

5.0 ALTERNATIVES

The California Environmental Quality Act (CEQA) requires that an EIR describe a reasonable range of alternatives to a proposed project, or to its location, that would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant environmental impacts identified for the project. A fundamental mandate of CEQA is that “public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of the project.” (PRC Section 21002 and Section 21081). Important considerations for this alternatives analysis are noted below and are incorporated herein pursuant to State CEQA Guidelines Section 15126.6.

This section includes discussion of three alternatives to the proposed Project to foster informed decisionmaking and public participation. As required under CEQA, this Draft EIR also evaluates the comparative merits of the alternatives that are carried forward for consideration. This chapter of the Draft EIR describes and evaluates project alternatives as required by CEQA. This chapter also identifies the Environmentally Superior Project Alternative as required by State CEQA Guidelines Section 15126.6(e)(2).

Under CEQA, alternatives do not need to be described or analyzed at the same level of detail as the proposed project (State CEQA Guidelines Section 15126.6(d)). However, they need to be described in enough detail to allow a comparative analysis of the alternatives against the proposed project. That is, it must be in sufficient detail for the Lead Agency to differentiate the impacts between the alternatives and to select the environmentally superior alternative.

The discussion of alternatives is subject to a rule of reason and the scope of alternatives to be analyzed must be evaluated on the facts of each case. Accordingly, analysis of the following three alternatives to the Project is provided to allow the decision-makers, interested organizations and members of the public to consider the Project in light of hypothetical alternative development options, thereby promoting CEQA’s purpose as an information disclosure statute.

This analysis is guided by the following considerations set forth under State CEQA Guidelines Section 15126.6:

- An EIR need not consider every conceivable alternative to a project;
- An EIR should identify alternatives that were considered by the lead agency, but rejected as infeasible during the scoping process;
- Reasons for rejecting an alternative include:
 - Failure to meet most of the basic project objectives;
 - Infeasibility; or
 - Inability to avoid significant environmental effects.

5.1 PROJECT OBJECTIVES

Section 15124(b) of the State CEQA Guidelines requires “[a] statement of objectives sought by the project. A clearly written statement of objectives will help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and would aid the decision makers in preparing findings or a statement of overriding considerations, if necessary. The statement of objectives should include the underlying purpose of the project and may discuss the project benefits.” Not only is a project analyzed in light of its objectives, but compatibility with project objectives is one of the criteria used in selecting and evaluating a reasonable range of project alternatives. Clear project objectives simplify the selection process by providing a standard against which to measure project alternatives.

The underlying purpose of the Project is to increase the availability of housing units in Anaheim. Specifically, the Project is proposed to meet the following Project objectives:

- OBJ-1: To provide additional multiple-family residential housing in an economically viable manner in an area that is otherwise predominantly single-family residential within the eastern portion of Anaheim near existing freeway interchanges and arterial streets.
- OBJ-2: To provide opportunities for development of the proposed commercial uses in a manner that complements and serves nearby developments.
- OBJ-3: To provide a multiple-family residential use with considerable amenities, near transportation corridors, commercial uses, and public recreational amenities.
- OBJ-4: To provide a clustered development with homes and commercial uses condensed into a smaller overall footprint that considers and accommodates topographical constraints, which protects the top of ridgelines; and allows for the remaining areas of the Project Site to be retained as open space with related aesthetic, scenic, and habitat qualities.
- OBJ-5: To develop the Project Site in a manner that maintains public views from Santa Ana Canyon Road and SR-91.
- OBJ-6: To develop the Project Site in a way that improves wildfire resilience for the Project’s residents, other users, and buildings within the Project Site, as well as neighboring properties by enhancing the existing street network, and providing fuel modification relating to vegetation, and non-combustible construction areas to help prevent wildfire spread to neighboring communities.
- OBJ-7: To improve bicycle, pedestrian, and equestrian connectivity through the provision of an additional trails and street/sidewalk improvements to facilitate access to the City’s existing trail system and park/recreational amenities (including Deer Canyon Park Preserve), as well as nearby residential and commercial developments.

5.2 SIGNIFICANT AND UNAVOIDABLE IMPACTS FOR THE PROJECT

As discussed within this Draft EIR, the Project would result in significant unavoidable impacts related to air quality, greenhouse gas (GHG) emissions, and transportation (VMT).

5.3 SELECTION OF ALTERNATIVES

The range of alternatives and methods for selection is governed by CEQA and applicable CEQA case law. As stated in the State CEQA Guidelines Section 15126.6(a), the lead agency is responsible for selecting a range of alternatives and must disclose its reasoning for selecting those alternatives. This chapter includes the range of Project alternatives that have been selected by the City as lead agency for examination, as well as its reasoning for selecting these alternatives, as required by CEQA.

The lead agency must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public. As stated in Section 15126.6(a) of the State CEQA Guidelines and as noted above, there is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason. This rule is described in Section 15126.6(f) of the State CEQA Guidelines and requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. As defined in Section 15126.6(f), the rule of reason limits alternatives analyzed to those that would avoid or substantially lessen one or more of the significant effects of a project. Of those alternatives, an EIR needs to examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. As noted above, other relevant provisions in the State CEQA Guidelines state that EIRs do not need to consider every conceivable alternative to a project, nor are they required to consider alternatives that are infeasible.

The lead agency may make an initial determination as to which alternatives are potentially feasible and, therefore, merit in-depth consideration, and which are clearly infeasible. Alternatives that are remote or speculative, or the effects of which cannot be reasonably predicted, need not be considered (State CEQA Guidelines, Section 15126.6(f)(3)).

In developing this alternatives analysis, the City, as lead agency, took into appropriate account the following:

- Identification of the Project's significant construction and operational impacts;
- Focus on finding alternatives that avoid or minimize those significant impacts;
- Consideration of any potentially feasible offsite locations;
- Consideration of any potentially feasible alternative site plans on the Project Site;
- Consideration of any potentially feasible reductions in Project size or intensity of uses;

- Consideration of any potentially feasible alternative construction methods or materials;
- Consideration of any alternative Project operations; and
- Confirmation of whether each alternative meets most of the basic project objectives.

The following analysis adheres to the foregoing requirements and is provided for each alternative to allow a meaningful comparison with the Project.

5.3.1 ALTERNATIVES CONSIDERED BUT REJECTED FROM FURTHER CONSIDERATION

The State CEQA Guidelines require that an EIR identify alternatives that were considered by the lead agency but rejected as infeasible, and thus not further considered, along with a brief explanation of the reasons underlying this determination. Among the factors that may be used to eliminate alternatives from further detailed consideration in the EIR are:

1. Failure to meet most of the basic project objectives,
2. Infeasibility,
3. Inability to avoid significant environmental impacts (State CEQA Guidelines Section 15126.6(c)), or
4. Implementation of the alternative is remote and speculative and the effects cannot be reasonably ascertained.

In accordance with 15126.6(c) of the State CEQA Guidelines, alternatives were considered by the City but rejected from further analysis due to one or more of the above reasons. Specifically, the City, as lead agency, took into appropriate account the following factors when considering the potential feasibility of alternatives:

- Site suitability for the proposed use(s);
- Economic viability;
- Availability of infrastructure to serve the Project Site;
- General plan consistency, other plans or regulatory limitations; and
- Whether the proponent can reasonably acquire, control or otherwise have access to an alternative site (or the site is already owned by the proponent).

A description of each potential alternative initially considered but ultimately not further evaluated, and the rationale for it being rejected from further consideration is provided below.

Alternative Site Alternative

Pursuant to Section 15126.6(f)(2) of the State CEQA Guidelines, the City considered the potential for alternative location(s) to the Project Site to construct and operate the Project. As stated in Section 15126.6(f)(2)(A) of the State CEQA Guidelines, the key question in analyzing potential alternative sites is whether any of the significant effects of the project would be avoided or substantially lessened by relocating the project. Only locations that would avoid or substantially lessen any of the significant effects of the project need to be considered in the EIR. Also, in addition to the specific considerations noted above, in accordance with State CEQA Guidelines Section 1516.6(f)(3), an alternative site need not be considered when implementation is “remote and speculative,” such as when the alternative site is beyond the control of a property owner/developer.

Potential Alternative Sites Considered

There are sites within the City that could be developed or redeveloped for residential and commercial uses. For example, in terms of housing development, the Candidate Sites are identified in the City of Anaheim Housing Element for the Sixth Cycle: 2021-2029 (City of Anaheim 2024f).

The primary constraint on the feasibility of this alternative is that the Property Owner/Developer does not own, control, or otherwise have access to any other sites and the ability to assemble sufficient lands would be remote and speculative. This is particularly the case here where the Project that is contemplated incorporates substantial amounts of open space retention as well as multi-use trail and roadway network improvements. To accomplish the foregoing, the Project’s site plan involves approximately 76 acres.

However, the residential portion of the Project Site could theoretically be developed on an alternative site within the City. Therefore, potential alternative sites were initially considered, as discussed below.

Ability For An Alternative Site Alternative To Meet Most Of The Project Objectives

An alternative site that had sufficient land available to allow for the contemplated residential development of up to 498 multiple-family units as well as six large-lot estate homes would achieve the underlying purpose of the Project, which is to increase the availability of housing units in Anaheim. Also, depending on the nature of the alternative site, this alternative could partially or wholly achieve OBJ-1, OBJ-2, and OBJ-3, which are:

- OBJ-1: To provide additional multiple-family residential housing in an economically viable manner in an area that is otherwise predominantly single-family residential within the eastern portion of Anaheim near existing freeway interchanges and arterial streets.
- OBJ-2: To provide opportunities for development of the proposed commercial uses in a manner that complements and serves nearby developments.

- OBJ-3: To provide a multiple-family residential use with considerable amenities, near transportation corridors, commercial uses, and public recreational amenities.

However, depending on the nature of the alternative site, this alternative would not likely achieve most of the Project's other objectives, including, for example, the following:

- OBJ-5, which is to develop the Project Site in a manner that maintains public views from Santa Ana Canyon Road and SR-91.
- OBJ-6, which is to develop the Project Site in a way that improves wildfire resilience for the Project's residents, other users, and buildings within the Project Site, as well as neighboring properties by enhancing the existing street network, and providing fuel modification relating to vegetation, and non-combustible construction areas to help prevent wildfire spread to neighboring communities.
- OBJ-7, which is to improve bicycle, pedestrian, and equestrian connectivity through the provision of an additional trails and street/sidewalk improvements to facilitate access to the City's existing trail system and park/recreational amenities (including Deer Canyon Park Preserve), as well as nearby residential and commercial developments.

Feasibility Of An Alternative Site Alternative/Implications for Environmental Impacts

In addition to concerns about an alternative site's ability to meet most of the Project objectives (as discussed above), the City has considered but ultimately rejected from further consideration an alternative site location for the following additional reasons.

1. There is no other similarly sized site (of approximately 76 acres) within the City's municipal boundaries that could be developed with all of the Project components, including the residential and commercial uses as well as designating more than half of the lands for open space.
2. The fact that there is not a similarly sized site available for development makes sense given the economic, legal and practical challenges of land assemblage within Anaheim. The Property Owner/Developer has invested years of effort to acquire parcels from individual owners that are large enough to support the residential, commercial and open space land uses that are proposed by the Project.
3. The Property Owner/Developer does not own or control another site within the City of comparable land area, and it is not reasonable to expect them to acquire or otherwise obtain an alternative site to construct the proposed housing, commercial and open space components in the City or nearby vicinity. One of the factors for feasibility of an alternative is "whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (State CEQA Guidelines Section 15126.6(f)(1))."
4. The size and nature of the site is critical to achieving most of the Project objectives.

5. Depending on the nature of the alternative site, there may be substantial ground disturbance similar to the Project; thus, combined with potential proximity of sensitive receptors, the scope of contemplated uses, and potential limited public transit opportunities, may equate to similar environmental impacts as compared to the proposed Project.

For these reasons, relocating the Project to an alternative site is not considered “potentially feasible” and thus the City, as lead agency, has decided not to carry forward an alternative site for further consideration.

Single-Family Residential Development Alternative

The City considered whether an alternative consisting solely of development of the southern portion of the Project Site with 34 single-family residences, similar to the Stonegate Project (Tentative Tract Map No. 16440) that was previously proposed and approved within a portion of the Project Site would be potentially feasible and thus warrant further evaluation.

