SECTION 5.0 ALTERNATIVES TO THE PROPOSED PROJECT

5.1 <u>INTRODUCTION</u>

The California Environmental Quality Act (CEQA) requires that an EIR include a discussion of reasonable project alternatives that would "feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any significant effects of the project, and evaluate the comparative merits of the alternatives" (CEQA Guidelines Section 15126.6). This chapter identifies potential alternatives to the proposed project and evaluates them, as required by CEQA.

Key provisions of the CEQA Guidelines on alternatives (Section 15126.6[b] through [f]) are summarized below to explain the foundation and legal requirements for the alternatives analysis in the EIR.

- "...The discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objective, or would be more costly" (15126.6[b]).
- "The specific alternative of 'no project' shall also be evaluated along with its impact" (15126.6[e][1]). "The 'no project' analysis shall discuss the existing conditions at the time the Notice of Preparation is published, and at the time the environmental analysis is commenced, as well as what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. If the environmentally superior alternative is the 'no project' alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives" (15126.6[e] [2]).
- "The range of alternatives required in an EIR is governed by the 'rule of reason' that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making. Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent)" (15126.6[f]).
- For alternative locations, "only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR" (15126.6[f][2][A]).
- "If the lead agency concludes that no feasible alternative locations exist, it must disclose the reasons for this conclusion, and should include the reasons in the EIR. For example, in some cases there may be no feasible alternative locations for a geothermal plant or

mining project which must be in close proximity to natural resources at a given location" (15126.6[f][2][B]).

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

Pursuant to the guidelines stated above, a reasonable range of alternatives to the proposed project is considered and evaluated in this Draft EIR. These alternatives were developed by the City of Fullerton in the course of project planning and environmental review.

The following alternative has been considered and eliminated from detailed consideration for the reasons identified in Section 5.3.

Alternative Site

Alternatives that are considered in detail in this Draft EIR include:

- No Project/No Build Alternative
- No Project/Development Pursuant to Existing Zoning
- Reduced Density/Reduced Development Area (Phase 1 Only)
- Alternative Site Plan

5.2 **PROJECT OBJECTIVES**

CEQA Guidelines Section 15124(b) indicates that an EIR should include "a statement of objectives sought by the proposed project." As stated in Section 3.4, the following are the goals and associated objectives for the FTC Specific Plan.

Goal 1: Create buildings, public spaces, streets, and infrastructure that contribute to a sustainable built environment.

Objective 1A: Design projects that promote sustainable and green building and landscaping practices to achieve certification under the LEED Neighborhood Development Rating System.

Objective 1B: Design all new buildings to achieve the equivalency of certification under the most current version of the LEED for New Construction Rating System.

Objective 1C: Maintain the character and important features of designated Historic Buildings.

Objective 1D: Create buildings with an active and positive ground-floor presence along streets and civic spaces.

Objective 1E: Design contemporary and highly-articulated buildings that create a positive image for the Downtown.

Objective 1F: Improve and expand the existing circulation network to create a pedestrian-friendly environment that supports walking, bicycling and transit ridership.

Goal 2: Create a mixed-use neighborhood that contributes toward a sustainable Downtown economy.

Objective 2A: Increase the customer base for downtown businesses by increasing the resident and office population near the Train Depot.

Objective 2B: Improve the economic diversity of Downtown Fullerton by creating attractive commercial space near the Fullerton Train Depot.

Objective 2C: Enhance the long-term vitality, functionality, and desirability of Downtown properties by redeveloping underutilized properties near the Fullerton Train Depot.

Objective 2D: Create development regulations that allow a variety and mix of uses based on changing market conditions.

Objective 2E: Create development regulations that allow a mix of neighborhood-serving, transit-serving, and family-oriented retail uses, including a mix of national, regional, and independent retailers.

Goal 3: Create a mixed-use and transit-oriented neighborhood that contributes to a sustainable natural environment.

Objective 3A: Decrease dependency on the automobile by providing new housing, employment, shopping, dining, and recreational opportunities at the Fullerton Transportation Center.

Objective 3B: Encourage the reduction of per capita vehicle miles traveled and per capita greenhouse gas emissions (when compared to non-transit-oriented development) by increasing opportunities for walking, bicycling, and transit ridership.

Objective 3C: Improve access between bus and rail transit by creating an enhanced bus depot near the Fullerton Train Depot.

Objective 3D: Include pedestrian and bike connections as key elements in the project.

Objective 3E: Utilize low impact development techniques to improve the quality of stormwater runoff and to minimize impacts on downstream drainage systems.

Objective 3F: Ensure that all new development has a net zero impact (refer to Section 3.6.2 of the FTC Specific Plan) on the City's existing water supply sources.

Goal 4: Develop and promote a framework for a sustainable community lifestyle.

Objective 4A: As part of the mixed-use environment, incorporate cultural and civic spaces, such as a Transit Plaza, neighborhood parks, paseos, and courtyards.

Objective 4B: Develop outdoor spaces and amenities that accommodate the needs of various demographics, including commuters, residents, visitors, shoppers, and families with children.

Objective 4C: Diversify the City's housing options by providing a range of housing types that are affordable to a variety of income levels and contribute to the City's Regional Housing Needs Assessment (RHNA) obligation.

Objective 4D: Increase opportunities to meet the City of Fullerton's regional affordable housing allocations by increasing densities near the Downtown and the Fullerton Transportation Center.

Objective 4E: Provide outdoor areas for residents, visitors, and commuters that promote interaction and serve as community gathering spaces.

Objective 4F: Reflect the significance of the railroad, agriculture history, and music within civic spaces and streetscapes.

5.3 <u>ALTERNATIVES ELIMINATED FROM DETAILED CONSIDERATION</u>

Section 15126.6(c) of the CEQA Guidelines specifies that an EIR should (1) identify any alternatives that were considered by the lead agency but were eliminated from detailed consideration because they were determined to be infeasible during the scoping process and (2) briefly explain the reasons underlying the lead agency's determination. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (1) failure to meet most of the basic project objectives; (2) infeasibility; or (3) inability to avoid significant environmental impacts.

The feasibility of developing the project on an alternative site was reviewed and rejected during the scoping/project planning process. As described below, the main reason for rejecting an alternative site was that developing the project on an alternative site is not consistent with the project's main objectives and would not necessarily avoid or substantially reduce the impacts associated with the proposed project.

5.3.1 ALTERNATIVE SITE

Section 15126.6(f)(2)(A) of the CEQA Guidelines indicates that, in determining the consideration of an alternative location, "The key question and first step in analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR." Section 15126.6(f)(3) of the CEQA Guidelines further states "an EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative."

To meet the objectives of the proposed FTC Specific Plan, an alternative site would need to be of sufficient size to accommodate the project and its mix of land uses, would need to be located adjacent to the railroad right-of-way (to be transit-oriented), in the Downtown area of the City of Fullerton, and specifically near the Fullerton Train Depot. More than any other factor, the necessity of the project location including the Fullerton Train Depot essentially eliminates the feasibility of alternative sites.

As previously noted, only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR. In general, and as discussed further below, any development of the size and type proposed by the project and in the Downtown area would have substantially the same impacts, including significant and unavoidable air quality, noise, population/housing, and traffic impacts as the proposed project.

Because any alternative site meeting the project objectives would be within the same air basin (South Coast Air Basin) and near the proposed project site, this alternative would result in the same regional and local air quality emissions as the proposed project, including significant and

unavoidable local construction emissions of PM10 and PM2.5; regional operational emissions of VOC, PM10, and NOx; and, exposure of sensitive receptors to PM10 and PM2.5 emissions that exceed the 24-hour hour ambient air quality standard during construction. Due to the developed nature of the Downtown area of the City of Fullerton, and the phasing of development, it is anticipated that implementation of the proposed project on an alternative site would involve construction activities in proximity to sensitive receptors that would be substantially greater than the existing ambient noise levels, resulting in a significant and unavoidable noise impact. Development of the proposed land uses included in the FTC Specific Plan on an alternative site would result in an increase in population and housing within the City of Fullerton which would exceed existing projections, resulting in a significant and unavoidable impact similar to the proposed project. Development of the project on an alternative site in the same approximate area as of the proposed project (Downtown Fullerton) would generate a similar amount of traffic, and similar impacts at the same intersections/interchanges, including significant and unavoidable impacts at the intersection of Orangethorpe Avenue/Lemon Street.

In summary, an alternative site of adequate size and within a location that would substantively meet the project objectives would not substantially reduce or avoid impacts resulting from the proposed project. Therefore, further analysis of an alternatives site(s) in this Draft EIR is not required.

5.4 <u>ALTERNATIVES CARRIED FORWARD FOR DETAILED CONSIDERATION</u>

The analysis of each of the project alternatives identified below includes the following:

- A description of the alternative.
- An analysis of environmental impacts and a comparison to the possible impacts of the
 proposed project. Pursuant to the CEQA Guidelines, if an alternative would cause one or
 more significant effects in addition to those that would be caused by the project as
 proposed, the significant effects of the alternative shall be discussed, but in less detail
 than the significant effects of the project as proposed.
- An assessment of the alternative's ability to meet the project objectives (previously identified in Section 5.2).

The comparison of impacts between each alternative and the proposed project assumes that the general nature and types of existing Standard Conditions and Requirements (SCs), as well as Project Design Features (PDFs) and Mitigation Measures (MMs) identified in Section 4 for the proposed FTC Specific Plan would also be available for each of the build alternatives, where appropriate. No PDFs or MMs are applied to the No Project/No Build Alternative, which assumes that the existing conditions at the project site remain. Also, the alternatives analysis set forth in this Draft EIR provides two No Project Alternatives. The purpose of describing and analyzing a no project alternative is to allow decisionmakers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project.

5.4.1 NO PROJECT/NO BUILD ALTERNATIVE

Description of the Alternative

Consistent with CEQA Guidelines Section 15126.6(e)(3)(B), the No Project/No Build Alternative is the circumstance under which the project does not proceed. The No Project/No Build Alternative assumes the proposed General Plan and Zoning Code amendments for the FTC Specific Plan project area, and development under the proposed FTC Specific Plan would not

occur. Proposed mixed-use development, parking structures, infrastructure, and recreational facilities, etc. would not be implemented. The existing uses within the project area would remain in operation under the provisions of the existing General Plan and Zoning requirements.

Comparative Analysis of Environmental Impacts

Aesthetics

The No Project/No Build Alternative does not involve any development or change in current uses. There would be no change to the visual quality or character of the FTC Specific Plan project area or surrounding areas. The introduction of civic spaces and enhanced landscaping and streetscape amenities would not occur with this alternative. No significant aesthetic impacts related to visual change were identified for the proposed project and no significant aesthetic impacts would occur under this alternative.

Air Quality

The No Project/No Build Alternative would not involve any construction activities (including demolition, grading, and excavation). Therefore, this alternative would avoid short-term significant and unavoidable construction-related local and long-term significant and unavoidable operation-related regional air quality impacts that would occur with the proposed project due to the exceedance of South Coast Air Quality Management District (SCAQMD) thresholds. Both this alternative and the proposed project would generate long-term air quality emissions associated with vehicular and operational activities; however, implementation of the proposed project would substantially increase vehicular traffic over existing levels associated with on-site land uses.

Cultural Resources

The No Project/No Build Alternative would not involve any excavation or grading activities; therefore, the potential to discover previously unidentified archaeological or paleontological resources is eliminated. In addition, because the FTC Specific Plan project area would remain in its current condition, no potential direct or indirect impacts to historic resources would occur. These impacts are mitigated to a level considered less than significant with the proposed project.

Geology and Soils

The No Project/No Build Alternative would not involve grading or excavation activities that would be required to develop land uses allowed under the proposed project and potential less than significant impacts associated with the proposed project would be avoided. Because existing land uses would remain under this alternative, fewer people would be exposed to seismic activity within the project area compared to the proposed project. Geology and soils impacts from the proposed project were determined to be less than significant with incorporation of the mitigation program.

