology and water quality, construction noise, public services (fire, police, and school services), construction transportation, tribal cultural resources, and utilities and service systems. It would have similar impacts in the areas of aesthetics, geology and soils, land use and planning, and wildfire. And it would have greater impacts in the areas of operational air quality, operational GHG emission, operational noise, and operational traffic. All mitigation measures identified for the Proposed Project would

7. Alternatives to the Proposed Project

still be required. Although no significant and unavoidable impact has been identified for the Proposed Project, this alternative is considered environmentally superior to the Proposed Project.

7.7 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires a lead agency to identify the “environmentally superior alternative” and, in cases where the “No Project” Alternative is environmentally superior to the Proposed Project, the environmentally superior development alternative must be identified. As summarized in Table 7-2, all Project alternatives reviewed would be environmentally superior to the Proposed Project, and Alternative 2, Reduced Density Alternative, would have the least environmental impacts compared to the Proposed Project:

Table 7-2 Summary of Proposed Project and Alternatives

Topic	Proposed Project	Alternative 1: No Project	Alternative 2: Reduced Density	Alternative 3: Mixed Use
Aesthetics	LTS	-	-	=
Air Quality				
<i>Short-Term Construction</i>	LTS/MM	-	-	-
<i>Long-Term Operation</i>	LTS	+	-	+
Biological Resources	LTS	-	=	-
Cultural Resources	LTS/MM	-	=	-
Energy	LTS	+	-	+
Geology and Soils	LTS	-	-	=
Paleontology	LTS/MM	-	=	-
Greenhouse Gas Emissions				
<i>Short-Term Construction</i>	LTS	-	-	-
<i>Long-Term Operation</i>	LTS	+	-	+
Hazards and Hazardous Materials				
<i>Short-Term Construction</i>	LTS/MM	-	=	-
<i>Long-Term Operation</i>	LTS	-	=	-
Hydrology and Water Quality				
<i>Short-Term Construction</i>	LTS	-	-	-
<i>Long-Term Operation</i>	LTS	-	-	-
Land Use and Planning	LTS	-	-	=
Noise				
<i>Short-Term Construction</i>	LTS	-	-	-
<i>Long-Term Operation</i>	LTS	=	-	+
Public Services	LTS	-	-	-
Transportation and Traffic				
<i>Short-Term Construction</i>	LTS/MM	-	-	-
<i>Long-Term Operation</i>	LTS	+	-	+
Tribal Cultural Resources	LTS/MM	-	=	-
Utilities and Service Systems	LTS	-	-	-

7. Alternatives to the Proposed Project

Table 7-2 Summary of Proposed Project and Alternatives

Topic	Proposed Project	Alternative 1: No Project	Alternative 2: Reduced Density	Alternative 3: Mixed Use
Wildfire				
<i>Short-Term Construction</i>	LTS/MM	-	=	-
<i>Long-Term Operation</i>	LTS	=	=	=
Superior to the Proposed Project?	n/a	Yes	Yes	Yes

Notes: NI: No impact; LTS: Less than Significant; LTS/M: Less than Significant with Mitigation Incorporated.
 (-) The alternative would result in less of an impact than the Proposed Project.
 (+) The alternative would result in greater impacts than the Proposed Project.
 (=) The alternative would result in the same/similar impacts as the Proposed Project.

Table 7-3 identifies the ability of the Proposed Project and each alternative to achieve Project objectives. As shown, the Proposed Project achieves all Project objectives without generating any significant environmental impact after mitigation. The No Project Alternative is environmentally superior, but does not achieve any of the Project objectives except #5, which relates to protecting the integrity of existing single-family neighborhoods. The Reduced Density Alternative would partially achieve the Project objectives and would be environmentally superior to the Proposed Project and the Mixed Use Alternative. The same mitigation measures identified for the Proposed Project would still be necessary.

The Mixed Use Alternative would achieve all of the Project objectives but not to the extent of the Proposed Project, and would also be environmentally superior to the Proposed Project, but not to the extent of the Reduced Density Alternative. The same mitigation measures identified for the Proposed Project would still be necessary.

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

Objective	Proposed Project	Alternative 1: No Project	Alternative 2: Reduced Density	Alternative 3: Mixed Use
1. Allow for the redevelopment of an existing underutilized retail center for residential uses.	YES	NO	YES	YES
2. Provide for additional market-rate and affordable housing opportunities consistent with the City's Housing Element and State housing goals.	YES	NO	NO	YES
3. Develop a high-quality residential neighborhood with a range of home sizes that accommodate a range of income levels to respond to local and regional housing needs and is compatible with the existing surrounding residential neighborhoods.	YES	NO	NO	YES
4. Reduce traffic volumes in the area and associated air quality, greenhouse gas, and noise impacts.	YES	NO	YES	YES
5. Protect the integrity of existing single-family neighborhoods.	YES	YES	YES	YES
6. Revitalize corridors offering a mix of land uses as an alternative to underutilized strip commercial development.	YES	NO	NO	YES

7. Alternatives to the Proposed Project

Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic Project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts” (CEQA Guidelines § 15126.6[c]). The reduction in residential units to 20 units would allow for the redevelopment of a currently underutilized retail center but would eliminate the opportunity to provide affordable housing in the Anaheim Hills area and accommodate a range of incomes in response to local and regional housing needs. Only single-family units would be developed under the Reduced Density Alternative, without any mixture of housing types and land uses. Therefore, this alternative would fail to meet half of the Project objectives. Because no significant and unavoidable impacts were identified, the alternative analysis evaluated the ability to avoid potentially significant impact with mitigation. Although this alternative is environmentally superior to the Proposed Project, it would not eliminate the impacts identified as potentially significant and would still require mitigation measures.

The Mixed Use Alternative would meet all of the Project objectives, but only partially, because only about 60 percent of the 3.03-acre site would be developed. And this alternative would not eliminate the impacts identified as potentially significant, and the same mitigation measures as the Proposed Project would be necessary.

7.7.1 References

Institute of Transportation Engineers (ITE). 2017. *Trip Generation Manual*. 10th edition.

7. Alternatives to the Proposed Project

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