This alternative would not include the designation of lands for open space nor would it include any multi-use trail or roadway network improvements that would occur with the proposed Project.

Ability For Single-Family Residential Alternative To Meet Most Of The Project Objectives

This alternative was dismissed given that it would fail to meet most of the Project’s objectives. For example, this alternative would not achieve OBJ-1, which is to provide additional multiple-family residential housing in an economically viable manner in an area that is otherwise predominantly single-family residential within the eastern portion of Anaheim near existing freeway interchanges and arterial streets. This alternative would also not achieve OBJ-2, which is to provide opportunities for development of the proposed commercial uses in a manner that complements and serves nearby developments. Nor would this alternative fulfill OBJ-3, which is to provide a multiple-family residential use with considerable amenities, near transportation corridors, commercial uses, and public recreational amenities. This alternative would also only partially achieve OBJ-4, which is to provide a clustered development with homes and commercial uses condensed into a smaller overall footprint that considers and accommodates topographical constraints, which protects the top of ridgelines; and allows for the remaining areas of the Project Site to be retained as open space with related aesthetic, scenic, and habitat qualities. This alternative would also not achieve OBJ-6, which is to develop the Project Site in a way that improves wildfire resilience for the Project’s residents, other users, and buildings within the Project Site, as well as neighboring properties by enhancing the existing street network, and providing fuel modification relating to vegetation, and non-combustible construction areas to help prevent wildfire spread to neighboring communities. Also, OBJ-7 would not be achieved with this alternative, which is to improve bicycle, pedestrian, and equestrian connectivity through the provision of an additional trails and street/sidewalk improvements to facilitate access to the City’s existing trail system and park/recreational amenities

(including Deer Canyon Park Preserve), as well as nearby residential and commercial developments.

***Feasibility Of A Single-Family Residential Development
Alternative/Implications for Environmental Impacts***

The Single-Family Residential Development alternative does not to be potentially feasible, as discussed below.

It would be speculative to assume that the Single-Family Residential Development alternative would be economically feasible. While this type of custom large lot housing product could potentially be sold for comparatively higher amounts (e.g., similar residences to the west of the Project Site are listed as of July 2024 for sale between \$1.75 million and \$2.25 million each), this does not take into account significant land costs associated with the purchase of the Project Site or the substantial infrastructure costs associated with this type of development.

The lack of likely feasibility is further bolstered by the fact that a similar project has already been fully approved by the City, including CEQA coverage and an approved final map; and yet, this development has not gone forward.

Moreover, in terms of environmental impacts, while this alternative would involve an overall reduction in intensity and density, which would reduce impacts to a certain degree, this alternative would: (1) still involve substantial ground disturbance and soil export; (2) not involve the designation of additional lands for open space; (3) not involve the installation of substantial multi-use trails and related roadway network improvements that would help to enhance connectivity.

5.1.1 ALTERNATIVES CARRIED FORWARD FOR CONSIDERATION

Pursuant to Section 15126.6 of the State CEQA Guidelines and as discussed further above, the City selected a reasonable range of potentially feasible alternatives to the Project that would feasibly attain most of the basic objectives of the Project but would avoid or substantially lessen one or more of the effects of the Project.

The three alternatives carried forward for detailed consideration are described below in sufficient detail to allow for meaningful evaluation, analysis, and comparison of the alternatives with the Project.

Alternative 1 – No Project/No Build

Description of Alternative 1

As required by State CEQA Guidelines Section 15126.6(e)(1), a No Project/No Build alternative was considered. State CEQA Guidelines Section 15126.6(e) requires EIRs to evaluate a “No Project Alternative,” which is The No Project alternative represents conditions in the study area in the absence of approval of the proposed project (State CEQA Guidelines Section 15126.6(e)(1)).

Under Alternative 1, the No Project/No Build alternative, the Project Site would remain as mostly undeveloped lands. The existing private paved maintenance access road (“Deer Canyon Road”) that is located within the western portion of the Project Site that connects to Santa Ana Canyon Road in the north would remain. There are also private dirt access roads throughout the Project Site that would remain. The limited ongoing fuel modification activities (i.e., basic vegetation management) that would be mandated to occur within the Project Site in accordance with AMC and Anaheim Fire & Rescue requirements are assumed to continue. With Alternative 1, there would be no installation of buildings or utility/roadway/trail network improvements and the Project Site would remain in its current state.

Ability For Alternative 1 To Meet Most Of The Project Objectives

Alternative 1 would fail to meet any of the Project’s objectives. Alternative 1 would not achieve OBJ-1, which is to provide additional multiple-family residential housing in an economically viable manner in an area that is otherwise predominantly single-family residential within the eastern portion of Anaheim near existing freeway interchanges and arterial streets. Also, Alternative 1 would also not achieve OBJ-2, which is to provide opportunities for development of the proposed commercial uses in a manner that complements and serves nearby developments. Nor would this alternative fulfill OBJ-3, which is to provide a multiple-family residential use with considerable amenities, near transportation corridors, commercial uses, and public recreational amenities. Alternative 1 would also not achieve OBJ-4, which is to provide a clustered development with homes and commercial uses condensed into a smaller overall footprint that considers and

accommodates topographical constraints, which protects the top of ridgelines; and allows for the remaining areas of the Project Site to be retained as open space with related aesthetic, scenic, and habitat qualities. Alternative 1 would also not achieve OBJ-6, which is to develop the Project Site in a way that improves wildfire resilience for the Project's residents, other users, and buildings within the Project Site, as well as neighboring properties by enhancing the existing street network, and providing fuel modification relating to vegetation, and non-combustible construction areas to help prevent wildfire spread to neighboring communities. Also, OBJ-7 would not be achieved by Alternative 1, which is to improve bicycle, pedestrian, and equestrian connectivity through the provision of an additional trails and street/sidewalk improvements to facilitate access to the City's existing trail system and park/recreational amenities (including Deer Canyon Park Preserve), as well as nearby residential and commercial developments.

Feasibility Of Alternative 1

Given that no development would occur under this alternative, Alternative 1 would not be considered to economically feasible given the substantial financial investment that the Property Owner/Developer has committed to the Project.

Furthermore, as discussed above, Alternative 1 would not meet most of the project objectives that are outlined above in Section 5.1, which is relevant since "feasibility" is evaluated through the lens of whether the alternative proposal can potentially feasibly be built while still achieving most of the project objectives.

Comparison of the Environmental Effects of Alternative 1 (No Project/No Build) to the Project

With Alternative 1, because no buildings would be constructed, no new uses would be introduced to the Project Site, and no utility, trail or roadway network infrastructure would be installed. Therefore, Alternative 1 would have fewer significant impacts than the proposed Project for all environmental topic areas.

Aesthetics

Alternative 1 would result in no temporary or permanent impacts to scenic vistas. Also, Alternative 1 would result in no impacts to the ridgelines and natural open space areas, which meet the definition of scenic resources pursuant to the City's Community Design Element, nor would Alternative 1 require the removal of any specimen trees or other vegetation within the Project Site.

The Project Site is visible from a City-designated scenic corridor, Santa Ana Canyon Road, and a State-designated scenic highway, SR-91, which are both to the north of the Project Site. Alternative 1 would result in no changes to public views of the Project Site.

Alternative 1 would involve no development; therefore, Alternative 1 would be consistent with scenic corridor requirements of the AMC.

Alternative 1 would not add any lighting or sources of glare within the Project Site.

Therefore, Alternative 1 would result in fewer impacts related to aesthetics than the proposed Project.

Air Quality

Alternative 1 would involve no construction activities; therefore, Alternative 1 would have no impact related to construction air quality emissions.

Alternative 1 would involve no changes in land uses within the Project Site that would increase or change vehicular trips to/from the Project Site; therefore, Alternative 1 would result in no impact related to operational air quality emissions.

Therefore, given it would have no temporary or permanent air quality impacts, Alternative 1 would not conflict with or obstruct implementation of any applicable air quality plan including the SCAQMD's 2022 AQMP nor would Alternative 1 result in a cumulatively considerable net increase of any criteria pollutants. Also, Alternative 1 would result in no impact related to the exposure of sensitive receptors to substantial pollutant concentrations.

Therefore, Alternative 1 would result in fewer impacts related to air quality than the proposed Project.

Biological Resources

Alternative 1 would involve no construction activities; therefore, Alternative 1 would result in no temporary removal of habitat for special status animal species. Also, Alternative 1 would result in no temporary impacts to wildlife related to human presence, noise, vibration, and dust.

Alternative 1 would involve no development. Therefore, Alternative 1 would result in no removal of vegetation within the Project Site or grading of the Project Site. No CDFW-classified sensitive natural community would be impacted by Alternative 1. No impacts to special status wildlife species would occur with Alternative 1 to species that could occur in the Project Site including Crotch's bumble bee, Coast Range newt, western spadefoot, Orange-throated whiptail, coastal California gnatcatcher, burrowing owl, and other wildlife species. Alternative 1 would result in no impacts to USFWS-designated critical habitat for coastal California gnatcatcher, which occurs on the Project Site. Alternative 1 would also result in no impacts to ephemeral streams that are located within the Project Site.

Therefore, Alternative 1 would result in fewer impacts related to biological resources than the proposed Project.

Cultural Resources

Alternative 1 would involve no construction activities such as ground disturbance or removal of structures.

Therefore, Alternative 1 would result in fewer impacts related to cultural resources than the proposed Project.

Energy

Alternative 1 would involve no construction activities that would use energy, nor would the Project result in any new land uses that would result in an increased demand for the use of energy or in new trips to/from the Project Site.

Therefore, Alternative 1 would result in fewer impacts related to energy than the proposed Project.

Geology and Soils

Alternative 1 would not result in any development within the Project Site; therefore, Alternative 1 would not expose people or structures to geological risks such as strong seismic ground shaking, seismic-related ground failure, landslides, etc.

The State Earthquake Zones of Required Investigation map indicates portions of the slopes within the Project Site are mapped with the potential for earthquake induced landslide hazard. Review of the CGS Landslide Inventory reports indicate the western and northern facing slopes within the Project Site have a high landslide susceptibility and are considered unstable. These slopes would remain with Alternative 1.

Alternative 1 would involve no drainage improvements and no stormwater capture or treatment best practices that would be implemented with the proposed Project.

Alternative 1 would involve no ground disturbance. Therefore, there is no potential for paleontological resources to be impacted by Alternative 1.

In summary, Alternative 1 would have fewer impacts related to geology and soils than the proposed Project.

Greenhouse Gas Emissions

Alternative 1 would involve no construction activities; therefore, Alternative 1 would result in no generation of GHG emissions related to construction.

Similarly, Alternative 1 would involve no changes in land uses within the Project Site that would increase or change vehicular trips to/from the Project Site or energy usage in the Project Site. Therefore, Alternative 1 would result in no impact related to operational greenhouse emissions.

In summary, Alternative 1 would have fewer impacts related to GHG emissions than the proposed Project.

Hazards and Hazardous Materials

Alternative 1 would not require any construction or ground disturbance. Therefore, Alternative 1 would not result in any increased hazards related to the transport, use, or disposal of hazardous materials.

Alternative 1 would not add new buildings or additional residents, employees, or other users to the Project Site; therefore, Alternative 1 would not impair implementation or physically interfere with any adopted emergency response or evacuation plans. Alternative 1 would not result in any delays to emergency response or evacuation. Also, Alternative 1 would not develop any new buildings; therefore, Alternative 1 would not expose any new buildings or people to risk of loss, injury, or death involving wildland fires.

In summary, Alternative 1 would have fewer impacts related to hazards and hazardous materials than the proposed Project.

Hydrology and Water Quality

Alternative 1 would result in no construction activities; therefore, there would be no potential for stormwater quality or stormwater quantity to change in the short-term as a result of Alternative 1.

Alternative 1 would involve no drainage improvements and no stormwater capture or treatment best practices, which would be implemented with the proposed Project. Alternative 1 would not alter the hydrology in the Project Site nor would Alternative 1 increase the amount of impervious surface within the Project Site. Therefore, Alternative 1 would have no impact related to operational hydrology and water quality.

In summary, Alternative 1 would have fewer impacts related to hydrology and water quality than the proposed Project.