Hazards and Hazardous Materials

Implementation of the proposed project would involve construction activities that have the potential to encounter hazardous materials resulting from historical and/or current land uses on or near the project area, including: documented releases of various contaminants in the project area (primarily petroleum hydrocarbons), a regional VOC-impacted groundwater plume, 23 identified properties that have buildings that may contain asbestos-containing materials (ACM)

and/or lead-based paint (LBP); and a potential to encounter polychlorinated biphynols (PCBs) based on historical use on the site. Under this alternative, all on-site structures would remain intact and as long as materials are not disturbed. No impacts related to hazardous materials exposure to construction workers or occupants would occur unless there is a release of hazardous materials that occurs with the passage of time which had not been prevented for lack of commencing the project. Potential project impacts related to hazards and hazardous materials are mitigated to a level considered less than significant.

Hydrology and Water Quality

Under this alternative, the existing hydrology patterns and hydrologic characteristics of the project site would remain. The proposed project would reduce the amount of storm water runoff from the project area and decrease demands on the existing storm drain system by increasing the amount of pervious area in conjunction with water quality Best Management Practices (BMPs) related to Low Impact Development (LID) practices. Therefore, while this alternative would also have no adverse impact, there would be no reduction in storm water runoff and no implementation of water quality BMPs. Because this alternative would not include any grading and construction, there would be no potential for construction-related water quality impacts, which would be less than significant for the proposed project through compliance with regulatory requirements.

Land Use and Planning

Under this alternative, the existing land uses would be retained. A change in land use would not occur and a General Plan Amendment or zone change would not be needed. This alternative would not result in any direct or indirect land use impacts and would not conflict with the goals and policies outlined in the City's General Plan. However, this alternative would not achieve goals of the relevant plans and programs of the City or SCAG regarding the redevelopment and revitalization of the Downtown area and the encouragement of mixed use developments (refer to planning programs discussed in Section 4.7, Land Use and Planning). Although adverse, this would not represent a significant impact. The proposed project, however, does support these goals and objectives. As with the proposed project, this alternative would not result in any significant land use impacts.

Noise

The No Project/No Build Alternative would not involve any construction activities; therefore, noise and vibration effects associated with project construction and operation would not occur. Additionally, the incremental increase in long-term, traffic-related, and operational noise levels associated with the proposed project would not occur. However, noise impacts from implementation of the proposed project would be mitigated to less than significant levels.

Population, Housing, and Employment

Under this alternative, no housing or additional employment opportunities would be provided and there would be no change in the amount or rate of growth expected in the City. This alternative would avoid the significant growth impact resulting from implementation of the proposed project. Without the project, the City's goals and objectives to provide diversified housing of all types and tenures (type and price), as set forth in its recently adopted 2006-2014 Housing Element certified by HCD, would be severely hindered. To meet the City's Regional Housing Needs Assessment (RHNA) obligations, the Housing Element identifies numerous parcels within the FTC Specific Plan area as target sites for rezoning to accommodate new residential development through infill redevelopment. The rezoning would be to densities that

cover very low- and low-income RHNA allocations. Retention of the project area in its existing condition with no General Plan Amendment or Zone Change allowing for development under the FTC Specific Plan would not contribute toward achieving the City's RHNA targets.

Public Services and Recreation

The No Project/No Build Alternative would not place new demands on public services (fire protection, police protection, schools, libraries and parks/recreation) because no new development would occur. Potential impacts from the proposed project were determined to be less than significant with incorporation of the identified SCs, PDFs, and MMs.

Transportation and Traffic

The No Project/No Build Alternative would not change the existing circulation conditions because no new development within the FTC Specific Plan area would occur. No short-term (construction) or long-term (operational) traffic trips would be generated. Therefore, the significant impact to the intersection of Orangethorpe Avenue and Lemon Street that occurs when the City of Anaheim methodology for traffic analysis is used would be avoided. Under this alternative, vehicular, parking, and pedestrian and bicycle improvements proposed as part of the project would not be implemented; however, no impacts would occur. Additionally, there would be no change to the operations of the Orange County Transportation Authority (OCTA) Bus Depot, although the project would have a less than significant impact on OCTA services. As with the proposed project, operations at the Fullerton Train Depot would not be altered.

Utilities and Service Systems

The No Project/No Build Alternative would not place new demands on local and regional utilities and service systems because no new development would occur on the project site. Under this alternative, no utility upgrades would occur and no physical impacts would result. The impacts to utilities under the proposed project would be less than significant.

Greenhouse Gas Emissions

This alternative would not change or increase the amount and type of greenhouse gas (GHG) emissions generated by on-site uses and occupants and would avoid the less than significant impact associated with GHG emissions resulting from the proposed project. However, it should be noted that this alternative would not promote new development in compliance with Senate Bill 375 which envisions compact, complete, and efficient land use development, and would not implement new development near train and bus facilities which has the positive benefit of reducing vehicle miles traveled compared to the same development in another area.

Conclusion

Avoid or Substantially Lessen the Significant Impacts of the Project

The No Project/No Build Alternative would avoid all of the significant unavoidable impacts that would occur with implementation of the proposed project, including (1) short-term, construction-related local air quality impacts (PM10 and PM2.5); (2) long-term operational regional air quality impacts (VOC, PM10, and NOx); (3) short-term construction-related noise impacts; (4) population/housing growth; and (5) traffic impact at the intersection of Lemon Street and Orangethorpe Avenue. For the remaining topical issues, the proposed project has less than significant impacts or potentially significant impacts that can be mitigated to a level considered less than significant.

Attainment of Project Objectives

Despite the avoidance of significant project impacts, this alternative would not meet any of the project objectives identified in Section 5.2. Specifically, this alternative would not: create buildings, public spaces, streets, and infrastructure that contribute to a sustainable built environment; create a mixed-use neighborhood that contributes toward a sustainable Downtown economy; create a mixed-use and transit-oriented neighborhood that contributes to a sustainable natural environment; or develop and promote a framework for a sustainable community lifestyle. This alternative would not involve the introduction of new civic spaces, enhanced pedestrian and bicycle facilities, enhanced landscaping and street amenities, implementation of water quality protection features, or assist the City in meeting regional affordable housing allocations.

5.4.2 NO PROJECT/DEVELOPMENT PURSUANT TO EXISTING ZONING

Description of the Alternative

CEQA Guidelines Section 15126.6(e)(3)(A) identifies the No Project Alternative as the "continuation of the existing plan, policy or operation into the future. Typically this is a situation where other projects initiated under the existing plan will continue while the new plan is developed. Thus, the projected impacts of the proposed plan or alternative plans would be compared to the impacts that would occur under the existing plan". This alternative assumes future development of the project area consistent with the existing City of Fullerton zoning designations.

This alternative would allow for redevelopment within the project area under the provisions of the existing zoning regulations and not the FTC Specific Plan, which includes form-based development standards within the Regulating Code. Form-based regulations are different from conventional zoning regulations in that they emphasize the design of buildings and how building frontages relate to streets and public spaces, rather than focusing primarily on allowed uses and the density and intensity of development. Form-based regulations also establish standards for the design of streets and public spaces. When form-based building standards, street standards, and public space standards are used, a specific pattern of development can be achieved in accordance with the envisioned future of the neighborhood or district. The form-based regulations within the Regulating Code are intended to produce the City's envisioned types of developments within the FTC Specific Plan area. In addition to providing standards for streets and alleys, civic spaces, and buildings, the Regulating Code provides architectural standards and guidelines, landscape standards and guidelines, and general standards (standards that apply to all developments regulated by the code).

This alternative assumes development of the entire approximate 39-acre FTC Specific Plan project area under the current zoning, as shown in Exhibit 3.2-16 in Section 3, Project Description: Central Business District Commercial (C-3), General Commercial (C-2), Public Land (P-L), and General Manufacturing (M-G). The Zoning Code does not establish maximum development potential for the P-L zone. Therefore a development potential was estimated based on existing administrative government facilities (City Hall), and an assumption that development of P-L zoned lands in downtown, adjacent to public transit, would at least be of a similar nature. The Zoning Code does not establish a maximum number of dwelling units for the mixed-use C-3 zone; but it does identify a maximum floor area ratio (FAR) allowed. The maximum development potential within the FTC Specific Plan project area is estimated based on the FAR allowed in each zone, and an estimated maximum density for properties in the C-3

zone of 80 dwelling units/acre (du/ac)¹ (based on the density of existing mixed-use projects in Downtown Fullerton). This approach is a basic consideration of potential development intensity under the existing zoning, and assumes that all properties in the FTC Specific Plan area would be redeveloped. The development potential does not factor in buildings that are to remain as part of the FTC Specific Plan proposed (such as single-resident occupancy [SRO], historic buildings, etc.). Based on these assumptions, the estimated development potential for the FTC Specific Plan project area under this alternative is shown in Table 5-1.

TABLE 5-1

MAXIMUM DEVELOPMENT POTENTIAL

NO PROJECT/DEVELOPMENT PURSUANT TO EXISTING ZONING

			Development Potential	
Zone	Total Lot Area	SF Allowed at Max. FAR	Maximum Estimated DU/AC	Net SF Allowed at Max. FAR
C-2/General Commercial	64,889	45,422	N/A	45,422
C-3/Central Business District Commercial	158,989	635,956	292	329,356
M-G/General Manufacturing	513,059	461,753	N/A	461,753
P-L/Public Land	294,140	102,949	N/A	102,949
Total SF	1,031,077			
Total Acres	23.7 ^{a.}			

Numbers are approximate

DU - dwelling unit

SF – square feet

FAR - floor to area ratio

N/A – not applicable

In addition to the land uses identified in Table 5-1, this alternative would include new parking as required to comply with the City's zoning requirements for individual land uses. It should also be noted that the protection of historic resources included as a requirement of the FTC Specific Plan would not apply to development under this alternative; however, provisions of the City of Fullerton Landmark Ordinance (Chapter 15.48 of the Municipal Code) would apply. Similarly, the noise standards established by the FTC Specific Plan would not be applicable to development under this alternative, rather only the provisions of the existing Noise Ordinance would apply.

Comparative Analysis of Environmental Impacts

Aesthetics

As noted above, development within the project area under this alternative would be subject to existing City requirements, and not the form-based Regulating Code of the FTC Specific Plan. Although this alternative would involve substantially more non-residential development than the proposed project, any new development would be subject to the City's existing design review process. Developers would be required to submit architecture (elevations, floor plans, and site

5-10

a. The remaining 15.3 acres within the 39-acre FTC Specific Plan area consist of right-of-way for roadways and the railroad.

This equates to 292 total dwelling units in the C-3 zoned properties within the FTC Specific Plan area. Assuming 1,050 sf gross floor area per unit (consistent with the FTC Specific Plan unit/sf ratio), the gross floor area necessary to accommodate 292 units is 306,600 gsf. This gross area has been subtracted from the maximum FAR allowed in the C-3 zone, and the remainder (net) FAR is the maximum commercial development potential allowed on a site.

plan), landscape architecture (concept planting and hardscape plans), and paint and material samples to the Redevelopment Design Review Committee for review, in compliance with the procedural requirements of Chapter 15.46 of the Municipal Code, Community Improvement Districts and Development Projects Review. The existing design review process would ensure that future development under this alternative would not visually degrade the project site or surrounding area or cause substantial light and glare. While not a significant impact, development based on the existing zoning would likely not produce the visual character within the FTC Specific Plan's area envisioned to be accomplished through implementation of the FTC Specific Plan form-based regulating code. The aesthetic and light and glare impacts from this alternative would be less than significant, consistent with the proposed project.

Air Quality

Because the amount of development under this alternative would be increased compared to the proposed project, long-term operational local and regional air quality emissions would increase and would be significant and unavoidable, consistent with the proposed project. It is expected that the short-term construction emissions would be similar to the proposed project, as the extent of construction activities assumed for the proposed project (disturbance area, types of equipment, need for excavation, etc.) would be similar.