Land Use and Planning

Alternative 1 would involve no construction activities that would have the potential to physically divide any established communities near the Project Site. Similarly, Alternative 1 would involve no new structures; therefore, Alternative 1 would have no permanent effects related to physically divided established communities.

The Project Site is currently zoned Single-Family Residential (RS-2), Open Space (OS), and Transitional (T) (City of Anaheim 2024a). Alternative 1 would not require any discretionary actions.

Alternative 1 would not conflict with any land use plans, policies, or regulations that have been adopted for the purpose of avoiding or mitigating an environmental effect.

Therefore, Alternative 1 would result in fewer impacts related to land use and planning than the proposed Project.

Noise

Alternative 1 would result in no construction activities; therefore, Alternative 1 would not cause any construction noise effects.

Alternative 1 would result in no development in the Project Site, there would be no new trips to/from the Project Site that could change operational traffic noise. Also, Alternative 1 would involve new land uses in the Project Site that would result in any new operational noise effects.

Therefore, Alternative 1 would result in fewer impacts related to noise than the proposed Project.

Population and Housing

Alternative 1 would result in no new housing being developed on the Project Site. Therefore, Alternative 1 would not induce any substantial unplanned population growth in the City. However, Alternative 1 would not provide any housing in furtherance of the City's RHNA allocation.

Alternative 1 would not require the displacement of existing housing in the Project Site nor would Alternative 1 displace any existing residents from the Project Site.

As such, Alternative 1 would have fewer impacts related to population and housing than the proposed Project. Public Services

Alternative 1 would involve no construction activities; therefore, Alternative 1 would not increase demand for public services temporarily.

The Project Site already requires the provision of public services and would continue to do so under Alternative 1. However, Alternative 1 would result in no new buildings, residents, or employees in the Project Site that would increase demand for police, fire, educational, and library services as would occur with the proposed Project.

Alternative 1 would not include emergency vehicle preemption or CCTV camera installation on Santa Ana Canyon Road between Weir Canyon Road and Imperial Highway to improve public service responses, which would occur with the proposed Project.

Therefore, Alternative 1 would have fewer impacts related to public services than the proposed Project.

Recreation

Alternative 1 would involve no changes in land uses within the Project Site that would increase or change demand for parks and other recreational facilities.

Alternative 1 would not provide new multi-use trails, sidewalks, and crosswalks to improve access to Deer Canyon Park Preserve as would occur with the proposed Project.

Therefore, Alternative 1 would result in fewer impacts related to recreation than the proposed Project.

Transportation

Alternative 1 would involve no construction activities; therefore, Alternative 1 would result in no trips to/from the Project Site during construction and resultant VMT. Also, there would be no temporary impacts to the transportation system with Alternative 1.

Similarly, Alternative 1 would involve no changes in land uses within the Project Site that would increase or change vehicular trips to/from the Project Site that could increase VMT in any way. However, Alternative 1 would not add sidewalks and a multi-use trail as would occur with the proposed Project.

Therefore, Alternative 1 would result in fewer impacts related to transportation than the proposed Project.

Tribal Cultural Resources

Alternative 1 would involve no ground disturbance. Therefore, there is no potential for tribal cultural resources to be affected by Alternative 1.

In summary, Alternative 1 would have fewer impacts related to tribal cultural resources than the proposed Project.

Utilities and Service Systems

Alternative 1 would involve no short-term construction activities that would require utilities.

Also, given that Alternative 1 would involve no development, operation of Alternative 1 would result in no increased usage of or demand for utilities or other service systems.

Therefore, Alternative 1 would have fewer impacts related to utilities and service systems than the proposed Project.

Wildfire

Alternative 1 would result in no changes within the Project Site that would substantially alter the likelihood or magnitude of wildfire risk or wildfire-related hazards. Alternative 1 would not introduce any people or structures into a Very High Fire Hazard Severity Zone. No changes to evacuation travel times would result from this alternative.

However, Alternative 1 would not reduce the amount of flammable vegetation in the Project Site near existing single-family residences to the west of the Project Site; would not establish and maintain fuel modification zones in the Project Site around new fire-hardened structures; would not provide new water distribution lines, fire hydrants, or fire access lanes in the Project Site.

Therefore, Alternative 1 would have fewer impacts related to wildfire than the proposed Project.

Alternative 2 – Reduced Development

Description of Alternative 2

Alternative 2 would consist of the following development components, which would reflect a substantial reduction in the overall scope of development as compared to the proposed Project. Specifically, Alternative 2 would include:

- A maximum total of 40,000 square feet of commercial would be developed instead of 80,000 square feet of commercial as proposed for the Project.
- The six single-family residences and supporting road proposed by the Project would not be developed. This would result in a reduction of approximately 227,509 cubic yards of soil export and a reduction of approximately 10.4 acres of ground disturbance. Instead, this alternative assumes that these 10.4 acres of the Project Site would instead be rezoned as open space.
- The Property Owner/Developer would limit the number of daily users of the multiple-family residential amenities to 50 or fewer non-resident members, which would result in no more than 100 total trips per day related to this aspect of the Project, which is less than the 438 trips that the Traffic Impact Assessment assumes would result from the membership aspect of the Project (LLG 2024a).
- This alternative assumes that the other Project improvements, including multi-use trail and roadway improvements would be installed similar to the Project.

The same regulatory requirements and mitigation measures as identified for the Project are assumed to be applicable to Alternative 2.

Comparative Assessment of Project Objectives Under Alternative 2

Alternative 2 would meet all the project objectives (albeit to a lesser degree in regard to the scope of commercial uses) that are outlined above in Section 5.1, Project Objectives, and listed below. In particular, this is because Alternative 2 would involve (1) the same number and type of residential housing that would continue to be clustered and sited primarily at the lower elevations; (2) a reasonable amount of commercial uses; and (3) the significant multi-use trail and related roadway network improvements. Following are the Project objectives that are relevant to this analysis.

- OBJ-1: To provide additional multiple-family residential housing in an economically viable manner in an area that is otherwise predominantly single-family residential within the eastern portion of Anaheim near existing freeway interchanges and arterial streets.

- OBJ-2: To provide opportunities for development of the proposed commercial uses in a manner that complements and serves nearby developments.
- OBJ-3: To provide a multiple-family residential use with considerable amenities, near transportation corridors, commercial uses, and public recreational amenities.
- OBJ-4: To provide a clustered development with homes and commercial uses condensed into a smaller overall footprint that considers and accommodates topographical constraints, which protects the top of ridgelines; and allows for the remaining areas of the Project Site to be retained as open space with related aesthetic, scenic, and habitat qualities.
- OBJ-5: To develop the Project Site in a manner that maintains public views from Santa Ana Canyon Road and SR-91.
- OBJ-6: To develop the Project Site in a way that improves wildfire resilience for the Project's residents, other users, and buildings within the Project Site, as well as neighboring properties by enhancing the existing street network, and providing fuel modification relating to vegetation, and non-combustible construction areas to help prevent wildfire spread to neighboring communities.
- OBJ-7: To improve bicycle, pedestrian, and equestrian connectivity through the provision of an additional trails and street/sidewalk improvements to facilitate access to the City's existing trail system and park/recreational amenities (including Deer Canyon Park Preserve), as well as nearby residential and commercial developments.

Comparison of the Environmental Effects of Alternative 2 (Reduced Development) to the Project

Aesthetics

Alternative 2 would result in temporary and permanent effects to scenic vistas to a similar extent as the proposed Project.

Alternative 2 would result in a similar degree of impacts to the ridgelines and natural undeveloped areas within the Project Site, which meet the definition of scenic resources pursuant to the City's Community Design Element. While there would be less overall development on the Project Site with Alternative 2, the general locations of proposed development would continue to be sited and clustered primarily in the lower elevations under both Alternative 2 and the proposed Project.

Alternative 2 would require the removal of approximately 69 specimen trees pursuant to the AMC, which is four fewer than the 73 specimen trees that would need to be removed for the proposed Project. Alternative 2 would be required to obtain a Specimen Tree Removal Permit from the City, which would include compensation for trees to be removed similar to the Project.

Alternative 2 would also require the removal of approximately 10.4 acres less of vegetation when compared to the proposed Project including the following vegetation communities: Sagebrush - Black Sage Scrub; Sagebrush - Black Sage Scrub / Ruderal; Coyote Brush Scrub; Toyon-Sumac Chaparral; Toyon-Sumac Chaparral / Ruderal Xeric Cliff Face.

The Project Site is visible from a City-designated scenic corridor, Santa Ana Canyon Road, and a State-designated scenic highway, SR-91, which are both to the north of the Project Site. Alternative 2 would result in similar changes to public views of the Project Site from Santa Ana Canyon Road and SR-91 except there would be 40,000 square feet less of commercial development visible and more open space.

Alternative 2 would have similar visual impacts to the proposed Project for public viewpoints on Santa Ana River Trail and Yorba Regional Park, although would be reduced to a certain degree given the overall reduction in the scope of development that would occur. For public viewpoints on Eucalyptus Drive and Deer Canyon Park Preserve, Alternative 2 would result in more views of open space and fewer views of single-family residential development that would be visible from these vantage points with the proposed Project.

Alternative 2 would involve development of residential, commercial and open space uses in the Project Site that would be similar to the proposed Project but at a lesser commercial intensity and without the single-family residences in the southern portion of the Project Site. Moreover, there would be more open space with the additional 10.4 acres that would be designated as open space (as compared to single-family uses proposed under the Project.) As with the Project, Alternative 2 would require approval of several discretionary actions including but not limited to a General Plan amendment and adoption of a specific plan for Alternative 2 to be consistent with applicable zoning and other regulations governing scenic quality, including the AMC and the Community Design Element of the City's General Plan.

Alternative 2 would add lighting and sources of glare within the Project Site to a similar extent as would the proposed Project, although would be reduced to a certain degree given the overall reduction in the scope of development that would occur.

Alternative 2 would include implementation of **MM AES-1**, which requires construction fencing be installed, and **MM AES-2**, which includes requirements for construction night lighting, and **MM AES-3**, which includes screening and aesthetic treatment requirements for retaining walls visible from Santa Ana Canyon Road, and **MM BIO-11**, which contains requirements for permanent lighting within the Project Site.

In summary, Alternative 2 would have fewer impacts related to aesthetics than the proposed Project.

Air Quality

As with the proposed Project, Alternative 2 would involve construction activities that would result in air quality emissions. Alternative 2 would result in fewer construction air quality emissions than the proposed Project given that Alternative 2 would require approximately 227,509 cubic yards less of soil export from the Project Site as well as the related truck trips and resultant air quality emissions. Also, Alternative 2 does not include construction of the

six single family homes that are proposed by the Project, which would further reduce air quality emissions below the levels that were calculated for the Project and presented in Section 4.2, Air Quality, of this Draft EIR. Construction air quality emissions would also be reduced by the reduction from 80,000 square feet of commercial with the proposed Project to 40,000 square feet of commercial with Alternative 2. This reduction in the size of the commercial area for Alternative 2 would generally cut the air quality emissions from construction of the commercial uses in half when compared to the construction emission of the commercial uses that were assumed for the proposed Project.

Alternative 2 would consist of the development and operation of a maximum total of 498 new residential units and 40,000 square feet of commercial space that would result in less than significant operational air quality emissions in most respects, similar to the proposed Project. Operational air quality emissions from these uses would primarily come from vehicles coming to/from the Project Site. Using the rates provided in the Project's Traffic Impact Analysis, Alternative 2 would result in approximately 490 fewer daily trips¹ when compared to the proposed Project. Given the reductions in commercial square footage and residential units and related reduction in daily trips, Alternative 2 would have a lesser impact than the proposed Project related to operational air quality emissions.

Alternative 2 would include the implementation of **MM AQ-1**, which requires the use of Tier 4 offroad engines during construction, and **MM AQ-2**, which requires that the Property Owner/Developer shall use super compliant paints, and **MM TRANS-1** through **MM TRANS--5**, which require implementation of measures to reduce VMT.

In summary, Alternative 2 would have fewer impacts related to air quality when compared to the proposed Project, which was identified as a significant unavoidable impact for the proposed Project.

Biological Resources

Similar to the proposed Project, Alternative 2 would involve construction activities and permanent improvements that would result in temporary and permanent impacts to biological resources. The primary difference between the proposed Project and Alternative 2 is that Alternative 2 would require the permanent removal of approximately 10.4 acres less of vegetation when compared to the proposed Project. Specifically, Alternative 2 would result in 10.4 acres fewer permanent impacts to the following vegetation communities: Sagebrush - Black Sage Scrub; Sagebrush - Black Sage Scrub / Ruderal; Coyote Brush Scrub; Toyon-Sumac Chaparral; Toyon-Sumac Chaparral / Ruderal Xeric Cliff Face. Given that these vegetation communities contain habitat for special status wildlife species, Alternative 2 would require the permanent removal of habitat for special status animal species but at a lesser extent than the proposed Project.

When compared to the proposed Project, Alternative 2 would result in fewer temporary impacts to wildlife that occur during construction that can result from increased human

¹ 490 fewer daily trips was determined by: (57 Daily 2-Way trips that would be eliminated by not building the single-family residential units)+(433 Daily 2-Way trips that would be eliminated by reducing from 80,000 square feet to 40,000 square feet of commercial land uses.

presence, noise, vibration, and dust given that the six single family homes in the southern portion of the Project Site would not be developed with Alternative 2, which is surrounded by undeveloped areas, some of which contains habitat for sensitive wildlife species.

Alternative 2 would result in a similar level of impacts to special status wildlife species as would occur with the proposed Project, except that Alternative 2 would result in approximately 10.4 acres less of impacts to vegetation communities. Species that could occur within these areas that would be avoided by Alternative 2 include: Crotch's bumble bee, Coast Range newt, western spadefoot, Orange-throated whiptail, coastal California gnatcatcher, burrowing owl, and other wildlife species.

The proposed Project would result in approximately 44.09 acres of impacts to USFWS-designated critical habitat for the coastal California gnatcatcher; whereas, Alternative 2 would result in approximately 33.49 acres of impacts to USFWS-designated critical habitat for coastal California gnatcatcher, which is 10.4 acres fewer of permanent impacts than the proposed Project. Furthermore, these portions of the Project Site that would be avoided by Alternative 2 are the areas of the Project Site that are nearest to the habitat in which a pair of coastal California gnatcatcher were observed mating within the Project Site in 2023.

Also, Alternative 2 would result in fewer permanent impacts (in terms of reduced acreage impacted) to ephemeral streams that are located within the southern portion of the Project Site, including Drainage 3, Drainage 4, and portions of Drainage 5. These drainages are depicted in the jurisdictional resources mapping provided in the Project's Biological Technical Report, which is provided as Appendix F.

By not developing the six single-family residences in the southern portion of the Project Site, Alternative 2 would preserve more habitat than the proposed Project, and Alternative 2 would result in reduced urban-edge impacts to natural communities and to wildlife in the southern portion of the Project Site that would have otherwise been exposed to additional lighting, human presence, noise, and other affects that would have come with the development of the six single family residences.

Alternative 2 would include implementation of **MM BIO-1** through **MM BIO-13**, which include measures to provide mitigation for impact natural communities/habitats and measures for minimizing impacts during construction and operation of the Project, including requirements for preconstruction biological surveys.

In summary, Alternative 2 would have fewer impacts related to biological resources than the proposed Project.

Cultural Resources

Similar to the proposed Project, Alternative 2 would result in ground disturbance that could result in the inadvertent discovery of historical resources, archaeological resources, and/or human remains. Alternative 2 would require approximately 10.4 acres less of grading; therefore, Alternative 2 has a lower likelihood of disturbing cultural resources than the proposed Project.

Alternative 2 would include implementation of **MM CUL-1**, which specifies the protocol to follow if human remains are identified within the Project Site during construction, and **MM CUL-2**, which includes requirements for archaeological monitoring during construction.

In summary, Alternative 2 would have fewer impacts related to cultural resources than the proposed Project.

Energy

As with the proposed Project, Alternative 2 would involve construction activities that would result in energy usage. Alternative 2 would result in a lesser degree of construction energy usage than the proposed Project given that Alternative 2 would require approximately 227,509 cubic yards less of soil export from the Project Site as well as the related truck trips and resultant energy usage. Also, Alternative 2 would require 10.4 acres less grading than the proposed Project and related energy usage. Also, Alternative 2 does not include construction of the six single family homes that are proposed by the Project, which would further reduce energy usage below the levels that were calculated for the Project and presented in Section 4.5, Energy, of this Draft EIR. Construction energy usage would also be reduced by the reduction from 80,000 square feet of commercial with the proposed Project to 40,000 square feet of commercial with Alternative 2. This reduction in the size of the commercial building for Alternative 2 would generally cut the energy usage from construction of the commercial uses in half when compared to the construction emission of the commercial uses that were assumed for the proposed Project.

Alternative 2 would result in the development and operation of a maximum total of 498 new residential units and 40,000 square feet of commercial space that would result in ongoing operational energy demand, similar to the proposed Project. Operational energy usage from these uses would primarily come from vehicles coming to/from the Project Site as well as from on-site energy usage. Using the rates provided in the Project's Traffic Impact Analysis, Alternative 2 would result in approximately 490 fewer daily trips when compared to the proposed Project. Alternative 2 would also include VMT reductions by limiting the number of trips for the non-resident use of amenities to a maximum of 50 round trips per day. Given the reductions in commercial square footage and residential units and related reduction in daily trips, Alternative 2 would have a lesser impact than the proposed Project related to operational energy usage.

It is assumed that **MM GHG-1** through **MM GHG-3** would be implemented as a part of Alternative 2, requiring usage of electricity instead of natural gas in most instances; on-site renewable power generation; and usage of green power offsets for electrical demand that is not generated on-site, as detailed more fully in Section 4.6, Greenhouse Gas Emissions.

In summary, Alternative 2 would have fewer impacts related to energy than the proposed Project.

Geology and Soils

Similar to the proposed Project, Alternative 2 would result in new development within the Project Site, which is prone to certain geological risks including strong seismic ground

shaking, seismic-related ground failure, and landslides. However, Alternative 2 would involve approximately 10.4 acres less of development when compared to the proposed Project, which would further reduce potential water quality effects to downstream receiving waters including the Santa Ana River during construction.

As with the proposed Project, the proposed buildings for Alternative 2 would be required to be designed in accordance with applicable provisions of the California Green Building Standards Code (CBSC 2023a). The California Green Building Standards Code contains stringent standards regulating the design and construction of excavations, foundations, retaining walls, and other building elements to control the effects of seismic ground shaking and adverse soil conditions. The California Green Building Standards Code also includes provisions for earthquake safety based on factors such as occupancy type, the types of soil and rock in the Project Site, and the strength of ground motion that may occur at the Project Site. Project implementation would also be required to be consistent with the recommendations outlined in the Geotechnical Investigation Report prepared for the Project. Compliance with the applicable laws and regulations, and compliance with proper grading, design, and building construction methods specified in the Geotechnical Investigation Report and as otherwise required under applicable laws and regulations would avoid and/or minimize, to the extent feasible, potential impacts related to strong seismic ground shaking and other geotechnical hazards.

The State Earthquake Zones of Required Investigation map indicates portions of the slopes within the Project Site are mapped with the potential for earthquake induced landslide hazard. Review of the CGS Landslide Inventory reports indicate the western and northern facing slopes within the Project Site have a high landslide susceptibility and are considered unstable. These slopes would be manufactured and/or retained with Alternative 2, reducing landslide risk in these areas, except for areas in the southern portion of the Project Site that would be left in place.

Alternative 2 would involve similar drainage improvements including stormwater capture and treatment best practices to those that would be implemented with the proposed Project. A lesser amount of impervious surface would be developed as part of Alternative 2 when compared to the proposed Project given that six single-family residences, an adjacent road, and 40,000 square feet of commercial would not be developed as part of Alternative 2. Instead, these areas would remain as pervious open space.

Similar to the proposed Project, Alternative 2 would result in ground disturbance that could result in the inadvertent discovery of paleontological resources. Alternative 2 would require approximately 10.4 acres less of grading than the proposed Project; therefore, Alternative 2 has a lower likelihood of disturbing paleontological resources than the proposed Project.

Alternative 2 would include implementation of **MM GEO-1**, which includes minimum requirements and next steps related to expansive soils testing that is needed prior to issuance of a grading permit, and **MM GEO-2**, which establishes the requirements for paleontological monitoring to be followed during construction.

In summary, Alternative 2 would have fewer impacts related to geology and soils than the proposed Project.

Greenhouse Gas Emissions

As with the proposed Project, Alternative 2 would involve construction activities that would result in GHG emissions. Alternative 2 would result in a lesser degree of construction GHG emissions than the proposed Project given that Alternative 2 would require approximately 227,509 cubic yards less of soil export from the Project Site as well as the related truck trips. Also, Alternative 2 would require 10.4 acres less grading than the proposed Project and related GHG emissions. Also, Alternative 2 does not include construction of the six single-family homes that are proposed by the Project, which would further reduce construction GHG emissions below the levels that were calculated for the Project and presented in Section 4.7, Greenhouse Gas Emissions, of this Draft EIR. Construction GHG emissions would also be reduced by the reduction from 80,000 square feet of commercial with the proposed Project to 40,000 square feet of commercial with Alternative 2. This reduction in the size of the commercial area for Alternative 2 would generally cut the construction GHG emissions from the commercial uses in half when compared to the construction emission of the commercial uses that were assumed for the proposed Project.

Alternative 2 would result in the development and operation of maximum total of 498 new residential units and 40,000 square feet of commercial space that would still result in ongoing operational GHG emissions, primarily attributed to the GHG emissions from vehicles coming to/from the Project Site as well as from other sources including on-site energy usage. Using the rates provided in the Project's Traffic Impact Analysis, Alternative 2 would result in approximately 490 fewer daily trips when compared to the proposed Project, which would directly reduce GHG emissions for Alternative 2. Alternative 2 would also include GHG emissions reductions by limiting the number of trips for the non-resident use of amenities to a maximum of 50 round trips per day.

As detailed more fully in Section 4.6, Greenhouse Gas Emissions, **MM GHG-1** through **MM GHG-3** would be implemented as a part of Alternative 2, requiring usage of electricity instead of natural gas in most circumstances; on-site renewable power generation; and usage of green power offsets for electrical demand that is not generated on-site. Also, **MM TRANS-1** through **MM TRANS-5** would be implemented, which are measures to reduce VMT.

In summary, Alternative 2 would have fewer impacts related to GHG emissions than the proposed Project.

Hazards and Hazardous Materials

Similar to the proposed Project, Alternative 2 would require construction and ground disturbance that would result in increased hazards related to the transport, use, or disposal of hazardous materials. Any hazardous materials that would be transported, used, stored, and/or disposed of by the Project would be done in accordance with regulatory requirements as specified in **MM HAZ-1**, **MM HAZ-2**, and **MM HAZ-3**.

Alternative 2 would add new buildings and additional residents, employees, and other users to the Project Site; therefore, Alternative 2 would result in additional evacuation traffic. However, as with the proposed Project, Alternative 2 would not impair implementation or physically interfere with any adopted emergency response or evacuation plans. Alternative 2 would result in an increase in the time it takes to evacuate during an emergency above baseline conditions; however, Alternative 2 would result in fewer impacts than the proposed Project related to evacuation given that Alternative 2 would involve 40,000 square feet less of commercial space and six fewer single-family residences. Also, Alternative 2 would involve development of new buildings; therefore, Alternative 2 would expose these new buildings and people to risk of loss, injury, or death involving wildland fires. However, as with the proposed Project, Alternative 2 would be designed with ignition resistant construction, fuel modification zones, fire hydrants, and other measures to minimize the risk of wildfire to proposed buildings and future site users.

Alternative 2 would include implementation of **MM HAZ-4**, which requires development and implementation of a Construction Management Plan.

Also, Alternative 2 would include implementation of **MM HAZ-5** would be implemented, which requires installation of CCTV cameras at intersections along Santa Ana Canyon Road.

MM HAZ-6 would be implemented as part of Alternative 2 to minimize wildfire risks to the residents of the existing residences west of the Project Site, which requires weed abatement along the entire western edge of the Project Site.

To facilitate quicker emergency evacuations from the Project Site, **MM HAZ-7** would be implemented as part of Alternative 2, which requires development and implementation of a project-specific wildfire evacuation and awareness plan.