Local short-term (construction) emissions of PM10 and PM2.5 were determined to be significant and unavoidable with the proposed project even after implementation of SCs and MMs. While the specific projects that would be developed under this alternative are not defined, they could include substantial excavation activities within 250 feet of sensitive receptors, thus resulting in a significant and unavoidable short-term impact for local emissions of PM10 and PM2.5, as with the proposed project.

Regional long-term (operational) and cumulative emissions of criteria air pollutants for the proposed project were determined to be less than significant with implementation of Phase 1 and significant and unavoidable with buildout of the FTC Specific Plan for VOC (due to emissions of consumer products and mobile sources) and NOX and PM10 emissions (from area and mobile sources). Because this alternative would involve increased development compared to buildout of the proposed project and an associated increase in traffic (approximately 20,100 average daily trips [ADT] compared to 9,342 ADT with the proposed project), the operational emissions would also increase. In addition to the significant unavoidable operational impacts resulting from the proposed project, this alternative would result in a significant unavoidable impact related to regional long-term CO emissions, and potentially PM2.5.

As with the proposed project, there would be no potential for a local CO hotspot. Additionally, this alternative would have similar impacts related to exposure to short-term construction-related and long-term operational toxic air contaminants (TACs) as the proposed project. Construction-related TAC emissions would be short-term and less than significant. Emissions during operation from on-site sources, including the Fullerton Fire Station, diesel trucks, and restaurants, and from off-site emissions from diesel trucks and railroad engines would not be of a magnitude to expose persons to substantial TAC concentrations. Implementation of MM 2-2 which requires completion of a Health Risk Assessment (HRA) would assure that exposure to TAC emissions from the White Bear Cleaners (dry cleaning facility) to future nearby residents would be less than significant, as with the proposed project.

As with the proposed project, this alternative would not conflict with or obstruct implementation of the Air Quality Management Plan (AQMP), as the SCAQMD and SCAG use existing General Plan/zoning information to forecast, inventory, and allocate regional emissions from land use

and development-related sources. The trip generation from this alternative has been assumed in regional planning.

Cultural Resources

Development under this alternative which would have similar construction activities would have the same potential impacts to archaeological and paleontological resources during ground-disturbing activities as the proposed project. As with the proposed project, these impacts could be mitigated to a level considered less than significant.

Similar to the proposed project, development under this alternative could occur adjacent to existing historic resources identified in Section 4.3, Cultural Resources, and has the potential to cause direct impacts to historic resources due to vibration and construction and indirect impacts related to the historic setting and design compatibility. As with the proposed project these impacts would be reduced to levels considered less than significant through implementation of the identified mitigation measures and required design review. However, the FTC Specific Plan includes provisions for the protection of historic properties; existing historic resources would not be removed. Existing zoning requirements allow historic resources to be demolished with the approval of the Fullerton Landmarks Commission. Potential removal of these resources to accommodate development under this alternative would result in potentially significant and unavoidable impacts to historic resources that would not occur with the proposed project.

Geology and Soils

Similar to the proposed project, this alternative would require grading and earth movement throughout the project area. Based on the geotechnical evaluation completed for the proposed project, as described in Section 4.4 (Geology and Soils), there are no major geologic or seismic hazards within the proposed development area. Geologic and seismic considerations (such as the potential for ground shaking, liquefaction, and subsidence, etc.) have been evaluated and determined to be manageable relative to proposed development with implementation of all geotechnical recommendations, which encompass Building Code standards. Given that the development area with the proposed project and this alternative are generally the same, and the mix of land use types anticipated under each development scenario are not substantially different from a geotechnical and seismic safety standpoint, it is likely that development of the site under this alternative would have impacts similar to those associated with the proposed project. As with the proposed project, these impacts can be reduced to a level considered less than significant with implementation of the identified SCs and MMs.

Hazards and Hazardous Materials

Under this alternative existing structures would be demolished, and other development activities would involve grading and excavation, similar to the proposed project. Therefore, potential impacts related to the exposure of construction workers to ACMs, LBPs and/or PCBs, which would occur with the development under the proposed project, would also occur with this alternative. Similarly, this alternative could expose construction workers and future site occupants to potential hazards from soil and/or groundwater contamination. As with the proposed project, these impacts can be reduced to a level considered less than significant with implementation of the identified SCs and MMs.

Hydrology and Water Quality

Under this alternative a comprehensive program to manage stormwater runoff, as presented with the FTC Specific Plan for the proposed project, would not be implemented. It is assumed

that individual projects would implement required drainage and water quality protection features in compliance with applicable regulations, including requirements of the Regional Water Quality Control Board. However, the overall benefit of the FTC Specific Plan as a unified planning program, which considers land uses and associated drainage infrastructure throughout the project area and results in reduced total runoff and decreased demand on the existing storm drain system would not be realized. Because the majority of the project area is currently developed and has impervious surface, this alternative is not anticipated to increase the amount or rate of stormwater runoff and, similar to the proposed project, would not impact existing drainage facilities. However, new storm drain infrastructure would be installed with individual development project and the construction activities would result in the same construction-related impacts (air quality, noise, etc.) as identified for the proposed project.

Because each project that may be developed under this alternative would be required, at a minimum, to meet regulatory requirements, there would be a less than significant impact to hydrology and water quality during construction and operation, consistent with the proposed project. This alternative would also result in the same potential impacts to development or redevelopment projects within the northeastern portion of the project site within the 100-year flood plain, which could be reduced to a less than significant impact either through construction above the floodplain or by removing the project site from the floodplain through elevation of the project site through the placement of fill, as discussed in Section 4.6, Hydrology and Water Quality.

Land Use and Planning

Under this alternative, the project area would be developed pursuant to existing zoning designations. Implementation of this alternative would increase the overall density of development within the project area compared to both existing conditions and the proposed project. A General Plan Amendment or zone change would not be needed and this alternative would not conflict with the goals and policies outlined in the City's General Plan. Although this alternative would include some residential development, it would not achieve goals of the relevant plans and programs of the City or SCAG regarding the redevelopment and revitalization of the downtown area and the encouragement of mixed use developments to the same extent as the proposed project, which would result in substantially more residential development (refer to planning programs discussed in Section 4.7, Land Use and Planning). This alternative would result primarily in the development of non-residential uses and does not provide for the same mix of uses within the project area as the proposed project. As with the proposed project, this alternative would not result in any significant land use impacts.

Noise

Short-term construction-related noise impacts resulting from this alternative would be similar to the proposed project as construction activities, including the number and type of equipment, would be similar. As with the proposed project, construction activities would be conducted in compliance with the City's Noise Ordinance. Also similar to the proposed project, there is a potential for significant unavoidable noise impacts during construction due to substantial increases in noise levels compared to ambient conditions in vicinity of sensitive receptors.

Proposed uses under this alternative would be subject to noise from the same sources as the proposed project (traffic, railroad, stationary sources, fire station, HVAC units, and truck deliveries). Although the noise standards included in the FTC Specific Plan would not be applied under this alternative, compliance with the existing Noise Ordinance and mitigation measures similar to those identified in Section 4.8, Noise and Vibration, would be required to ensure that potential impacts are less than significant. Additionally, future residential development within the

project area would be required to meet the 45 dBA CNEL interior noise level standards established by Title 24 of the California Code of Regulations. As with the proposed project, noise impacts to land uses that may be developed under this alternative would be less than significant.

Land uses that would be developed under this alternative would have the potential to generate project-related traffic noise impacts to uses outside of project area. This alternative would generate more traffic compared to the proposed project, thereby increasing noise levels along roadways with sensitive receptors. However, similar to the proposed project, this alternative would not generate enough traffic to cause a traffic-related noise impact. Additionally, this alternative would generate noise from stationary sources similar to the proposed project (restaurant and entertainment establishments, HVAC units, and truck deliveries). As with the proposed project, noise levels on local roadways would mask the noise from these onsite activities. These impacts would be less than significant similar to the proposed project.

Vibration impacts during construction and operation for land uses under this alternative would be similar to the proposed project, because of similar construction activities and proximity to vibration-generating uses (such as the railroad). Vibration impacts would be less than significant with implementation of identified mitigation measures.

Population, Housing, and Employment

Implementation of this alternative would result in the development of approximately 292 new residential units (compared to a maximum of 1,560 with the proposed project under the High Residential/Low Office development scenario). Using the population generation factor of 2.929 persons per dwelling unit, this alternative would generate approximately 855 people (compared to 4,569 with the proposed project). This alternative would generate approximately 1,198 net new employment opportunities related to the allowed commercial, manufacturing and public land uses. This is substantially greater than the proposed project which would have a net increase of 113 jobs. Development under this alternative would be consistent with the existing zoning for the project area and would not be expected to exceed the amount and rate of growth anticipated by the City. Therefore, the significant unavoidable impact related to housing and population growth that would occur with the proposed project would be avoided with this alternative.

Public Services and Recreation

This alternative would create new demands for public services (police protection, fire protection, schools, libraries, and parks/recreation), from residential and non-residential uses, but these demands would be less than for the proposed project because there would be a substantial reduction in the amount of residential development, which generates the greatest demand for public services. It should be noted that potential impacts from the proposed project were determined to be less than significant with incorporation of the mitigation program, and potential public service impacts resulting from this alternative would also be less than significant.

Transportation and Traffic

The proposed project would generate short-term construction and long-term operational traffic. Because the amount and type of construction activities would be similar to the proposed project, the short-term construction-related traffic impacts resulting from the proposed project would also occur with this alternative. These impacts would be less than significant with the proposed project and this alternative.

Under this alternative, and assuming the same transit-oriented development (TOD) trip reduction taken for the proposed project (refer to discussion provided in Section 4.11, Transportation and Traffic), this alternative would generate approximately 20,100 new average daily trips (ADTs) compared to approximately 9,342 with implementation of the proposed project. The significant impacts at the intersections of Harbor Boulevard and Chapman Avenue (Year 2035) in the City of Fullerton and Lemon Street and Orangethorpe Avenue (Years 2015, 2020 and 2035) in the cities of Fullerton and Anaheim resulting with implementation of the proposed project would also occur with this alternative. As with the proposed project, the impact at Harbor Boulevard and Chapman Avenue could be mitigated to a level considered less than significant with implementation of the identified mitigation measures. The impact at Lemon Street and Orangethorpe Avenue could also be mitigated with physical improvements; however, the City of Fullerton cannot guarantee that mitigation in another jurisdiction (City of Anaheim) will be implemented. Therefore, this impact would be significant and unavoidable for the proposed project and this alternative.

Due to the substantial increase in traffic volumes with this alternative compared to the proposed project, it is expected that additional arterial roadway segments would operate at a poor level of service (LOS) and significant impacts would occur at other study area intersections, potentially including intersections outside of the City of Fullerton. While this alternative does not include the installation of signals and other roadway improvements included as part of the proposed project, it is anticipated that these improvements would be installed with future development as part of individual projects, or as required by mitigation measures. However, there is a potential that significant unavoidable impacts would occur at other study area intersections under this alternative that do not occur with the proposed project, due to the substantial increase in traffic.

As with the proposed project, this alternative would not generate peak hour traffic along freeway mainline segments within the study area that would result in significant impacts. Additionally, this alternative would result in less than significant impacts related to CMP intersections within the traffic study area (as identified in Section 4.11, Transportation and Traffic). Although there is an increase in traffic volumes, it is not expected that CMP intersections would operate at LOS E or worse, and even if this should occur, the change in volume to capacity (V/C) ratios at these intersection resulting from this alternative is anticipated to be less than 0.03. The impact to freeway mainline segments and CMP intersections would be less than significant for the proposed project and this alternative.

Similar to the proposed project, this alternative would have less than significant impacts related to emergency access. Although this alternative would not include the improvements to bicycle and pedestrian facilities proposed with the FTC Specific Plan, it would not conflict with adopted policies, plans, or programs regarding public transit, bicycle or pedestrian facilities, or otherwise decrease the performance or safety of such facilities. As with the proposed project, this impact would be less than significant.