As required by **MM HAZ-8**, the Property Owner/Developer shall fund and implement emergency vehicle preemption at traffic signals on Santa Ana Canyon Road from Weir Canyon Road to Imperial Highway.

Also, as required by **MM HAZ-9**, prior to issuance of a certificate of occupancy, the Property Owner/Developer shall participate through the payment of a fair share contribution to Anaheim Fire and Rescue to support education and outreach including community exercises in support of “Know Your Way” evacuation planning and protocols. The community education and outreach for the larger eastern portion of the City would help to improve the Community’s understanding of “Know Your Way”, which will better facilitate more efficient and safer future evacuation events.

In summary, Alternative 2 would have fewer impacts related to hazards and hazardous materials than the proposed Project.

Hydrology and Water Quality

As with the proposed Project, Alternative 2 would involve grading and other construction activities that could result in water quality impacts. However, Alternative 2 would involve approximately 10.4 acres less of ground disturbance and approximately 227,509 cubic yards

less of soil export, which would further reduce potential water quality effects to downstream receiving waters including the Santa Ana River during construction.

Alternative 2 would involve similar drainage improvements including stormwater capture and treatment best practices to those that would be implemented with the proposed Project. A lesser amount of impervious surface would be developed as part of Alternative 2 when compared to the proposed Project given that six single family residences, an adjacent road, and 40,000 square feet of commercial would not be developed as part of Alternative 2. Instead, these areas would remain as pervious open space.

In summary, Alternative 2 would have fewer impacts related to hydrology and water quality than the proposed Project. this Alternative and the proposed Project, impacts would be less than significant.

Land Use and Planning

Similar to the proposed Project, Alternative 2 would involve no work or buildings that would have the potential to physically divide any established communities near the Project Site. Alternative 2 would still involve the development of a multi-use trail along the south side of Santa Ana Canyon Road and a sidewalk along the north side of Santa Ana Canyon Road that would improve community connectivity.

Alternative 2 would involve development of residential, commercial and open space/recreational uses in the Project Site that would be the same as the proposed Project but at a lesser commercial intensity and without the single-family residences in the southern portion of the Project Site. As with the Project, Alternative 2 would require approval of several discretionary actions including but not limited to a General Plan amendment and adoption of a specific plan to be consistent with applicable zoning and other regulations including the AMC and the Community Design Element of the City's General Plan. Accordingly, similar to the proposed Project, Alternative 1 would not result in any significant land use and planning impacts due to a conflict with existing plans, policies or other regulations adopted for the purpose of avoiding or reducing environmental impacts.

In summary, Alternative 2 would have fewer impacts related to land use and planning than the proposed Project.

Noise

As with the proposed Project, Alternative 2 would result in construction activities that would cause construction noise effects.

Once built, Alternative 2 would result in similar land uses to the proposed Project; therefore, the noise effects of Alternative 2 would be similar to the noise levels described for the proposed Project in Chapter 4.11, Noise, of this Draft EIR, which was determined to be less than significant. Per AMC Section 6.70.010, "sound created by construction or building repair of any premises within the City shall be exempt from the applications of this chapter during the hours of 7:00 a.m. to 7:00 p.m. Additional work hours may be permitted if deemed necessary by the Director of Public Works or Building Official." Construction activities for

Alternative 2 would comply with the City's construction noise limits, noise from construction activities.

Also, Alternative 2 would result in approximately 490 fewer daily trips when compared to the proposed Project, which would directly reduce operational traffic noise for Alternative 2 when compared to the proposed Project although not changing the ultimate impact conclusion. Otherwise, operations would be similar under both this Alternative and the proposed Project.

In summary, Alternative 2 would have fewer impacts related to noise than the proposed Project.

Population and Housing

Alternative 2 would result in a maximum total of 498 new housing units being developed on the Project Site. As with the proposed Project, Alternative 2 would not induce any substantial unplanned population growth in the City because the increase in housing units and resultant increase in City population that is consistent with the assumptions contained in the City and SCAG's demographic projections.

Similar to the Project, Alternative 2 would not require the displacement of existing housing in the Project Site nor would Alternative 2 displace any existing residents from the Project Site.

In summary, Alternative 2 would result in similar impacts related to population and housing as would the proposed Project.

Public Services

Alternative 2 would involve new development in the Project Site; therefore, Alternative 2 would increase demand for public services temporarily and permanently, similar to the Project.

The Project Site already requires the provision of a small degree of public services and would continue to do so under Alternative 2. However, Alternative 2 would result in new buildings, residents, and employees in the Project Site that would increase demand for police, fire, educational, and library services above the existing baseline conditions. This demand would be similarly to, albeit less than the demand generated by the Project due to the reduction in density and intensity.

Alternative 2 would include emergency vehicle preemption as required by **MM HAZ-5** and CCTV camera installation on Santa Ana Canyon Road between Weir Canyon Road and Imperial Highway as required by **MM HAZ-8**, to improve public service response time.

In summary, Alternative 2 would have fewer impacts related to public services than the proposed Project.

Recreation

Alternative 2 would involve development of a maximum total of 498 new residential units and 40,000 square feet of commercial space that would increase demand for parks and other recreational facilities, albeit to a lesser degree given the reduced density/intensity as compared to the Project. It is most likely that future residents in the Project Site would use Deer Canyon Park Preserve to the greatest extent given its proximity to the Project Site for activities, such as walking, hiking, and bicycling, coupled with the enhanced access that would be provided by the Project to the Deer Canyon Park Preserve via the installation of a new multi-use trail. Future residents in the Project Site would also likely use Eucalyptus Park and Sycamore Park since these parks contain playgrounds, basketball courts, sports fields, and other amenities that would be different from the amenities anticipated to be available within the Project Site or at Deer Canyon Park Preserve.

Alternative 2 would rezone approximately 53.82 acres of the Project Site as Open Space, which is more than 70 percent of the total acreage of the Project Site. Also, as with the proposed Project, the multiple-family residential component of Alternative 2 would provide indoor amenity space, outdoor amenity space, and private balcony space for a grand total of approximately 126,922 sf, or 2.913 acres, of recreational-leisure space. The multiple-family residential building would include a rooftop deck with various indoor and outdoor amenities. For example, there would be an enclosed fitness center, locker rooms, restrooms, and a club area, as well as outdoor features such as a rooftop pool, firepits, BBQ areas, and a lounging area. The building would also include additional amenities such as a resident café, meeting and social gathering spaces, and communal resident “work from home” areas. Furthermore, the multiple-family residential uses would include two courtyards that have been incorporated into the design on its northern and southern ends of the building, which would also be landscaped with new trees, and would contain small gathering spaces with tables and chairs, small water features, and fire pits or fire tables. Also, each unit within the multiple-family residential building would also contain private balcony space, as noted above. In addition, similar to the Project, it is assumed this Alternative would involve compliance with the Anaheim Municipal Code through the payment of applicable park dedication fees in lieu of land dedication.

In summary, Alternative 2 would have fewer impacts related to recreation than the proposed Project.

Transportation

Alternative 2 would result in temporary impacts to the transportation system including temporary lane closures and additional construction traffic, similar to the Project. As required by **MM HAZ-4**, potential effects to local circulation and to emergency response times and to evacuation would be minimized through the preparation and implementation of a Construction Management Plan that would specify the methods by which traffic would be maintained along Santa Ana Canyon Road and other local roads throughout the Project’s construction process.

As with the proposed Project, Alternative 2 would result in new residential units and new commercial uses on the Project Site that would generate additional vehicular trips that would result in VMT generation that is above existing baseline conditions. However, when compared to the proposed Project, Alternative 2 would result in approximately 490 fewer daily trips when compared to the proposed Project, which would directly reduce the operational VMT for Alternative 2 when compared to the proposed Project. To minimize VMT, Alternative 2 would include implementation of VMT reduction measures **MM TRANS-1** through **MM TRANS-5**.

In summary, Alternative 2 would have fewer impacts related to transportation than the proposed Project.

Tribal Cultural Resources

Similar to the proposed Project, Alternative 2 would result in ground disturbance that could result in the inadvertent discovery of tribal cultural resources. Alternative 2 would require approximately 10.4 acres less of grading; therefore, Alternative 2 has a lower likelihood of disturbing tribal cultural resources than the proposed Project.

Alternative 2 would include implementation of **MM CUL-1**, which specifies the protocol to follow if human remains are identified within the Project Site during construction, and **MM TCR-1**, which establishes requirements for tribal monitoring of Project ground disturbing activities.

In summary, Alternative 2 would have fewer impacts related to tribal cultural resources than the proposed Project.

Utilities and Service Systems

Similar to the proposed Project, Alternative 2 would involve the relocation and the connection to existing utility systems within and adjacent to the Project Site. Coordination would occur with utility providers to minimize potential for any service disruptions.

As with the proposed Project, Alternative 2 would result in increased usage of and demand for utilities and other service systems, albeit to a lesser degree given the reduced development. Coordination with utility and service providers has confirmed capacity to provide service to the proposed Project; therefore, a smaller project (Alternative 2) with less square footage of commercial and fewer residential units would also be able to be accommodated by service providers.

In summary, Alternative 2 would have fewer impacts related to utilities and service systems than the proposed Project.

Wildfire

Alternative 2 would add new buildings and additional residents, employees, and other users to the Project Site; therefore, Alternative 2 would result in additional evacuation traffic albeit less given the reduced density/intensity. However, as with the proposed Project, Alternative

2 would not impair implementation or physically interfere with any adopted emergency response or evacuation plans. Alternative 2 would result in an increase in the time it takes to evacuate during an emergency above baseline conditions; however, Alternative 2 would result in fewer impacts than the proposed Project related to evacuation given that Alternative 2 would involve 40,000 square feet less of commercial space and six fewer single-family residences. Also, Alternative 2 would involve development of new buildings; therefore, Alternative 2 would expose these new buildings and people to risk of loss, injury, or death involving wildland fires. However, as with the proposed Project, Alternative 2 would be designed with ignition resistant construction, fuel modification zones, fire hydrants, and other measures to minimize the risk of wildfire to proposed buildings and future site users.

Alternative 2 would include implementation of **MM HAZ-4**, which requires development and implementation of a Construction Management Plan.

Also, Alternative 2 would include implementation of **MM HAZ-5** would be implemented, which requires installation of CCTV cameras at intersections along Santa Ana Canyon Road.

In summary, Alternative 2 would have fewer impacts related to wildfire than the proposed Project.

Alternative 3 – No Project/Existing General Plan

Description of Alternative 3

This Alternative 3 assumes development of the 76-acre Project Site with those uses that are currently allowed under existing General Plan designations. The Project Site currently contains a mix of General Plan land use designations which consist of Estate Density Residential; Low Density Residential; and Open Space (City of Anaheim 2023a).

For purposes of this analysis and given the somewhat general guidance associated with maximum density under several of the General Plan designations, it is assumed that a total of approximately 93 single-family detached residential units in total, consisting of lots ranging in size, including a significant number of large-lot estate homes, would be constructed. No multiple-family residential uses or commercial uses would be built. These residential units would not be clustered but rather spread throughout the approximately 76-acre Project Site. The lands currently designated as open space would remain, but no additional lands would be designated as open space. Also, while basic utility and roadway network infrastructure to serve the assumed uses would be built, this Alternative would not include the extensive multi-use trail and roadway network improvements contemplated under the Project.

The same regulatory requirements (including the City's local Scenic Corridor Overlay regulations) and similar mitigation measures as identified for the Project would be applicable to Alternative 3 to the extent triggered under CEQA.

Comparative Assessment of Project Objectives Under Alternative 3

Alternative 3 would meet certain project objectives to some degree but would not fully achieve most of the project objectives. In particular, this is because Alternative 3 (No Project/Existing General Plan and Zoning): (1) would involve no multiple-family residential uses with related amenities; (2) would involve only single-family, detached residential housing, much of which would be located on larger lots, which would not be clustered and sited primarily at the lower elevations but rather spread throughout the entire Project Site; (3) would not include any commercial uses; (4) would not include the multi-use trail and related roadway network improvements; and (5) would require substantial ground disturbance and grading across the entirety of the 76-acre Project Site, including at the higher elevations (albeit subject to applicable Scenic Corridor Overlay regulations). Moreover, the economic viability of Alternative 3 is questionable given, among other things, the inefficiencies involved in this type of low-density, single-family development on this type of topographically complicated site, substantial infrastructure costs, and potentially cost-prohibitive habitat mitigation requirements that could be imposed by applicable resource agencies.