Parking under this alternative would be implemented in compliance with existing requirements of the City's Zoning Code. As with the proposed project, impacts would be less than significant.

Utilities and Service Systems

This alternative would create new demands on local utility providers. Due to the increased intensity of development under this alternative compared to the proposed project the amount of wastewater and solid waste generation, and consumption of water and energy is expected to be greater than the proposed project. Consistent with the proposed project, this alternative would require that new infrastructure be installed to serve the proposed development; however, there are utilities within or adjacent to the project area to serve this alternative. While the proposed

project would not require installation of any significant new utility infrastructure outside of the FTC Specific Plan area (the exception is the new sewer lines in Santa Fe Avenue/Highland Avenue that were recently constructed by the City; and water line connections to Truslow Avenue, in South Balcom and South Lawrence Avenues), due to the increased intensity of development, this alternative could require off-site utility infrastructure upgrades. The physical environmental impacts from installation of new utilities addressed for the proposed project (disturbance within existing street right-of-way and associated air quality, noise, and traffic impacts) would also occur under this alternative. As with the proposed project, developers would be required to pay fair share costs for utility upgrades where the alternative contributes to an already deficient line. Potential impacts from the proposed project were determined to be less than significant with incorporation of the mitigation program, and potential utility impacts resulting from this alternative would also be reduced to less than significant levels.

Under this alternative, the FTC Specific Plan requirement for a net zero impact on the City's existing water supply sources would not apply; therefore, this alternative would consume more water than the proposed project. However, it is expected that there would be sufficient water supply, similar to the proposed project.

Greenhouse Gas Emissions

As with development under the proposed project, this alternative would generate greenhouse gas emissions during construction and operation. Because this alternative would generate approximately 20,100 ADT compared to approximately 9,342 with implementation of the proposed project, there would be a proportional increase in vehicle miles traveled; therefore, the total amount of greenhouse gas emissions would be increased to approximately 40,000 metric tons of carbon dioxide equivalent (MTCO₂e)/year. Additionally, the total service population under this alternative would be 2,053 (employees and residents) which is less than half of the proposed project (4,544). With the increase in emissions and reduced service population, this alternative would have a GHG efficiency greater than 19 MTCO₂e/service population (SP)/year (residents plus employees), substantially exceeding the established significance threshold of 4.6 MTCO₂e/SP/year. This alternative would result in a significant unavoidable impact related to greenhouse gas emissions that would not result with the proposed project, which would have a less than significant impact for this issue.

Conclusions

Ability to Avoid or Substantially Lessen the Significant Impacts of the Project

Development within the FTC Specific Plan project area under the No Project/Development Pursuant to Existing Zoning would substantially increase development intensity compared to the proposed project, and would primarily involve non-residential uses. This alternative would not avoid significant unavoidable impacts resulting from the proposed project related to air quality, noise, and traffic); however, it would avoid the significant and unavoidable project impact related to population and housing. This alternative would result in additional potentially significant and unavoidable impacts related to regional long-term (operational) emissions of CO and potentially PM2.5, removal of historic resources, noise, employment, traffic and greenhouse gas emissions. Although the development intensity would be greater, this alternative would result in less than significant impacts for the remaining topical issues, similar to the impact conclusion for the proposed project.

Attainment of Project Objectives

In addition to having more significant environmental impacts than the proposed project, this alternative would not meet the project goals and objectives identified in Section 5.2, or would not meet them to the same extent as the proposed project.

While this alternative would involve new development, it would not create buildings, public spaces, streets, and infrastructure that contribute to a sustainable built environment. Under existing zoning there is no commitment to LEED development and no requirement for civic spaces, protection of historic resources, or creation of a pedestrian friendly environment. While the development under existing zoning would involve various land uses, it would not provide sufficient residential development/customer base to contribute toward a sustainable Downtown economy to the same extent as the proposed project. This alternative would create a mixed-use and transit-oriented neighborhood, but it would not contribute to a sustainable natural environment to the same extent as the project since it would not improve non-vehicular modes of transportation and access to these facilities, reduce per capita VMT and associated greenhouse gas emissions, or require a net zero impact on the City's water supply sources. Additionally, with only 292 residential units, this alternative would not assist the City in meeting regional affordable housing allocations to the same extent as the proposed project, and would not provide the same level of sustainable community lifestyle as the proposed project.

5.4.3 REDUCED DENSITY/REDUCED DEVELOPMENT AREA (PHASE 1 ONLY)

Description of the Alternative

The primary purpose of the Reduced Density/Reduced Development Area alternative is to reduce the total amount of development and development area compared to the proposed project to reduce operational impacts (e.g., air quality, population/housing, noise, traffic, etc.) resulting from the proposed project. Although the development area would also be reduced, the construction activities for individual projects under the FTC Specific Plan would be similar in scope (including disturbance area, equipment, etc.). Therefore, construction-related impacts are generally the same for this alternative and the proposed project. However, it should be noted that the amount and duration of construction necessary for buildout of this alternative would be reduced compared to the proposed project.

The Reduced Density/Reduced Development Area alternative has been defined as implementation of Phase 1 of the proposed FTC Specific Plan project only; Phase 2 would not be implemented and existing uses would remain in operation. The maximum allowed development, for both the High Office/Low Residential and High Residential/Low Office scenarios, under this alternative is summarized in Table 5-2. Exhibits 3.3-4a through 3.3-4c in Section 3, Project Description, show a graphic depiction of the Phase 1 land use concept.

TABLE 5-2 MAXIMUM ALLOWED DEVELOPMENT REDUCED DENSITY/REDUCED DEVELOPMENT AREA (PHASE 1) ALTERNATIVE

	General Retail/ Restaurant (square feet)	Office (square feet)	Hotel (rooms)	Residential- Live/Work Units ^a (units)	Public (square feet)
High Office/Low Residential Scenario (Phase 1 Only)					
Total Development	65,000	75,000	0	453	0
High Residential/Low Office Scenario (Phase 1 Only)					
Total Development	65,000	24,000	0	500	0
^a Includes required affordable housing units and additional units that may be constructed per California Density Bonus Law.					

The Reduced Density/Reduced Development Area alternative would reduce proposed new development by 35,000 sf of general retail/restaurant, 25,000 sf of office, a 120-room hotel, and 1,060 residential units, regardless of the scenario implemented. This would represent an approximate 25 percent reduction in general retail/restaurant, 23 percent to 44 percent reduction in office depending on the development scenario, 100 percent reduction in hotel, and 62 percent to 64 percent reduction in residential units when compared to the maximum buildout of the proposed project. With the exception of the Fullerton Train Depot (a public use, as identified in Table 5-1), no existing uses within the Phase 1 development area would be removed or relocated.

Consistent with the proposed project, this alternative would involve a General Plan amendment to change the land use designation for the Phase 1 development area to "Fullerton Transportation Center Specific Plan" and zone change to "Specific Plan District". Development under this alternative would be implemented in compliance with the relevant provisions of the FTC Specific Plan. Phase 2 of the FTC Specific Plan project, including the proposed hotel, would not be implemented and existing development in the Phase 2 area would remain operational.

Comparative Analysis of Environmental Impacts

Aesthetics

This alternative would result in the same short-term views of construction activity and long-term visual changes as the proposed project solely within the Phase 1 area, as the same scope of development and design standards would be implemented. Consistent with the impact determination for the proposed project, short-term visual changes associated with construction activities would be less than significant. The FTC Specific Plan Regulating Code and design standards (refer to PDFs 1-1 through 1-6) are intended to ensure that proposed development would not visually degrade the FTC Specific Plan project area or surrounding area or cause substantial light and glare. As with the proposed project, the proposed redevelopment of the Phase 1 area would be considered an improvement to the existing visual quality of the project area. As with the proposed project, this alternative would also result in less than significant impacts related to visual quality and light and glare.

Air Quality

This alternative would result in similar short-term construction-related and reduced long-term operational local and regional emissions compared to the proposed project. As discussed in

Section 4.2, Air Quality, because Phase 1 construction activities would be more intensive than Phase 2, Phase 1 was used as the basis of estimating maximum daily construction emissions of criteria pollutants. As shown in Table 4.2-5 in Section 4.2, for both scenarios analyzed, mass emissions of all criteria pollutants during construction of Phase 1 land uses would be less than the applicable thresholds. Regional project and cumulative construction emissions for this alternative would be less than significant, consistent with the proposed project.

Even with implementation of identified SCs and MMs related to dust control and architectural coatings, local short-term (construction) emissions of PM10 and PM2.5 were determined to be significant and unavoidable when conducting excavation activities (such as for subterranean parking) within approximately 250 feet of sensitive receptors after implementation of SCs and MMs. Because the anticipated construction activities for this alternative would be the same as the proposed project, including potential construction within 250 feet of sensitive receptors, this alternative would also result in a significant and unavoidable short-term impact for local emissions of PM10 and PM2.5.

Regional long-term (operational) emissions of criteria air pollutants for the proposed project were determined to be less than significant with implementation of Phase 1; however, significant and unavoidable emissions of VOC, NOx, and PM10 were identified with implementation of Phase 2 (project and cumulative impact) because Phase 2 would have substantially more residents using consumer products, and more vehicle trips than Phase 1. Therefore, this alternative which involves only development of Phase 1 would result in less than significant long-term regional emissions, and would avoid the significant and unavoidable impacts of the proposed project.

This alternative would not expose persons to substantial CO concentrations or TAC emissions from operations; however, similar to the proposed project residential uses could be developed within 300 feet of the White Bear Cleaners (dry cleaning facility) potential exposing residents to TACs. With implementation the identified mitigation (MM 2-2) this alternative would have a less than significant impact, consistent with the proposed project.

As with the proposed project, this alternative would not conflict with or obstruct implementation of the Air Quality Management Plan (AQMP), as the SCAQMD and SCAG used existing General Plan/zoning designations to forecast, inventory, and allocate regional emissions from land use and development-related sources. The trip generation from this alternative would be substantially less than anticipated by existing planning documents.

Cultural Resources

As identified in PDF 3-1 in Section 4.3, Cultural Resources, the FTC Specific Plan requires that historic structures be preserved/reused (not demolished); this alternative would preserve the only identified historical structure within the Phase 1 area, the Fullerton Train Depot. This alternative would not protect other historic resources within the FTC Specific Plan area which would be preserved with the proposed project (refer to Exhibit 3.3-2). While these buildings would not be preserved, this alternative would not result in their removal.

Additionally, development under this alternative could occur adjacent to existing historic resources as identified in Section 4.3, Cultural Resources, and has the potential to cause direct impacts due to vibration and construction and indirect impacts related to setting and design compatibility similar to the proposed project. As with the proposed project these impacts would be reduced to levels considered less than significant through implementation of the identified mitigation measures (MM 3-1 and 3-2) and required design review (PDF 3-2). Therefore, like the proposed project, there would be less than significant impacts to historical resources.

Development under this alternative would have the same potential impacts to archaeological and paleontological resources during ground-disturbing activities, limited to the Phase 1 area, as with the proposed project. The potential impacts to archaeological and paleontological resources would also be mitigated to a level considered less than significant with implementation of MMs 3-5 and 3-6, consistent with the proposed project.

Geology and Soils

Similar to the proposed project, this alternative would require grading and earth movement throughout the Phase 1 development area. Based on the geotechnical evaluation completed for the proposed project, as described in Section 4.4 (Geology and Soils), there are no identified major geologic or seismic hazards. Geologic and seismic considerations (such as the potential for ground shaking, liquefaction, and subsidence, etc.) have been evaluated and determined to be manageable relative to proposed development with implementation of all geotechnical recommendations, which encompass Building Code standards. Given that the development area and proposed development with Phase I of the proposed project and this alternative are the same, development under this alternative would have the same impacts as those associated with the proposed project. These impacts would be reduced to levels considered less than significant within implementation of identified SC 4-1, and MMs 4-1 and 4-2, consistent with the proposed project.

Hazards and Hazardous Materials

Under this alternative existing structures would be demolished, and other development activities would involve grading and excavation, similar to the proposed project. Therefore, potential impacts related to the exposure of construction workers to ACMs, LBPs and/or PCBs, which would occur with the development under the proposed project, would also occur with this alternative. Similarly, this alternative could expose construction workers and future site occupants to potential hazards from soil and/or groundwater contamination. These impacts would be reduced to levels considered less than significant with implementation of identified SCs 5-1 and 5-2 and MMs 5-1 through 5-5, consistent with the proposed project.

Hydrology and Water Quality

This alternative would implement the same program to manage stormwater runoff within the Phase 1 development area as the proposed project as outlined in the FTC Specific Plan Regulating Code (and described in PDFs 6-1 through 6-7). Similar to the proposed project, within the Phase 1 development area this alternative would result in decreased impervious area, reduced total runoff and decreased demand on the existing storm drain system through implementation of enhanced landscaping, civic spaces, BMPs related to LID practices, and compliance with applicable water quality regulations (as outlined in SCs 6-1 and 6-2). As with the proposed project, impacts from this alternative related to storm drainage and water quality would be less than significant. As shown on Exhibit 4.6-4, the Phase 1 development area is not within the 100-year flood plain. This alternative would have less than significant impacts to hydrology, water quality and flooding with implementation of PDFs, SCs and MMs, similar to the proposed project.

Land Use and Planning

As described above, this alternative would involve a General Plan amendment, Zone Change and implementation the FTC Specific Plan, including the provisions of the Regulating Code (refer to PDFs 7-1, 7-2, 7-3, 7-5 and 7-6), for the Phase 1 development area only. The provisions of the Specific Plan described in these PDFs address the type of development

allowed as well as compatibility between residential and non-residential land uses, and would ensure that land use impacts are less than significant, consistent with the proposed project.

This alternative would achieve the goals of the relevant plans and programs of the City or SCAG regarding the redevelopment and revitalization of the downtown area and the encouragement of mixed use developments similar to the proposed project (refer to planning programs discussed in Section 4.7, Land Use and Planning) but not to the level anticipated at buildout as with the proposed project because it does not encompass the entire area around the Fullerton Transportation Center that has been planned for redevelopment. However, as with the proposed project, this alternative would be consistent with the relevant goals and policies of applicable local and regional planning programs and would result in a less than significant impact.

Noise

Short-term construction-related noise impacts resulting from this alternative would be similar to the proposed project as construction activities, including the number and types of equipment, would be similar. As with the proposed project, construction activities would be conducted in compliance with the City's Noise Ordinance; however, there is a potential for significant unavoidable noise impacts during construction when construction activities are within 80 feet of sensitive receptors. Even with implementation of MMs 8-1 and 8-2 this impact would be significant and unavoidable for the proposed project and this alternative.

Proposed uses under this alternative would be subjected to noise from the same sources as the proposed project (traffic, railroad, stationary sources, fire station, HVAC units, and truck deliveries). As with the proposed project, compliance with the noise requirements outlined in the FTC Specific Plan (PDFs 8-1 through 8-3) and applicable provisions of the City's Noise Ordinance (SC 8-2 which requires that interior noise standards for residential properties be met), and implementation of MMs 8-3 through 8-6 identified in Section 4.8, Noise and Vibration, would ensure that potential impacts are less than significant.

Land uses that would be developed under this alternative would have the potential to generate traffic noise impacts to uses outside of project area. This alternative would generate less traffic compared to the proposed project (buildout of the FTC Specific Plan) and would have reduced project-generated traffic noise levels. As with the proposed project, this alternative would not generate enough traffic to cause a traffic-related noise impact. Additionally, this alternative would generate noise from stationary sources similar to the proposed project (restaurant and entertainment establishments, HVAC units, and truck deliveries). As with the proposed project, noise levels on local roadways would mask the noise from on-site activities. These impacts would be less than significant, similar to the proposed project.

Vibration impacts during construction and operation for land uses under this alternative would be similar to the proposed project, due to the similar nature of construction activities, and exposure of residents to the same vibration-generating uses. Construction impacts would be less than significant and potential impacts to buildings due to vibration from the railroad tracks would be less than significant for this alternative and the proposed project with implementation of MM 8-7.

Population, Housing, and Employment

With the maximum development of the High Residential/Low Office development scenario for this alternative, implementation of this alternative would involve the development of up to 500 residential units and would generate approximately 1,465 new residents in the City of

Fullerton compared to 4,569 with the proposed project under the same scenario². Although there would be a substantial reduction in the amount of housing and associated population growth generated under this alternative when compared to the proposed project, it would still exceed the amount and rate of growth anticipated by the City based on the existing General Plan land use designations and zoning for the project area. Therefore, the significant unavoidable impact resulting from the proposed project would also occur with this alternative.

Because of the reduction in housing compared to the proposed project, the City's goals and objectives to provide diversified housing of all types and tenures (type and price), as set forth in its recently adopted 2006-2014 Housing Element certified by HCD, would be hindered. To meet the City's Regional Housing Needs Assessment (RHNA) obligations, the Housing Element identifies numerous parcels within the FTC Specific Plan area as target sites for rezoning to accommodate new residential development through infill redevelopment. The rezoning would be to densities that cover very low- and low-income RHNA allocations.

Under the High Office/Low Residential scenario for this alternative there would be up to 299 net new employees (375 new jobs and 76 jobs eliminated with removal of existing structures), compared to a net increase of 113 jobs with the proposed project³. As with the proposed project, the indirect growth from this alternative resulting from additional employment opportunities would not result in a significant impact.

Public Services and Recreation

This alternative would create new demands for public services (police protection, fire protection, schools, libraries, and parks/recreation), from residential and non-residential uses but these demands would be less than for the proposed project because there would be a substantial reduction in the amount of residential development which generates the greatest demand for public services. This alternative would not require relocation of the existing Fire Station No. 1. Consistent with the FTC Specific Plan, civic spaces would be implemented under this alternative (PDF 10-2) including the Transit Plaza and Transit Courtyard, and common open space would be provided for residents (PDF 10-3). Potential impacts to public services from the proposed project were determined to be less than significant with incorporation of PDFs and SCs (regarding fire protection and payment of school and park fees). Potential public service impacts resulting from this alternative would also be less than significant, consistent with the proposed project.

Transportation and Traffic

The proposed project would generate short-term construction and long-term operational traffic. Because the amount and type of construction activities would be similar to the proposed project, the short-term construction-related traffic impacts resulting from the proposed project would also occur with this alternative. With implementation of SCs 11-2 and 11-3 and MM 11-4 which address construction traffic, these impacts would be less than significant with the proposed project and this alternative.

As identified in Table 4.11-6 in Section 4.11, Transportation and Traffic, this alternative (Phase 1 of the proposed FTC Specific Plan) would generate 4,733 daily trips (ADT), 263 AM peak hour trips, and 506 PM peak hour trips, compared to 9,342 ADT, 468 AM peak hour and 857 PM peak hour trips with the proposed project (buildout of the FTC Specific Plan). This trip

Under the High Office/Low Residential scenario for this alternative there would an increase in population of 1,327 people.

³ Under the High Residential/Low Office scenario for this alternative there would a net increase of 146 employees.

generation takes into account the same TOD trip reduction and internal trip capture assumptions as the proposed project. Additionally, this alternative would include implementation of the roadway and intersection improvements identified for the proposed project (PDF 11-1). As identified in the analysis presented in Section 4.11, Transportation and Traffic, this alternative would result in a significant impact at the intersection of Lemon Street and Orangethorpe Avenue in the City of Anaheim (using the City of Anaheim ICU methodology for traffic analysis). As with the proposed project, this impact could be mitigated to a less than significant level with physical improvements (refer to MM 11-1). However, the City of Fullerton cannot guarantee that mitigation in another jurisdiction will be implemented; therefore, this impact would be considered significant and unavoidable impact. This alternative would avoid the impact at Harbor Boulevard and Chapman Avenue which occurs in the Year 2035 with buildout of FTC Specific Plan. However, this impact is mitigated to a less than significant level with the proposed project.

As with the proposed project, this alternative would not generate substantial peak hour traffic along freeway mainline segments within the study area and potential impacts would be less than significant. Additionally, this alternative and the proposed project would result in less than significant impacts at CMP intersections.

Similar to the proposed project this alternative would have less than significant impacts related to emergency access. Additionally, this alternative would include implementation of pedestrian and bicycle facility improvements proposed with the FTC Specific Plan for the Phase 1 development area (PDF 11-2); however, the comprehensive plan for these facilities throughout the FTC Specific Plan area would not be implemented. Additionally, relocation of the OCTA Bus Depot would occur with this project (PDF 11-3) to improve access between bus and transit facilities. This alternative and the proposed project would not conflict with adopted policies, plans, or programs regarding public transit, bicycle or pedestrian facilities, or otherwise decrease the performance or safety of such facilities resulting in a less than significant impact.

Parking under this alternative would be constructed in compliance with the requirements of the FTC Specific Plan. As with the proposed project, impacts would be less than significant.

Utilities and Service Systems

This alternative would create new demands on local utility providers. Due to the reduced amount development under this alternative, compared to the proposed project, the amount of wastewater and solid waste generation, and consumption of water and energy would be reduced. Consistent with the proposed project, this alternative would require that new infrastructure be installed to serve the proposed development (PDFs 12-1, 12-2 and 12-4); however, there are utilities within or adjacent to the project area to serve this alternative. The physical environmental impacts from installation of new utilities addressed for the proposed project (disturbance within existing street right-of-way and associated air quality, noise, and traffic impacts) would also occur under this alternative. This alternative would not require installation of new utility infrastructure outside of the FTC Specific Plan area (with the exception of the recently installed new sewer lines in Santa Fe Avenue and Highland Avenue), whereas the proposed project does require minor extensions of water lines to Truslow Avenue, on both S. Balcom and S. Lawrence Avenues. As with the proposed project, developers would be required to pay fair share costs for the sewer line upgrade recently completed by the City (MM 12-1). Potential impacts from the proposed project were determined to be less than significant with incorporation of the mitigation program, and potential utility impacts resulting from this alternative would also be reduced to less than significant levels.

Based on the reduced land use intensity, this alternative would consume less water than the proposed project (88 acre feet per year [AFY] compared to 263.3 AFY). However, as with the

proposed project, development under this alternative would be required to have a net zero impact on the City's existing water supply sources (PDF 12-3); therefore, the actual amount of water consumed on a city-wide basis would be similar. Even without the requirement for the project (and this alternative) to have a net zero impact on the City's water supply sources, there would be sufficient water supply for the proposed project (FTC Specific Plan buildout) and this alternative (development of Phase 1 only).

Greenhouse Gas Emissions

As with development under the proposed project, this alternative would generate greenhouse gas emissions during construction and operation. This analysis assumes that all measures applied to the proposed project to reduce greenhouse gas emission would be applicable to development under this alternative (within the Phase 1 development area).

Assuming the High Office/Low Residential development scenario for this alternative, GHG emissions would be approximately 9,762 MTCO2e per year, compared to 22,561 MTCO2e with the proposed project. The reduction in emissions is associated with the reduced amount of development and associated ADT and vehicle miles traveled. The total service population under this alternative would be 1,626 (employees and residents) compared to 4,544 for the proposed project. This results in a ratio of total GHG emissions to service population of 6.0 MTCO2e, which would exceed the established significance threshold of 4.6 MTCO2e/service population/year (residents plus employees). Because the reduction in service population is greater than the reduction in GHG emissions compared to the proposed project, this alternative would not achieve the compact development density of the proposed project and GHG efficiency ratio is increased. This alternative under both development scenarios would result in a significant unavoidable impact related to GHG emissions; the proposed project would have a less than significant impact for this issue.