Given the below Project objectives, the City determined that most would not be achieved under Alternative 3 (No Project/Existing General Plan and Zoning).

- OBJ-1: To provide additional multiple-family residential housing in an economically viable manner in an area that is otherwise predominantly single-family residential within the eastern portion of Anaheim near existing freeway interchanges and arterial streets.
- OBJ-2: To provide opportunities for development of the proposed commercial uses in a manner that complements and serves nearby developments.
- OBJ-3: To provide a multiple-family residential use with considerable amenities, near transportation corridors, commercial uses, and public recreational amenities.
- OBJ-4: To provide a clustered development with homes and commercial uses condensed into a smaller overall footprint that considers and accommodates topographical constraints, which protects the top of ridgelines; and allows for the remaining areas of the Project Site to be retained as open space with related aesthetic, scenic, and habitat qualities.
- OBJ-5: To develop the Project Site in a manner that maintains public views from Santa Ana Canyon Road and SR-91.
- OBJ-6: To develop the Project Site in a way that improves wildfire resilience for the Project's residents, other users, and buildings within the Project Site, as well as neighboring properties by enhancing the existing street network, and providing fuel modification relating to vegetation, and non-combustible construction areas to help prevent wildfire spread to neighboring communities.
- OBJ-7: To improve bicycle, pedestrian, and equestrian connectivity through the provision of an additional trails and street/sidewalk improvements to facilitate access to the City's existing trail system and park/recreational amenities (including Deer Canyon Park Preserve), as well as nearby residential and commercial developments.

Comparison of the Environmental Effects of the Alternative 3 to the Project

Aesthetics

Similar to the proposed Project, Alternative 3 would be developed pursuant to applicable General Plan and zoning requirements (and therefore not be in conflict in this regard), Alternative 3 would result in temporary and permanent effects to scenic resources to a greater extent than the proposed Project. As discussed further below, this is because Alternative 3 would involve traditional, low-density single-family development, much of which occurring on larger lots, spread across the entirety of the 76-acre Project Site rather than being clustered and sited primarily on the lower elevations of the Project Site.

During construction, Alternative 3 would have greater aesthetic impacts than the proposed Project because it would involve construction on a larger overall footprint with more grading, more vegetation removal, and more construction vehicles and equipment spread throughout the Project Site as compared to the proposed Project.

The 93 single-family, detached residences that would result from Alternative 3 would be spread across the entire Project Site as compared to the clustering and siting primarily on the lower elevations of the Project Site that is proposed by the Project. Therefore, development of Alternative 3 would have greater aesthetic impacts for viewers on Santa Ana Canyon Road and SR-91 than the proposed Project. These viewpoints would retain much of the Project Site as open space including scenic ridgelines within the Project Site. Alternative 3 would result in more visual impacts for public viewers from these perspectives. Also, Alternative 3 would require more grading, tree removal, and vegetation removal than the proposed Project that would result in greater aesthetic impacts.

Similar to the proposed Project, Alternative 3 would be required to adhere to the applicable local Scenic Corridor Overlay regulations.

Alternative 3 would not involve development of any structures greater than two stories within the Project Site, which would reduce aesthetic effects when compared to the proposed Project that would involve a seven-story multiple-family residential building near Santa Ana Canyon Road.

Alternative 3 would result in more impacts to the ridgelines and natural open space areas within the Project Site, which meet the definition of scenic resources pursuant to the City's Community Design Element. This is because 93 single-family residences and related improvements (including roadway and utility infrastructure) would be spread across the entire 76-acre Project Site, as compared to the proposed Project's site plan that would involve clustering and siting of development primarily at the lower elevations. Therefore, Alternative 3 would result in more impacts to scenic resources than the proposed Project.

Alternative 3 would require the removal of more specimen trees pursuant to the AMC than would the proposed Project. Both Alternative 3 and the proposed Project would be required to obtain a Specimen Tree Removal Permit from the City, which would include compensation for trees to be removed.

Alternative 3 would require the removal of more vegetation when compared to the proposed Project including the following vegetation communities: Sagebrush - Black Sage Scrub; Sagebrush - Black Sage Scrub / Ruderal; Coyote Brush Scrub; Toyon-Sumac Chaparral; Toyon-Sumac Chaparral / Ruderal Xeric Cliff Face.

The Project Site is visible from a City-designated scenic corridor, Santa Ana Canyon Road, and a State-designated scenic highway, SR-91, which are both to the north of the Project Site. Alternative 3 would result in a greater extent of visual change to public views of the Project Site from Santa Ana Canyon Road and SR-91 given that there would be more development in terms of overall coverage of the Project Site and less open space visible from the vantage points.

Alternative 3 would have similar visual impacts to the proposed Project for public viewpoints on Santa Ana River Trail and Yorba Regional Park. For public viewpoints on Eucalyptus Drive and Deer Canyon Park Preserve, Alternative 3 would result in a greater amount of development being visible than with the proposed Project, given that

development of a substantial number of single-family residences and related improvements (including roadway and utility infrastructure) would be spread across the entirety of the 76-acre Project Site, as compared to the Project's site plan that involves clustering primarily at the lower elevations.

Alternative 3 would add lighting within the Project Site to a greater extent than the proposed Project due to development being spread across the entirety of the 76-acre Project Site. Alternative 3 would not involve development of the multiple-family residential building that is proposed by the Project; therefore, glare effects would be reduced with Alternative 3 when compared to the proposed Project although under both Alternative 3 and the proposed Project, light and glare impacts would be less than significant.

Alternative 3 would include implementation of **MM AES-1**, which requires construction fencing be installed, and **MM AES-2**, which includes requirements for construction night lighting, and **MM AES-3**, which includes screening and aesthetic treatment requirements for retaining walls visible from Santa Ana Canyon Road, and **MM BIO-11**, which contains requirements for permanent lighting within the Project Site.

In summary, Alternative 3 would result in increased impacts related to aesthetics when compared to the proposed Project.

Air Quality

As with the proposed Project, Alternative 3 would involve construction activities that would result in air quality emissions. Alternative 3 could require a greater amount of soil export from the Project Site as well as a similar amount of related truck trips and resultant air quality emissions given that development would not be clustered and sited primarily at the lower elevations along with the nature of the utility and roadway infrastructure that would be necessary to serve this type of traditional, detached low-density single-family residential uses. Also, even though there would be an overall reduction in density and elimination of commercial uses, Alternative 3 would require a similar amount of overall building construction given that residential uses and related infrastructure would be spread across the entirety of the 76-acre Project Site. Therefore, it is reasonable to assume that it would result in similar construction air quality emissions when compared to the proposed Project.

Alternative 3 would result in the development and operation of approximately 93 new single-family, detached residential units and related infrastructure that would result in operational air quality emissions, similar to the proposed Project. Operational air quality emissions from these new residences would primarily come from vehicles coming to/from the Project Site. Using the rates provided in the Project's Traffic Impact Analysis, Alternative 3 would result in approximately 2,362 fewer daily trips² when compared to the proposed Project. Given the reductions in daily trips, Alternative 3 would have a lesser impact than the

² 2,362 fewer daily trips with Alternative 3 was determined by: Multiplying 93 single-family dwelling units by 9.43, which is the Daily 2-Way trip generation rate for single-family detached housing from the Project's Traffic Impact Analysis, which provides a result of 877 Daily 2-Way trips for Alternative 3. Then, the 877 Daily 2-Way Trips for Alternative 3 was subtracted from 3,239, which is the total proposed Project trip generation forecast.

proposed Project related to operational air quality emissions from transportation-related sources. However, given the nature of the contemplated low-density, single family uses w

In summary, Alternative 3 would result in reduced impacts related to air quality when compared to the proposed Project.

Biological Resources

Similar to the proposed Project, Alternative 3 would involve construction activities and permanent improvements that would result in temporary and permanent impacts to biological resources. The primary difference between the proposed Project and Alternative 3 is that Alternative 3 would require the permanent removal of much of the 76 acres of vegetation within the Project Site, when compared to the proposed Project, which would only result in 44.09 acres of permanent impacts to vegetation communities. This is because a substantial number of single-family residences and related improvements (including roadway and utility infrastructure) would be spread across the entirety of the 76-acre Project Site, as compared to the Project's site plan that involves clustering primarily at the lower elevations.

Specifically, Alternative 3 would result in greater permanent impacts to the following vegetation communities: Sagebrush - Black Sage Scrub; Sagebrush - Black Sage Scrub / Ruderal; Coyote Brush Scrub; Toyon-Sumac Chaparral; Toyon-Sumac Chaparral / Ruderal Xeric Cliff Face. Given that these vegetation communities contain habitat for special status wildlife species, Alternative 3 would require the permanent removal of more habitat for special status animal species than would the proposed Project.

Alternative 3 would result in similar temporary impacts to wildlife during construction as the proposed Project given the construction would still be occurring adjacent to undeveloped open space areas with habitat for special status wildlife species.

Alternative 3 would result in a greater level of impacts to special status wildlife species as would occur with the proposed Project, particularly given that Alternative 3 would result in approximately 31.91 acres more of permanent impacts to vegetation communities. Species that could occur within these areas that would be avoided by Alternative 3 include: Crotch's bumble bee, Coast Range newt, western spadefoot, Orange-throated whiptail, coastal California gnatcatcher, burrowing owl, and other wildlife species.

The proposed Project would result in approximately 44.09 acres of impacts to USFWS-designated critical habitat for the coastal California gnatcatcher; whereas, Alternative 3 would result in approximately 76 acres of impacts to USFWS-designated critical habitat for coastal California gnatcatcher. To implement Alternative 3, compensatory mitigation would need to be implemented in accordance with a Biological Opinion from the USFWS. It should be noted that there is a potential that the USFWS may not issue a Biological Opinion for the development of the entire 76-acre Project Site given that portions of the Project Site contain occupied and suitable coastal California gnatcatcher habitat. Furthermore, if USFWS were to issue a Biological Opinion for the entire 76 acres of the Project Site to be developed, it is reasonably foreseeable that this could result in Alternative 3 becoming economically

infeasible given that USFWS would reasonably require a minimum of a 1:1 compensatory mitigation ratio for impacted critical habitat, thereby making the required habitat mitigation potentially cost prohibitive (as noted above).

Also, Alternative 3 would result in more permanent impacts than would the proposed Project to ephemeral streams that are located throughout the Project Site, as depicted in the jurisdictional resources mapping provided in the Project's Biological Technical Report, which is provided as Appendix F. During the regulatory permitting process, it is reasonable to anticipate that CDFW and/or other regulatory agencies would require a minimum of 1:1 compensation for impacts to streambed areas, which would minimize the significance of these effects.

Alternative 3 would include implementation of **MM BIO-1** through **MM BIO-13**, which include measures to provide mitigation for impact natural communities/habitats and measures for minimizing impacts during construction and operation of the Project, including requirements for preconstruction biological surveys.

In summary, Alternative 3 would result in increased impacts related to biological resources than the proposed Project.

Cultural Resources

Similar to the proposed Project, Alternative 3 would result in ground disturbance that could result in the inadvertent discovery of historical resources, archaeological resources, and/or human remains. Alternative 3 would require more grading, when compared to the Project, across the entire 76-acre Project Site. Therefore, Alternative 3 has a greater likelihood of disturbing cultural resources than the proposed Project.

Alternative 3 would include implementation of **MM CUL-1**, which specifies the protocol to follow if human remains are identified within the Project Site during construction, and **MM CUL-2**, which includes requirements for archaeological monitoring during construction.

In summary, Alternative 3 would result in increased impacts related to cultural resources than the proposed Project.

Energy

As with the proposed Project, Alternative 3 would involve construction activities that would result in energy usage. Alternative 3 would result in a similar degree of construction energy usage than the proposed Project given that Alternative 3 would require more soil export from the Project Site as well as the related truck trips and resultant energy usage. Also, Alternative 3 would include construction activities for a similar amount of building square footage than is proposed by the Project because a substantial number of single-family residences and related improvements (including roadway and utility infrastructure) would be spread across the entirety of the 76-acre Project Site, as compared to the Project's site plan that involves clustering primarily at the lower elevations, which would result in similar construction and similar or lower operational energy usage to what was calculated for the Project and presented in Section 4.5, Energy, of this Draft EIR.

Alternative 3 would result in the development and operation of approximately 93 single-family, detached residential units and related infrastructure that would result in ongoing operational energy demand, similar to the proposed Project, or perhaps reduced to a certain degree given. Operational energy usage from these uses would primarily come from vehicles coming to/from the Project Site as well as from on-site energy usage. Using the rates provided in the Project's Traffic Impact Analysis, Alternative 3 would result in approximately 2,362 fewer daily trips when compared to the proposed Project. Given the reduction in daily trips, Alternative 3 would have a lesser impact than the proposed Project related to operational energy usage.

This analysis assumes that all of the single-family residences would be required to generate electricity on-site in accordance with Title 24 and other applicable requirements, which would further reduce inefficient energy usage for Alternative 3 when compared to the proposed Project.

In summary, Alternative 3 would result in fewer impacts related to energy than the proposed Project.

Geology and Soils

Similar to the proposed Project, Alternative 3 would result in new development within the Project Site, which is prone to certain geological risks including strong seismic ground shaking, seismic-related ground failure, and landslides. However, Alternative 3 would involve more grading than the proposed Project, which would further reduce potential water quality effects to downstream receiving waters including the Santa Ana River during construction.

As with the proposed Project, the assumed approximately 93 single-family, detached residences for Alternative 3 would be required to be designed in accordance with applicable provisions of the 2022 California Green Building Standards Code (CBSC 2023a). The California Green Building Standards Code contains stringent standards regulating the design and construction of excavations, foundations, retaining walls, and other building elements to control the effects of seismic ground shaking and adverse soil conditions. The California Green Building Standards Code also includes provisions for earthquake safety based on factors such as occupancy type, the types of soil and rock in the Project Site, and the strength of ground motion that may occur at the Project Site. This alternative assumes implementation would also be required to be consistent with the recommendations outlined in the relevant Geotechnical Investigation Report prepared. Compliance with the applicable laws and regulations, and compliance with proper grading, design, and building construction methods specified in the Geotechnical Investigation Report and as otherwise required under applicable laws and regulations would avoid and/or minimize, to the extent feasible, potential impacts related to strong seismic ground shaking and other geotechnical hazards.

The State Earthquake Zones of Required Investigation map indicates portions of the slopes within the Project Site are mapped with the potential for earthquake induced landslide hazard. Review of the CGS Landslide Inventory reports indicate the western and northern facing slopes within the Project Site have a high landslide susceptibility and are considered

unstable. Alternative 3 would require grading in the Project Site to achieve flat and compacted building pads throughout the Project Site, which would minimize risks of landslide susceptibility, similar to the proposed Project. Alternative 3 would require the development of an updated geotechnical report to reevaluate the grading and retaining wall that would need to be installed.

Alternative 3 would involve similar drainage improvements including stormwater capture and treatment best practices to those that would be implemented with the proposed Project. A greater amount of impervious surface would be developed as part of Alternative 3 when compared to the proposed Project given the additional roads and driveways and increase in size and number of rooftops (due to the single-family nature) that would be developed as part of Alternative 3 when compared to the proposed Project.

Similar to the proposed Project, Alternative 3 would result in ground disturbance that could result in the inadvertent discovery of paleontological resources. Alternative 3 would require more grading than the proposed Project; therefore, Alternative 3 has a greater likelihood of disturbing paleontological resources than the proposed Project.

Alternative 3 would include implementation of **MM GEO-1**, which includes minimum requirements and next steps related to expansive soils testing that is needed prior to issuance of a grading permit, and **MM GEO-2**, which establishes the requirements for paleontological monitoring to be followed during construction.

In summary, Alternative 3 would result in increased impacts related to geology and soils than the proposed Project.

Greenhouse Gas Emissions

As with the proposed Project, Alternative 3 would involve construction activities that would result in GHG emissions. For the reasons noted above, Alternative 3 would result in a similar degree of construction activities and resultant GHG emissions than the proposed Project given that Alternative 3 would require more soil export from the Project Site as well as an increase in the related truck trips and resultant GHG emissions. Also, Alternative 3 would include construction activities for a similar amount of building square footage than is proposed by the Project, which would result in there being similar (or perhaps greater) levels of construction and operational GHG emissions usage for Alternative 3 when compared with the levels that were calculated for the Project as presented in Section 4.7, Greenhouse Gas Emissions, of this Draft EIR.

Alternative 3 would result in the development and operation of approximately 93 single-family, detached residential units that would result in ongoing operational energy demand and related GHG emissions, similar to the proposed Project. Operational energy usage from these uses would primarily come from vehicles coming to/from the Project Site as well as from on-site energy usage. Using the rates provided in the Project's Traffic Impact Analysis, Alternative 3 would result in approximately 2,362 fewer daily trips when compared to the proposed Project. Given the reduction in daily trips, Alternative 3 would have a lesser impact than the proposed Project related to operational GHG emissions and related to VMT.

This analysis assumes that all of the single-family residences would be required to generate electricity on-site in accordance with Title 24 and other applicable requirements, which would further reduce GHG emissions for Alternative 3 similar to the proposed Project.

Alternative 3 would be required to implement mitigation similar to **MM TRANS-4**. **MM TRANS-4**, although would not include the multi-use trail improvements that are proposed by the Project. ***In summary, Alternative 3 would have fewer impacts related to GHG emissions than the proposed Project.***

Hazards and Hazardous Materials

Similar to the proposed Project, Alternative 3 would require construction and ground disturbance that would result in increased hazards related to the transport, use, or disposal of hazardous materials. Any hazardous materials that would be transported, used, stored, and/or disposed of as part of construction of Alternative 3 would be done in accordance with regulatory requirements as specified in **MM HAZ-1**, **MM HAZ-2**, and **MM HAZ-3**.

Alternative 3 would add new buildings and additional residents and other users to the Project Site; therefore, Alternative 3 would result in additional evacuation traffic. However, as with the proposed Project, Alternative 3 would not impair implementation or physically interfere with any adopted emergency response or evacuation plans. Alternative 3 would result in an increase in the time it takes to evacuate during an emergency above baseline conditions; however, Alternative 3 would result in fewer impacts than the proposed Project related to evacuation given that Alternative 3 would involve approximately 93 single-family, detached residences instead of 504 residential units overall and 80,000 square feet of commercial uses as is proposed with the Project. Also, Alternative 3 would involve development of new buildings; therefore, Alternative 3 would expose these new buildings and people to risk of loss, injury, or death involving wildland fires. However, as with the proposed Project, Alternative 3 would be designed with ignition resistant construction, fuel modification zones, fire hydrants, and other measures to minimize the risk of wildfire to proposed buildings and future site users.

Alternative 3 would include implementation of **MM HAZ-4**, which requires development and implementation of a Construction Management Plan, which would ensure adequate emergency access during construction.

Also, Alternative 3 would include implementation of **MM HAZ-5** would be implemented, which requires installation of CCTV cameras at intersections along Santa Ana Canyon Road.

MM HAZ-6 would be implemented as part of Alternative 3 to minimize wildfire risks to the residents of the existing residences west of the Project Site, which requires weed abatement along the entire western edge of the Project Site.

To facilitate quicker emergency evacuations from the Project Site, **MM HAZ-7** would be implemented as part of Alternative 3, which requires development and implementation of a project-specific wildfire evacuation and awareness plan.

As required by **MM HAZ-8**, the Property Owner/Developer shall fund and implement emergency vehicle preemption at traffic signals on Santa Ana Canyon Road from Weir Canyon Road to Imperial Highway as part of Alternative 3.

In summary, Alternative 3 would have fewer impacts related to hazards and hazardous materials than the proposed Project.

Hydrology and Water Quality

As with the proposed Project, Alternative 3 would involve grading and other construction activities that could result in water quality impacts. However, for the reasons discussed above, Alternative 3 would involve more ground disturbance, which would further increase the potential for water quality effects to downstream receiving waters including the Santa Ana River during construction.

Alternative 3 would involve similar drainage improvements including stormwater capture and treatment best practices to those that would be implemented with the proposed Project. A greater amount of impervious surface would be developed as part of Alternative 3 when compared to the proposed Project, which would increase stormwater generation. As with the proposed Project, stormwater best management practices would be implemented for Alternative 3 to capture, convey, and detain stormwater in accordance with applicable requirements.

In summary, Alternative 3 would result in increased impacts related to hydrology and water quality than the proposed Project.

Land Use and Planning

Similar to the proposed Project, Alternative 3 would involve no work or buildings that would have the potential to physically divide any established communities near the Project Site. Alternative 3 would still involve the development of a multi-use trail along the south side of Santa Ana Canyon Road and a sidewalk along the north side of Santa Ana Canyon Road that would improve community connectivity.

Alternative 3 would involve development of residential uses in the Project Site that would be developed at a lesser intensity (i.e., fewer units per acre) than what is proposed for the Project; however, rather than being consolidated and located primarily on the lower elevations these units would be spread across most of the Project Site with Alternative 3. There would be only traditional, single-family detached residential uses and would not involve any higher-density units or any mixed uses (in the form of commercial uses).

Alternative 3: (1) would involve no multiple-family residential uses with related amenities; (2) would involve only low density single-family, detached residential housing, much of which would be located on larger lots, which would not be clustered and sited primarily at the lower elevations. Instead, the residences would be spread throughout the entire 76-acre Project Site; (3) would not include any commercial uses; (4) would not include the significant multi-use trail and related roadway network improvements; and (5) would require substantial ground disturbance and grading across the entirety of the 76-acre Project Site,

including at the higher elevations (albeit subject to applicable Scenic Corridor Overlay regulations). Moreover, the economic viability of Alternative 3 is questionable given, among other things, the inefficiencies involved in this type of low-density, single-family development on this type of topographically complicated site, substantial infrastructure costs, and potentially cost-prohibitive habitat mitigation requirements that could be imposed by applicable resource agencies.

Thus, for relevant plans and policies encouraging higher density, mix of uses; clustering of uses; protection of scenic views, ridgelines, hilltops and similar scenic resources; incorporation of a commercial component; installation of enhanced bicycle and pedestrian connectivity, etc., Alternative 3 would not be consistent in this regard and therefore may have greater land use and planning impacts.

Alternative 3 would be consistent with existing zoning and land use classifications for the Project Site. The proposed Project, with approval of several discretionary actions including a general plan amendment and adoption of a specific plan, would also be consistent with applicable General Plan land use designations and zoning.

In summary, Alternative 3 would result in similar impacts related to land use and planning as would occur with the proposed Project.

Noise

As with the proposed Project, Alternative 3 would result in construction activities that would cause construction noise effects. Construction would be spread across the Project Site with this alternative, which would expose additional receptors to higher levels of construction noise than would occur for the proposed Project.

Once built, Alternative 3 would result in residential uses in the Project Site, which is similar to what is proposed by the Project. Therefore, the noise effects of Alternative 3 would be similar to the noise levels described for the proposed Project in Chapter 4.11, Noise, of this Draft EIR, which was determined to be less than significant.

Also, Alternative 3 would result in approximately 2,362 fewer daily trips when compared to the proposed Project, which would directly reduce operational traffic noise for Alternative 3 when compared to the proposed Project.

In summary, Alternative 3 would result in increased impacts related to construction noise than the proposed Project, and Alternative 3 would result in decreased impacts related to operational noise than the Project.

Population and Housing

Alternative 3 would result in approximately 93 new single-family, detached housing units being developed in the Project Site, which is fewer than the 504 units proposed by the Project. As with the proposed Project, Alternative 3 would not induce any substantial unplanned population growth in the City because the increase in housing units and resultant

increase in City population that is consistent with the assumptions contained in the City and SCAG's demographic projections.

Alternative 3 would not require the displacement of existing housing in the Project Site nor would Alternative 3 displace any existing residents from the Project Site.

In summary, Alternative 3 would result in a similar level of impacts related to population and housing as would the proposed Project.

Public Services

Alternative 3 would involve new development in the Project Site; therefore, Alternative 3 would increase demand for public services temporarily and permanently.

The Project Site already requires the provision of public services and would continue to do so under Alternative 3. However, Alternative 3 would result in new buildings, residents, and visitors in the Project Site that would increase demand for police, fire, educational, and library services above the existing baseline conditions.