Conclusions

Ability to Avoid or Substantially Lessen the Significant Impacts of the Project

As identified above, due to the reduced density, the Reduced Density/Reduced Development Area Alternative (Phase 1 of the FTC Specific Plan only) would have similar or reduced impacts compared to the proposed project for each topical issue with the exception of GHG emissions. Although the development area would also be reduced, the construction activities for individual projects under the FTC Specific Plan would be similar in scope (including disturbance area, equipment, etc.). Therefore, construction-related impacts are generally the same for this alternative and the proposed project.

Although the amount of development would be reduced, the following significant and unavoidable impacts that result from the proposed project (buildout of the FTC Specific Plan) would occur with this alternative (development of Phase 1 only):

 Air Quality: local exposure to short-term, construction-related emissions of PM10 and PM 2.5 exceeding ambient air quality standards, and exposure of sensitive receptors to PM10 and PM2.5 emissions that exceed the 24-hour ambient air quality standard during the mass grading and excavation phase.

Under the High Residential/Low Office scenario GHG emissions would be 9,515 MTCO2e per year, the service population would be 1,611, and the ratio of total GHG emissions to service population would be 5.91 MTCO2e per year.

- Noise: short-term construction noise levels within 80 feet of sensitive receptors could be substantially greater than existing ambient noise levels.
- Population, Housing and Employment: substantial increase in population and housing growth beyond projections for the project area resulting in project and cumulative impacts.
- Transportation and Traffic: implementation of this alternative would significantly impact
 the intersection of Orangethorpe Avenue and Lemon Street using the City of Anaheim
 intersection capacity utilization (ICU) methodology for analyzing impacts. The
 Orangethorpe Avenue and Lemon Street intersection is also under the jurisdiction of the
 City of Anaheim.

Additionally, this alternative would result in significant and unavoidable impacts from GHG emissions that would not occur with the proposed project. This alternative would avoid regional long-term project-related and cumulative emissions of VOC, PM10, and NOx which would occur with implementation of the proposed project.

Attainment of Project Objectives

As discussed previously, development of Reduced Density/Reduced Development Area alternative would result in an approximate 25 percent reduction in general retail/restaurant, 23 percent to 44 percent reduction in office (depending on the development scenario assumed), 100 percent reduction in hotel, and 62 percent to 64 percent reduction in residential units when compared to the maximum buildout of the FTC Specific Plan. Although this alternative would have similar or reduced impacts compared to the proposed project, it would not meet the following project goals and objectives to the same extent, primarily because of the reduced development area, resulting in much of the FTC Specific Plan area remaining in its current condition.

Goal 1: Create buildings, public spaces, streets, and infrastructure that contribute to a sustainable built environment.

Objective 1C: Maintain the character and important features of designated Historic Buildings.

Objective 1D: Create buildings with an active and positive ground-floor presence along streets and civic spaces.

Objective 1E: Design contemporary and highly-articulated buildings that create a positive image for the Downtown.

Objective 1F: Improve and expand the existing circulation network to create a pedestrian-friendly environment that supports walking, bicycling and transit ridership.

This alternative would generally achieve Goal 1 to create buildings, public spaces, streets, and infrastructure that contribute to a sustainable built environment; however, design objectives would be met related to streets and civic spaces (Objective 1D), architecture (Objective 1E), and improving non vehicular circulation (Objective 1F), it would occur only within the reduced development area. Although this alternative would not result in the removal of historic structures, it would not provide the same protection to historic structures that is provided by the FTC Specific Plan, which requires preservation of all historic structures within the FTC Specific Plan project area (Objective 1C).

Goal 2: Create a mixed-use neighborhood that contributes toward a sustainable Downtown economy.

Objective 2A: Increase the customer base for downtown businesses by increasing the resident and office population near the Train Depot.

Objective 2B: Improve the economic diversity of Downtown Fullerton by creating attractive commercial space near the Fullerton Train Depot.

Objective 2C: Enhance the long-term vitality, functionality, and desirability of Downtown properties by redeveloping underutilized properties near the Fullerton Train Depot.

Objective 2D: Create development regulations that allow a variety and mix of uses based on changing market conditions.

Objective 2E: Create development regulations that allow a mix of neighborhood-serving, transit-serving, and family-oriented retail uses, including a mix of national, regional, and independent retailers.

While the development under the Reduced Density/Reduced Development Area alternative would involve various land uses, it would not contribute toward a sustainable Downtown economy (Goal 2) to the same degree as the proposed project, because of the reduced residential development/customer base. The reduction in residential units, office and retail uses and removal of the hotel reduces the benefits the proposed project obtains from the provision of mixed-uses. Additionally, the reduction in development area minimizes the ability to redevelop/revitalize the project area in Downtown Fullerton and improve the economic diversity as the parcels east of Lemon Street; and south of the railroad tracks would remain underutilized with primarily industrial-related uses (refer to Objectives 2A through 2E).

Goal 3: Create a mixed-use and transit-oriented neighborhood that contributes to a sustainable natural environment.

Objective 3A: Decrease dependency on the automobile by providing new housing, employment, shopping, dining, and recreational opportunities at the Fullerton Transportation Center.

Objective 3B: Encourage the reduction of per capita vehicle miles traveled and per capita greenhouse gas emissions (when compared to non-transit-oriented development) by increasing opportunities for walking, bicycling, and transit ridership.

Objective 3D: Include pedestrian and bike connections as key elements in the project.

This alternative would contribute to a sustainable natural environment through creation of a mixed-use and transit-oriented neighborhood (Goal 3), but not to the same extent as the proposed project due to the limited development area. Compared to the buildout of the FTC Specific Plan in its entirety, the reduction in residential development under this alternative reduces the benefits gained related to decreasing dependency on the automobile, and reducing vehicle miles traveled (Objective 3A and 3B). Additionally, while pedestrian and bicycle connections within the Phase 1 development area would be implemented under this alternative, the additional connectivity provided by the proposed project would not occur, and overall effectiveness of the existing and proposed facilities would be reduced (Objective 3D).

Goal 4: Develop and promote a framework for a sustainable community lifestyle.

Objective 4A: As part of the mixed-use environment, incorporate cultural and civic spaces, such as a Transit Plaza, neighborhood parks, paseos, and courtyards.

Objective 4B: Develop outdoor spaces and amenities that accommodate the needs of various demographics, including commuters, residents, visitors, shoppers, and families with children.

Objective 4C: Diversify the City's housing options by providing a range of housing types that are affordable to a variety of income levels and contribute to the city's Regional Housing Needs Assessment (RHNA) obligation.

Objective 4D: Increase opportunities to meet the City of Fullerton's regional affordable housing allocations by increasing densities near the Downtown and the Fullerton Transportation Center.

Objective 4E: Provide outdoor areas for residents, visitors, and commuters that promote interaction and serve as community gathering spaces.

Objective 4F: Reflect the significance of the railroad, agriculture history, and music within civic spaces and streetscapes.

Because of the reduced development area under this alternative, the goals or objective related to developing a sustainable community lifestyle would not be met to the same extent as the proposed project (Goal 4 and Objectives 4A through 4E). While the civic and open spaces within the Phase 1 development area would be implemented under this alternative (Transit Plaza, Transit Courtyard, paseos, Rail Promenade, and privately owned common open space), the neighborhood parks, numerous paseos, and streetscape improvements in the remainder of the development area would not occur, reducing the availability of outdoor spaces and amenities for public gathering and activities. Additionally, the reduction in proposed residential units (maximum of 500 units compared to 1,560 with the proposed project), would limit the ability of the City to meet its RHNA obligation (Objective 4C), and opportunities for affordable housing (Objective 4D).

It should be noted that this alternative would meet the remaining objectives related to designing buildings to meet identified LEED standards (Objective 1A and 1B), improving access between bus and rail transit (Objective 3C), utilizing low impact development techniques to improve the quality of stormwater runoff and to minimize impacts on downstream drainage systems (Objective 3E), and ensuring that new development has a net zero impact on the City's existing water supply sources (Objective 3F).

5.4.4 ALTERNATIVE SITE PLAN

Description of the Alternative

Within the FTC Specific Plan project area there are various private properties not owned by the City or the project applicant. The purpose of the "Alternative Site Plan" alternative is to identify the development potential within the FTC Specific Plan area for those parcels either currently owned by the Fullerton Redevelopment Agency (City) or the project applicant or committed to participation in the FTC Specific Plan (through coordination with current private property owners). This alternative would not require acquisition of any additional property by the City or project applicant. This also provides a feasible alternative that would result in a reduced density

and reduced development area, which would reduce the amount of construction-related impacts (primarily associated with air quality emissions) and long-term operational impacts (air quality, population/housing, noise, traffic, etc.).

Exhibit 5-1 identifies the properties that would be developed under this alternative and the types of land uses assumed for this analysis. The maximum allowed development under this alternative for both the High Office/Low Residential and High Residential/Low Office scenarios is summarized in Table 5-3.

TABLE 5-3 MAXIMUM ALLOWED DEVELOPMENT ALTERNATIVE SITE PLAN

	General Retail/ Restaurant (square feet)	Office (square feet)	Residential & Live/Work Units ^a (units)		
High Office/Low Residential Scenario					
Total Development	45,150	55,650	719		
High Residential/Low Office Scenario					
Total Development	45,150	24,000	749		
^a Includes required affordable housing units and additional units that may be constructed per California Density Bonus Law.					

Under the High Office/Low Residential scenario, this alternative would reduce proposed development by 54,850 sf of general retail/restaurant; 44,350 sf of office, and 794 residential units. Under the High Residential/Low Office scenario, this alternative would reduce proposed development by 54,850 sf of general retail/restaurant, 25,000 sf of office, and 811 residential units. Additionally, the proposed 120-room hotel would not be implemented under either scenario. As with the proposed project, this alternative would require General Plan and Zoning Code amendments for properties to be developed. Development under this alternative would also be subject to the provisions of the FTC Specific Plan.

Under this alternative, the OCTA bus transfer station would not be relocated as proposed with the project; therefore, the FTC Parking Structure would be reduced by one level. While the amount of development on individual parcels north of the railroad tracks would be increased or reduced compared to the proposed project, due to the area available for development, the proposed development south of the railroad tracks would be nearly the same as that proposed with the project. As shown on exhibit 5-1, the east-west alley of the proposed project, which extended west from Pomona Avenue, between Commonwealth and Santa Fe Avenues, would be realigned to loop north from Santa Fe Avenue, because the existing bus terminal station is not being relocated.

Comparative Analysis of Environmental Impacts

Aesthetics

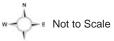
The Alternative Site Plan alternative would result in similar same short-term views of construction activity. Consistent with the impact determination for the proposed project, short-term visual changes associated with construction activities would be less than significant.

Long-term visual changes associated with areas to be developed under this alternative would be similar to the proposed project due to a similar scope of development and design standards. However, north of the railroad tracks the visual consistency with the FTC Specific Plan area



Alternative Site Plan Exhibit 5–1

Fullerton Transportation Center Specific Plan





would not be as prominent because the development areas would not be contiguous. Notably, east of Pomona Avenue residential development would be interspersed with existing industrial uses (refer to Exhibit 5-1). The FTC Specific Plan Regulating Code and design standards (refer to PDFs 1-1 through 1-6) are intended to ensure that proposed development would not visually degrade the FTC Specific Plan project area or surrounding area or cause substantial light and glare. Although to a lesser extent, as with the proposed project, the proposed redevelopment under this alternative would be considered an improvement to the existing visual quality of the project area.

As with the proposed project, this alternative would result in less than significant impacts related to visual quality and light and glare.

Air Quality

Even with implementation of identified SCs and MMs related to dust control and architectural coatings, local short-term (construction) emissions of PM10 and PM2.5 resulting from the proposed project were determined to be significant and unavoidable when conducting excavation activities (such as for subterranean parking) within approximately 250 feet of sensitive receptors after implementation of SCs and MMs. Because the anticipated construction activities for this alternative would be the same as the proposed project, including potential construction within 250 feet of sensitive receptors, this alternative would also result in a significant and unavoidable short-term impact for local emissions of PM10 and PM2.5.