Alternative 3 would involve development of new buildings; therefore, Alternative 3 would expose these new buildings and people to risk of loss, injury, or death involving wildland fires. However, as with the proposed Project, Alternative 3 would be designed with ignition resistant construction, fuel modification zones, fire hydrants, and other measures to minimize the risk of wildfire to proposed buildings and future site users.

Alternative 3 would include implementation of **MM HAZ-4**, which requires development and implementation of a Construction Management Plan, which would ensure adequate emergency access during construction.

Also, Alternative 3 would include implementation of **MM HAZ-5** would be implemented, which requires installation of CCTV cameras at intersections along Santa Ana Canyon Road.

MM HAZ-6 would be implemented as part of Alternative 3 to minimize wildfire risks to the residents of the existing residences west of the Project Site, which requires weed abatement along the entire western edge of the Project Site.

To facilitate quicker emergency evacuations from the Project Site, **MM HAZ-7** would be implemented as part of Alternative 3, which requires development and implementation of a project-specific wildfire evacuation and awareness plan.

As required by **MM HAZ-8**, the Property Owner/Developer shall fund and implement emergency vehicle preemption at traffic signals on Santa Ana Canyon Road from Weir Canyon Road to Imperial Highway as part of Alternative 3.

Also, as required by **MM HAZ-9**, prior to issuance of a certificate of occupancy, the Property Owner/Developer shall participate through the payment of a fair share contribution to Anaheim Fire and Rescue to support education and outreach including community exercises in support of "Know Your Way" evacuation planning and protocols. Community education

and outreach for the larger eastern portion of the City would help to improve the Community's understanding of "Know Your Way", which will better facilitate more efficient and safer future evacuation events.

In summary, Alternative 3 would result in reduced impacts related to hazards and hazardous materials than the proposed Project.

Recreation

Alternative 3 would involve approximately 93 new single-family, detached residential units that would increase demand for parks and other recreational facilities when compared to the existing demand generated by the undeveloped Project Site. This Alternative would not provide enhanced access to the Deer Canyon Park Preserve via the installation of a new multi-use trail or other multi-use trail or roadway network improvements.. Future residents in the Project Site would also likely use Eucalyptus Park and Sycamore Park since these parks contain playgrounds, basketball courts, sports fields, and other amenities that would be different from the amenities anticipated to be available within the Project Site or at Deer Canyon Park Preserve.

As with the Project, Alternative 3 would be required to comply with the AMC through the payment of applicable park dedication fees in lieu of land dedication.

In summary, Alternative 3 would result in similar impacts related to recreation as would the proposed Project.

Transportation

Alternative 3 would result in temporary impacts to the transportation system including temporary lane closures and additional construction traffic. As required by **MM HAZ-4**, potential effects to local circulation and to emergency response times and to evacuation would be minimized through the preparation and implementation of a Construction Management Plan that would specify the methods by which traffic would be maintained along Santa Ana Canyon Road and other local roads throughout the Project's construction process.

As with the proposed Project, Alternative 3 would result in new residential units on the Project Site that would generate additional vehicular trips that would result in VMT generation that is above existing baseline conditions. However, when compared to the proposed Project, Alternative 3 would result in approximately 2,362 fewer daily trips when compared to the proposed Project, which would substantially reduce the operational VMT for Alternative 3 when compared to the proposed Project. Alternative 3 would be required to provide basic roadway infrastructure to serve the assumed uses although the substantial multi-use trails and related roadway network improvements proposed as part of the Project would not be developed. Thus, it is reasonable to assume the Alternative would need to implement mitigation similar to **MM TRANS-4**. However, given the lack of transit as well as the limited methods that exist for mitigating VMT for single-family residential land uses, Alternative 3 would still likely result in significant unavoidable impacts related to VMT.

In summary, Alternative 3 would have fewer impacts related to transportation than the proposed Project.

Tribal Cultural Resources

Similar to the proposed Project, Alternative 3 would result in ground disturbance that could result in the inadvertent discovery of tribal cultural resources. Alternative 3 would require more grading than the proposed Project; therefore, Alternative 3 has a greater likelihood of disturbing tribal cultural resources than the proposed Project.

Alternative 3 would include implementation of **MM CUL-1**, which specifies the protocol to follow if human remains are identified within the Project Site during construction, and **MM TCR-1**, which establishes requirements for tribal monitoring of Project ground disturbing activities.

In summary, Alternative 3 would result in increased impacts related to tribal cultural resources than the proposed Project.

Utilities and Service Systems

Similar to the proposed Project, Alternative 3 would involve the relocation and the connection to existing utility systems within and adjacent to the Project Site. Coordination would occur with utility providers to minimize potential for any service disruptions.

As with the proposed Project, Alternative 3 would result in increased usage of and demand for utilities and other service systems. Coordination with utility and service providers has confirmed capacity to provide service to the proposed Project; therefore, a smaller project (Alternative 3) with fewer residential units and no commercial component would also be accommodated by service providers. ***In summary, Alternative 3 would have fewer impacts related to utilities and service systems than the proposed Project.***

Wildfire

Similar to the proposed Project, Alternative 3 would require construction and ground disturbance that would result in increased hazards related to the transport, use, or disposal of hazardous materials. Any hazardous materials that would be transported, used, stored, and/or disposed of as part of construction of Alternative 3 would be done in accordance with regulatory requirements as specified in **MM HAZ-1**, **MM HAZ-2**, and **MM HAZ-3**.

Alternative 3 would add new buildings and additional residents and other users to the Project Site; therefore, Alternative 3 would result in additional evacuation traffic. However, as with the proposed Project, Alternative 3 would not impair implementation or physically interfere with any adopted emergency response or evacuation plans. Alternative 3 would result in an increase in the time it takes to evacuate during an emergency above baseline conditions; however, Alternative 3 would result in fewer impacts than the proposed Project related to evacuation given that Alternative 3 would involve approximately 93 single-family, detached residences instead of 504 residential units overall and 80,000 square feet of commercial uses as is proposed with the Project. Also, Alternative 3 would involve

development of new buildings; therefore, Alternative 3 would expose these new buildings and people to risk of loss, injury, or death involving wildland fires. Moreover, because the residential uses would be dispersed throughout the Project Site rather than clustered, this could complicate emergency access and evacuation. However, as with the proposed Project, Alternative 3 would be designed with ignition resistant construction, fuel modification zones, fire hydrants, and other measures to minimize the risk of wildfire to proposed buildings and future site users.

Alternative 3 would include implementation of **MM HAZ-4**, which requires development and implementation of a Construction Management Plan, which would ensure adequate emergency access during construction.

Also, Alternative 3 would include implementation of **MM HAZ-5** would be implemented, which requires installation of CCTV cameras at intersections along Santa Ana Canyon Road.

MM HAZ-6 would be implemented as part of Alternative 3 to minimize wildfire risks to the residents of the existing residences west of the Project Site, which requires weed abatement along the entire western edge of the Project Site.

To facilitate quicker emergency evacuations from the Project Site, **MM HAZ-7** would be implemented as part of Alternative 3, which requires development and implementation of a project-specific wildfire evacuation and awareness plan.

As required by **MM HAZ-8**, the Property Owner/Developer shall fund and implement emergency vehicle preemption at traffic signals on Santa Ana Canyon Road from Weir Canyon Road to Imperial Highway as part of Alternative 3.

Also, as required by **MM HAZ-9**, prior to issuance of a certificate of occupancy, the Property Owner/Developer shall participate through the payment of a fair share contribution to Anaheim Fire and Rescue to support education and outreach including community exercises in support of “Know Your Way” evacuation planning and protocols. The community education and outreach for the larger eastern portion of the City would help to improve the Community’s understanding of “Know Your Way”, which will better facilitate more efficient and safer future evacuation events.

In summary, Alternative 3 would result in similar impacts related to wildfire to the proposed Project.

5.1.2 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

State CEQA Guidelines Section 15126.6(e)(2) indicates that an analysis of alternatives to a project shall identify an environmentally superior alternative among the alternatives evaluated in an EIR.

The State CEQA Guidelines also state that should it be determined that the “no project” alternative is the environmentally superior alternative, the EIR shall identify another environmentally superior alternative among the remaining alternatives.

A comparative summary of the environmental impacts associated with each alternative is provided in Table 5-1, Comparison of Alternatives. As shown, Alternative 1, the No Project/No Build alternative, would be the environmentally superior alternative, and Alternative 2, the Reduced Development alternative, would be the environmentally superior build alternative.

**TABLE 5-1
COMPARISON OF ALTERNATIVES**

Resource Topic	Proposed Project	Alternative 1 No Project/ No Build	Alternative 2 Reduced Development	Alternative 3 Existing General Plan
Aesthetics	Less Than Significant With Mitigation Incorporated	Fewer Impacts Than The Proposed Project	Fewer Impacts Than The Proposed Project	Increased Impacts Than The Proposed Project
Air Quality	Significant and Unavoidable Impact	Fewer Impacts Than The Proposed Project*	Fewer Impacts Than The Proposed Project*	Similar Impacts To The Proposed Project*
Biological Resources	Less Than Significant With Mitigation Incorporated	Fewer Impacts Than The Proposed Project	Fewer Impacts Than The Proposed Project	Increased Impacts Than The Proposed Project
Cultural Resources	Less Than Significant With Mitigation Incorporated	Fewer Impacts Than The Proposed Project	Fewer Impacts Than The Proposed Project	Increased Impacts Than The Proposed Project
Energy	Less Than Significant With Mitigation Incorporated	Fewer Impacts Than The Proposed Project	Fewer Impacts Than The Proposed Project	Fewer Impacts Than The Proposed Project
Geology and Soils	Less Than Significant With Mitigation Incorporated	Fewer Impacts Than The Proposed Project	Fewer Impacts Than The Proposed Project	Increased Impacts Than The Proposed Project
Greenhouse Gas Emissions	Significant and Unavoidable Impact	Fewer Impacts Than The Proposed Project*	Fewer Impacts Than The Proposed Project*	Fewer Impacts Than The Proposed Project*
Hazards and Hazardous Materials	Less Than Significant With Mitigation Incorporated	Fewer Impacts Than The Proposed Project	Fewer Impacts Than The Proposed Project	Fewer Impacts Than The Proposed Project
Hydrology and Water Quality	Less Than Significant Impact	Fewer Impacts Than The Proposed Project	Fewer Impacts Than The Proposed Project	Increased Impacts Than The Proposed Project
Land Use and Planning	Less Than Significant Impact	Fewer Impacts Than The Proposed Project	Fewer Impacts Than The Proposed Project	Similar Impacts To The Proposed Project
Noise	Less Than Significant Impact	Fewer Impacts Than The Proposed Project	Fewer Impacts Than The Proposed Project	Increased Construction Impacts Than The Proposed Project Fewer Operational Impacts Than The Proposed Project
Population and Housing	Less Than Significant Impact	Fewer Impacts Than The Proposed Project	Similar Impacts To The Proposed Project	Similar Impacts To The Proposed Project
Public Services	Less Than Significant With Mitigation Incorporated	Fewer Impacts Than The Proposed Project	Fewer Impacts Than The Proposed Project	Fewer Impacts Than The Proposed Project
Recreation	Less Than Significant Impact	Fewer Impacts Than The Proposed Project	Fewer Impacts Than The Proposed Project	Similar Impacts To The Proposed Project
Transportation	Significant and Unavoidable Impact	Fewer Impacts Than The Proposed Project*	Fewer Impacts Than The Proposed Project*	Fewer Impacts Than The Proposed Project*
Tribal Cultural Resources	Less Than Significant With Mitigation Incorporated	Fewer Impacts Than The Proposed Project	Fewer Impacts Than The Proposed Project	Increased Impacts Than The Proposed Project
Utilities and Service Systems	Less Than Significant Impact	Fewer Impacts Than The Proposed Project	Fewer Impacts Than The Proposed Project	Fewer Impacts Than The Proposed Project
Wildfire	Less Than Significant With Mitigation Incorporated	Fewer Impacts Than The Proposed Project	Fewer Impacts Than The Proposed Project	Similar Impacts To The Proposed Project

* An asterisk denotes a significant impact for the proposed Project that would be reduced or eliminated by an alternative.