Regional long-term (operational) emissions of criteria air pollutants for the proposed project were determined to be less than significant with implementation of Phase 1; however, significant and unavoidable emissions of VOC, NOx, and PM10 were identified with implementation of buildout of the FTC Specific Plan (project and cumulative impact). Although this alternative (under the High Residential/Low Office Scenario) would have less retail development (45,150 sf compared to 65,000 sf), and the same amount of office development (24,000 sf), because of the additional residential units under this alternative compared to Phase 1 (749 compared to 500 units) this alternative would have increased VOC emissions (primarily associated with consumer products). This alternative would generate approximately 58 pounds per day of VOC emissions which would exceed the established SCAQMD threshold of 55 pounds of VOC per day. Therefore, similar to the proposed project, this alternative would have a significant and unavoidable impact related to emissions of VOC. Emissions of NOx and PM10 would be less than significant; therefore, this alternative would avoid the proposed project's significant impact related to these emissions.

This alternative would not expose persons to substantial CO concentrations or TAC emissions from operations; however, similar to the proposed project, residential uses could be developed within 300 feet of the White Bear Cleaners (dry cleaning facility), potentially exposing residents to TACs. With implementation the identified mitigation (MM 2-2) this alternative would have a less than significant impact, consistent with the proposed project.

As with the proposed project, this alternative would not conflict with or obstruct implementation of the Air Quality Management Plan (AQMP), as the SCAQMD and SCAG used existing General Plan/zoning designations to forecast, inventory, and allocate regional emissions from land use and development-related sources. The trip generation from this alternative would be substantially less than anticipated by existing planning documents.

Cultural Resources

As identified in PDF 3-1 in Section 4.3, Cultural Resources, the FTC Specific Plan requires that historic structures be preserved/reused (not demolished). This alternative would not involve the removal of any identified historical structures and similar to the proposed project would have a less than significant impact. However, it should be noted that this alternative would not require the preservation of other historic resources within the FTC Specific Plan area, which would otherwise be preserved with the proposed project (refer to Exhibit 3.3-2).

Development under this alternative could occur adjacent to existing historic resources identified in Section 4.3, Cultural Resources, and similar to the proposed project has the potential to cause direct impacts due to vibration and construction and indirect impacts related to setting and design compatibility. As with the proposed project these impacts would be reduced to levels considered less than significant through implementation of the identified mitigation measures (MM 3-1 and 3-2) and required design review (PDF 3-2). Therefore, the proposed project and this alternative would have less than significant impacts to historical resources.

Although the development area is reduced, this alternative would have the same potential impacts to archaeological and paleontological resources during ground-disturbing activities as the proposed project. The potential impacts to archaeological and paleontological resources would also be mitigated to a level considered less than significant with implementation of MMs 3-5 and 3-6, consistent with the proposed project.

Geology and Soils

Similar to the proposed project, this alternative would require grading and earth movement throughout the project area. Based on the geotechnical evaluation completed for the proposed project, as described in Section 4.4 (Geology and Soils), there are no identified major geologic or seismic hazards. Geologic and seismic considerations (such as the potential for ground shaking, liquefaction, and subsidence, etc.) have been evaluated and determined to be manageable relative to proposed development with implementation of all geotechnical recommendations, which encompass Building Code standards. Given that the proposed type of development and construction activities for the proposed project and this alternative are similar, development under this alternative would have similar impacts as those associated with the proposed project. These impacts would be reduced to levels considered less than significant within implementation of identified SC 4-1, and MMs 4-1 and 4-2, consistent with the proposed project.

Hazards and Hazardous Materials

Under this alternative existing structures would be demolished, and other development activities would involve grading and excavation, similar to the proposed project. Therefore, potential impacts related to the exposure of construction workers to ACMs, LBPs and/or PCBs, which would occur with the development under the proposed project, would also occur with this alternative. Similarly, this alternative could expose construction workers and future site occupants to potential hazards from soil and/or groundwater contamination. These impacts would be reduced to levels considered less than significant with implementation of identified SCs 5-1 and 5-2 and MMs 5-1 through 5-5, consistent with the proposed project.

Hydrology and Water Quality

This alternative would implement the same program to manage stormwater runoff within the identified development areas as the proposed project as outlined in the FTC Specific Plan

Regulating Code (and described in PDFs 6-1 through 6-7). Similar to the proposed project, this alternative would result in decreased impervious area, reduced total runoff and decreased demand on the existing storm drain system through implementation of enhanced landscaping, civic spaces, BMPs related to LID practices, and compliance with applicable water quality regulations (as outlined in SCs 6-1 and 6-2). As with the proposed project, impacts from this alternative related to storm drainage and water quality would be less than significant.

The proposed Type B building immediately west of Lawrence Avenue and north of the railroad tracks (refer to Exhibit 5-1) would be within the 100-year flood plain [Zone AO (Depth 2) classification] shown on Exhibit 4.6-4. Phase 1 development area is not within the 100-year flood plain. Like the proposed project, this new building would be designed and constructed at least 1 foot above the 100-year flood water surface elevation (PDF 6-7). This alternative would have less than significant impacts to hydrology, water quality and flooding with implementation of PDFs, SCs and MMs, similar to the proposed project.

Land Use and Planning

As described previously, this alternative would involve a General Plan amendment, zone change and compliance with the relevant provisions of the FTC Specific Plan, including the Regulating Code (refer to PDFs 7-1, 7-2, 7-3, 7-5 and 7-6), for those areas that would be developed. The provisions of the Specific Plan described in these PDFs address the type of development allowed, and compatibility between residential and non-residential land uses, and would ensure that land use impacts are less than significant, consistent with the proposed project.

This alternative would generally achieve the goals of the relevant plans and programs of the City or SCAG regarding the redevelopment and revitalization of the downtown area, and encourage mixed use developments similar to the proposed project (refer to planning programs discussed in Section 4.7, Land Use and Planning), but not to the level anticipated at buildout of the FTC Specific Plan since it does not encompass the entire area that has been planned for redevelopment. However, as with the proposed project, this alternative would be consistent with the relevant goals and policies of applicable local and regional planning programs and would result in a less than significant impact.

Noise

Development under this alternative would result in the same short-term construction related, and long-term operational noise and vibration impacts, as identified for the proposed project (as summarized under the discussion of the Reduced Density/Reduced Development Area above). With the exception of significant unavoidable noise impacts when construction activities are within 80 feet of sensitive receptors, which would be significant and unavoidable, noise and vibration impacts would be reduced to levels considered less than significant within implementation of identified PDFs, SCs and MMs 4-1 and 4-2, consistent with the proposed project.

Population, Housing, and Employment

With the maximum development under the High Residential/Low Office scenario, implementation of this alternative would involve the development of up to 749 residential units and would generate approximately 2,194 new residents in the City of Fullerton, compared to

4,569 with the proposed project under the same scenario.⁵ Although there would be an approximate 52 percent reduction in the amount of housing and associated population growth generated under this alternative when compared to the proposed project, it would still exceed the amount and rate of growth anticipated by the City based on the existing General Plan land use designations and Zoning for the project area. Therefore, the significant unavoidable impact resulting from the proposed project would also occur with this alternative.

Because of the reduction in housing compared to the proposed project, the City's goals and objectives to provide diversified housing of all types and tenures (type and price), as set forth in its recently adopted 2006-2014 Housing Element certified by HCD, would be hindered. To meet the City's Regional Housing Needs Assessment (RHNA) obligations, the Housing Element identifies numerous parcels within the FTC Specific Plan area as target sites for rezoning to accommodate new residential development through infill redevelopment. The rezoning would be to densities that cover very low- and low-income RHNA allocations.

Under the High Office/Low Residential scenario for this alternative there would be up a net increase of 25 employees (271 new jobs and 246 jobs eliminated with removal of existing structures), compared to a net increase of 113 jobs with the proposed project. As with the proposed project, the indirect growth from this alternative resulting from additional employment opportunities would not result in a significant impact. It should also be noted that the other non-residential land uses within the FTC Specific Plan area that would not be developed under this alternative would remain operational and existing employment would not be affected.

Public Services and Recreation

This alternative would create new demands for public services (police protection, fire protection, schools, libraries, and parks/recreation), from residential and non-residential uses but these demands would be less than for the proposed project because there would be a reduction in the amount of residential development (up to 749 units compared to 1,560 with the proposed). Residential uses and the associated increase in population generate the greatest demand for public services. As with the proposed project, this alternative would require relocation of the existing Fire Station No. 1. Consistent with the FTC Specific Plan, civic spaces would be implemented under this alternative (PDF 10-2), but these would be limited to the Transit Plaza and Transit Courtyard, and common open space for residents (PDF 10-3). Potential impacts to public services from the proposed project were determined to be less than significant with incorporation of PDFs and SCs (regarding fire protection and payment of school and park fees). Potential public service impacts resulting from this alternative would also be less than significant, consistent with the proposed project.

Transportation and Traffic

The proposed project would generate short-term construction and long-term operational traffic. Because the amount and type of construction activities would be similar to the proposed project, the short-term construction-related traffic impacts resulting from the proposed project would also occur with this alternative. With implementation of SCs 11-2 and 11-3 and MM 11-4 which address construction traffic, these impacts would be less than significant with the proposed project and this alternative.

Under the High Office/Low Residential scenario for this alternative there would an increase in population of 2,106 people.

Under the High Residential/Low Office scenario for this alternative there would a net decrease of 70employees.

The High Office/Low Residential development scenario for this alternative would generate 6,382 daily trips (ADT), 369 AM peak hour trips, and 604 PM peak hour trips,⁷ compared to 9,342 ADT, 468 AM peak hour and 857 PM peak hour trips with the proposed project (buildout of the FTC Specific Plan). This trip generation takes into account the same TOD trip reduction and internal trip capture assumptions as the proposed project. Additionally, this alternative would include implementation of the roadway and intersection improvements identified for the proposed project (PDF 11-1).

With the exception of significant unavoidable impact at the intersection of Orangethorpe Avenue and Lemon Street, transportation and traffic impacts (intersections [including CMP intersections], freeway mainline, non-vehicular circulation, emergency access and parking) would be less than significant for this alternative and the proposed project, within implementation of identified PDFs, SCs and MMs.

As with the proposed project, the impact at the intersection of Orangethorpe Avenue and Lemon Street could be mitigated to a less than significant level with physical improvements (refer to MM 11-1). However, the City of Fullerton cannot guarantee that mitigation in another jurisdiction will be implemented, resulting in a significant and unavoidable impact. This alternative would avoid the impact at Harbor Boulevard and Chapman Avenue which occurs in the Year 2035 with buildout of FTC Specific Plan. However, this impact is mitigated to a less than significant level with the proposed project.

Utilities and Service Systems

This alternative would create new demands on local utility providers. Due to the reduced amount development under this alternative, compared to the proposed project, the amount of wastewater and solid waste generation, and consumption of water and energy would be reduced. Consistent with the proposed project, this alternative would require that new infrastructure be installed to serve the proposed development (PDFs 12-1, 12-2 and 12-4); however, there are utilities within or adjacent to the project area to serve this alternative. The physical environmental impacts from installation of new utilities addressed for the proposed project (disturbance within existing street right-of-way and associated air quality, noise, and traffic impacts) would also occur under this alternative. The proposed project and this alternative would not require installation of new utility infrastructure outside of the FTC Specific Plan area (with the exception of the new sewer lines in Santa Fe Avenue and Highland Avenue currently being constructed by the City). As with the proposed project, developers would be required to pay fair share costs for the sewer line upgrade recently completed by the City (MM 12-1). Potential impacts from the proposed project were determined to be less than significant with incorporation of the mitigation program, and potential utility impacts resulting from this alternative would also be reduced to less than significant levels.

Based on the reduced land use intensity, this alternative would consume less water than the proposed project. However, as with the proposed project, development under this alternative would be required to have a net zero impact on the City's existing water supply sources (PDF 12-3); therefore, the actual amount of water consumed on a city-wide basis would be similar. Even without the requirement for the project (and this alternative) to have a net zero impact on the City's water supply sources, there would be sufficient water supply for the proposed project (FTC Specific Plan buildout) and this alternative.

Greenhouse Gas Emissions

The High Residential/Low Office development scenario for this alternative would generate 6,234 ADT, 340 AM peak hour trips and 579 PM peak hour trips.

As with development under the proposed project, this alternative would generate greenhouse gas emissions during construction and operation. This analysis assumes that all measures applied to the proposed project to reduce greenhouse gas emission would be applicable to development under this alternative (within the identified development area).

Under the Alternative Site Plan alternative assuming the High Office/Low Residential scenario, greenhouse gas emissions (GHG) would be approximately 13,430 MTCO2e per year, compared to 22,561 MTCO2e with the proposed project. The reduction in emissions is associated with the reduced amount of development and associated ADT and vehicle miles traveled. The total service population under this alternative would be 2,131 (employees and residents) compared to 4,544 for the proposed project. This results in a ratio of total GHG emissions to service population of 6.3 MTCO2e, which would exceed the established significance threshold of 4.6 MTCO2e/service population/year (residents plus employees). Because the reduction in service population is greater than the reduction in GHG emissions compared to the proposed project, the GHG efficiency ratio is increased. This alternative (under both development scenarios) would result in a significant unavoidable impact related to GHG emissions; the proposed project would have a less than significant impact for this issue.

Conclusions

Ability Avoid or Substantially Lessen the Significant Impacts of the Project

As identified previously, due the reduced density associated with the Alternative Site Plan alternative, similar or reduced impacts would occur compared to the proposed project for each topical issue with the exception of GHG emissions. Although the development area would be reduced, the construction activities for individual projects under the FTC Specific Plan would be similar in scope (including disturbance area, equipment, etc.). Therefore, construction-related impacts are generally the same for this alternative and the proposed project.

Although the amount of development would be reduced, the following significant and unavoidable impacts that result from the proposed project (build-out of the FTC Specific Plan) would occur with this alternative:

- Air Quality: local exposure to short-term, construction-related emissions of PM10 and PM 2.5 exceeding ambient air quality standards; exposure of sensitive receptors to PM10 and PM2.5 emissions that exceed the 24-hour ambient air quality standard during the mass grading and excavation phase; and regional long-term project and cumulative emissions of VOC.
- Noise: short-term construction noise levels within 80 feet of sensitive receptors could be substantially greater than existing ambient noise levels.
- Population, Housing and Employment: substantial increase in population and housing growth beyond projections for the project area resulting in project and cumulative impacts.
- Transportation and Traffic: implementation of this alternative would significantly impact
 the intersection of Orangethorpe Avenue and Lemon Street using the City of Anaheim
 intersection capacity utilization (ICU) methodology for analyzing impacts. The

Under the High Residential/Low Office scenario GHG emissions would be 13,163 MTCO2e, the service population would be 2,124, and the ratio of total GHG emissions to service population would be 6.2 MTCO2e.

Orangethorpe Avenue and Lemon Street intersection is also under the jurisdiction of the City of Anaheim.

Although the total amount of emissions would be reduced, this alternative would result in significant and avoidable impacts related to GHG emissions that would not occur with the proposed project. This alternative would avoid long-term operational regional project-related and cumulative emissions of PM10 and NOx, which would occur with implementation of the proposed project.

Attainment of Project Objectives

Development of the Alternative Site Plan alternative would result in less development for all land types (including elimination of the proposed hotel) when compared to the maximum buildout of the FTC Specific Plan. Although this alternative would have similar or reduced impacts compared to the proposed project, it would not meet the following project goals and objectives to the same extent, primarily because of the reduced development area, and the fact that proposed development north of the railroad tracks would be largely spread out and interspersed with existing development within the FTC Specific Plan area which would remain in its current condition.

Goal 1: Create buildings, public spaces, streets, and infrastructure that contribute to a sustainable built environment.

Objective 1C: Maintain the character and important features of designated Historic Buildings.

Objective 1D: Create buildings with an active and positive ground-floor presence along streets and civic spaces.

Objective 1E: Design contemporary and highly-articulated buildings that create a positive image for the Downtown.

Objective 1F: Improve and expand the existing circulation network to create a pedestrian-friendly environment that supports walking, bicycling and transit ridership.

This alternative would generally achieve Goal 1 to create buildings, public spaces, streets, and infrastructure that contribute to a sustainable built environment; however, design objectives would be met related to streets and civic spaces (Objective 1D) and improved non-vehicular circulation (Objective 1F), it would occur within a reduced development area. Additionally, because the development north of the railroad tracks would not be contiguous as proposed with the project, the ability to create a positive image for the Downtown would be reduced (Objective 1E). Although this alternative would not result in the removal of historic structures, it would not provide the same protection to the number of historic structures that is provided by the FTC Specific Plan, which requires preservation of all historic structures within the FTC Specific Plan project area (Objective 1C).

Goal 2: Create a mixed-use neighborhood that contributes toward a sustainable Downtown economy.

Objective 2A: Increase the customer base for downtown businesses by increasing the resident and office population near the Train Depot.

Objective 2B: Improve the economic diversity of Downtown Fullerton by creating attractive commercial space near the Fullerton Train Depot.

Objective 2C: Enhance the long-term vitality, functionality, and desirability of Downtown properties by redeveloping underutilized properties near the Fullerton Train Depot.

Objective 2D: Create development regulations that allow a variety and mix of uses based on changing market conditions.

Objective 2E: Create development regulations that allow a mix of neighborhood-serving, transit-serving, and family-oriented retail uses, including a mix of national, regional, and independent retailers.

While the development under this alternative would involve various land uses, it would not contribute toward a sustainable Downtown economy (Goal 2) to the same degree as the proposed project because of the reduced residential development/customer base. The reduction in residential units, office and retail uses, and removal of the hotel, reduces the benefits of the proposed project that resulted from the provision of mixed-uses. Additionally, the reduction in development area minimizes the ability to redevelop/revitalize the project area in downtown Fullerton and improve the economic diversity, as many parcels north of the railroad tracks would remain with primarily industrial-related uses and be underutilized (refer to Objectives 2A through 2E).

Goal 3: Create a mixed-use and transit-oriented neighborhood that contributes to a sustainable natural environment.

Objective 3A: Decrease dependency on the automobile by providing new housing, employment, shopping, dining, and recreational opportunities at the Fullerton Transportation Center.

Objective 3B: Encourage the reduction of per capita vehicle miles traveled and per capita greenhouse gas emissions (when compared to non-transit-oriented development) by increasing opportunities for walking, bicycling, and transit ridership.

Objective 3C: Improve access between bus and rail transit by creating an enhanced bus depot near the Fullerton Train Depot.

Objective 3D: Include pedestrian and bike connections as key elements in the project.

This alternative would contribute to a sustainable natural environment through creation of a mixed-use and transit-oriented neighborhood (Goal 3), but not to the same extent as the proposed project since the area to be developed is limited and not contiguous. Compared to the buildout of the FTC Specific Plan in its entirety, the reduction in residential development under this alternative reduces the benefits gained related to decreasing dependency on the automobile, and reducing vehicle miles traveled (Objective 3A and 3B). This is best demonstrated through the increase in the ratio of total GHG emissions to service population. The OCTA Bus Depot would remain in its current location, so improved access between bus and rail transit, which is accomplished by the proposed project, would not occur (Objective 3C). Additionally, while pedestrian and bicycle connections within the development area would be implemented under this alternative, the additional connectivity provided by the proposed project would not occur (such as the Rail Promenade over and east of Lemon St.), and overall effectiveness of the existing and proposed facilities would be reduced (Objective 3D).

Goal 4: Develop and promote a framework for a sustainable community lifestyle.

Objective 4A: As part of the mixed-use environment, incorporate cultural and civic spaces, such as a Transit Plaza, neighborhood parks, paseos, and courtyards.

Objective 4B: Develop outdoor spaces and amenities that accommodate the needs of various demographics, including commuters, residents, visitors, shoppers, and families with children.

Objective 4C: Diversify the City's housing options by providing a range of housing types that are affordable to a variety of income levels and contribute to the city's Regional Housing Needs Assessment (RHNA) obligation.

Objective 4D: Increase opportunities to meet the City of Fullerton's regional affordable housing allocations by increasing densities near the Downtown and the Fullerton Transportation Center.

Objective 4E: Provide outdoor areas for residents, visitors, and commuters that promote interaction and serve as community gathering spaces.

Objective 4F: Reflect the significance of the railroad, agriculture history, and music within civic spaces and streetscapes.

Because of the non-contiguous and reduced development area under this alternative, none of the goals or objective related to developing a sustainable community lifestyle would be met to the same extent as the proposed project (Goal 4 and Objectives 4A through 4E). While some of the civic spaces and common open space for residential areas within the development area would be implemented under this alternative, the comprehensive open space/civic space program included as part of the FTC Specific Plan, designed to increase the availability of outdoor spaces and amenities for public gathering and other activities would not be accomplished. Additionally, the reduction in proposed residential units (maximum of 749 units compared to 1,560 with the proposed project), would limit the ability of the City to meet its RHNA obligation (Objective 4C), and opportunities for affordable housing (Objective 4D).

It should be noted that this alternative would meet the remaining objectives related to designing buildings to meet identified LEED standards (Objective 1A and 1B), utilizing low impact development techniques to improve the quality of stormwater runoff and to minimize impacts on downstream drainage systems (Objective 3E), and ensuring that new development has a net zero impact on the City's existing water supply sources (Objective 3F).

5.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires the identification of environmentally an superior alternative. Section 15126.6(e)(2) of the CEQA Guidelines states that if the No Project Alternative is the environmentally superior alternative, then the EIR shall also identify an environmentally superior alternative among the other alternatives. The Reduced Density/Reduced Development Area Alternative (development of Phase 1 of the FTC Specific Plan only) would represent the environmentally superior alternative. As noted in the analysis above, this alternative would have similar or reduced levels of impacts compared to the proposed for most of the topical issues. This alternative would have less residents and vehicle trips and therefore would avoid regional long-term project and cumulative air pollutant emissions of VOC, PM10, and NOx which would be significant and avoidable with implementation of the proposed project. Additionally, while this alternative would result in a significant and unavoidable impact from increased GHG emissions that would not occur with the proposed project, this impact is based on the ratio of GHG emissions to the service population. The total amount of GHG emissions would be less than half that anticipated with the proposed project (9,762 MTCO2e per year compared to 22,561 MTCO2e with the proposed project).

This alternative would meet the project goals and objectives which, in summary, are to: create buildings, public spaces, streets, and infrastructure that contribute to a sustainable built environment; create a mixed-use neighborhood that contributes toward a sustainable Downtown economy; create a mixed-use and transit-oriented neighborhood that contributes to a sustainable natural environment; and develop and promote a framework for a sustainable community lifestyle. However, as discussed previously, these goals and objectives are not met to the same extent as the proposed project. The overall intent of the FTC Specific Plan is to accomplish these goals throughout the entire FTC Specific Plan area. Implementing only a portion of the development hinders the ability of the City to fully accomplish the envisioned redevelopment/revitalization anticipated for the Fullerton Transportation Center in the Downtown area of the City. Additionally, as discussed previously, because of the reduction in housing compared to the proposed project, the City's goals and objectives to provide affordable housing, as set forth in its recently adopted 2006-2014 Housing Element certified by HCD, would be hindered.

In summary, the Reduced Density/Reduced Development Area alternative is the environmentally superior alternative, but it does not meet the goals and objectives of the FTC Specific Plan to the same extent as the proposed project.