



5.0 ALTERNATIVES

5.1 INTRODUCTION

The California Environmental Quality Act (CEQA) requires that an Environmental Impact Report (EIR) include a discussion of reasonable project alternatives that would “feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any significant impacts of the project, and evaluate the comparative merits of the alternatives” (*State CEQA Guidelines*, Section 15126.6). This chapter identifies potential alternatives to the Cypress City Center Project (proposed project), evaluates the potential impacts of each alternative, and compares the potential impacts of each alternative against the proposed project’s impacts, as required by CEQA.

Key provisions of the *State 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 that are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives or would be more costly (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 range of alternatives to the proposed project is considered and evaluated in this EIR. These alternatives were developed in the course of project planning and environmental review. The discussion in this section provides:

1. A description and analysis of impacts for each of the alternatives considered;
2. Comparative analysis of each alternative that focuses on the potentially significant unavoidable environmental impacts of the proposed project (the purpose of this analysis is to determine whether alternatives are capable of eliminating or reducing the significant environmental impacts of the project to a less than significant level); and
3. Conclusions regarding the alternative's: (1) ability to avoid or substantially lessen the significant unavoidable impacts of the project; (2) ability to attain the project objectives (as stated below); and (3) merits compared to the merits of the proposed project.

5.2 PROPOSED PROJECT

5.2.1 Project Objectives

As discussed in Section 1.3.1, Project Objectives, of this EIR, the following project objectives have been established to aid decision-makers in their review of the proposed project and its associated environmental impacts:

The following provides the objectives established for the proposed project, which include implementation of goals and policies from the City of Cypress (City) General Plan and the Specific Plan:

1. Provide uses that meet the City's General Plan balanced development goals and objective to locate higher density housing adjacent to commercial and employment opportunities to encourage pedestrian access and provide a consumer base for commercial uses (GP LU-1.4).
2. Provide a balanced mix of residential and commercial uses in the Cypress Business and Professional Center Specific Plan, which would promote a commercial environment that balances quality development with economic growth while building in flexibility to respond to the market demands (Cypress Business & Professional Center Specific Plan, Objectives 1.2 and 1.3).
3. Support the retention of local employers and increase the fiscal benefits to the City by attracting new retail, restaurant, hotel, and entertainment businesses that can better serve the local



population and employment and would generate additional revenue to the City through increased sales, property, and transient occupancy taxes (GP LU-17.1).

4. Meet the demand for new hotel rooms in the Cypress Business Center to serve the local business community.
5. Provide new drainage improvements on the project site, which would reduce the risk of downstream flooding hazards.
6. Provide a new community gathering place for Cypress residents and workers, including a public dog park and a landscaped plaza with outdoor dining areas.
7. Allow the City to divest itself of real estate conveyed to it by the Cypress Redevelopment Agency in March 2011 in accordance with the Settlement Agreement between the City of Cypress, the Successor Agency to the Cypress Redevelopment Agency, the State Department of Finance, and the State Controller's Office, which would facilitate the generation of additional revenue to the City by selling the land to a private owner, who would return the land to the property tax rolls and develop it with new revenue-generating uses.
8. Expand the variety of housing stock in the City, which would help meet the existing and future housing needs of all Cypress residents, by providing high density rental units (GP HOU-3.5).
9. Expand and improve the City's housing supply by developing high-quality housing in the City to alleviate the housing crisis and help the City meet its Regional Housing Needs Assessment allocations (GP HOU-4).

5.2.2 Significant Adverse Unavoidable Impacts of the Proposed Project

The following discussion focuses on alternatives that would reduce or avoid the significant adverse unavoidable impacts of the proposed project. As detailed in Section 4.7, Greenhouse Gas Emissions, the proposed project would result in significant, adverse, and unavoidable impacts related to greenhouse gas emissions after all mitigation is applied. These impacts are summarized below.

The proposed project would be designed in compliance with adopted regulations aimed at reducing greenhouse gas emissions. Specifically, the project would be designed and built to be 10 percent more energy-efficient than the 2019 Building Energy Efficiency Standards (California Code of Regulations [CCR] Title 24), or the current Title 24 requirements, whichever are more stringent. Although exceeding the current CCR Title 24 requirements would help to reduce the proposed project's greenhouse gas emissions, the overall emissions attributable to construction and operation of the proposed project of 7,208 metric tons of carbon dioxide equivalent per year (MT CO₂e/yr) are expected to exceed the South Coast Air Quality Management District (SCAQMD) thresholds of 3,000 MT CO₂e/yr. The greenhouse gas emissions of 7.9 metric tons of carbon dioxide equivalent per service population per year (MT CO₂e/SP/yr) would also exceed the SCAQMD threshold of 4.3 MT CO₂e/SP/yr for 2022. Therefore, the proposed project would result in a significant unavoidable project impact and significantly contribute to an unavoidable cumulative impact related to



greenhouse gas emissions and conflict with an applicable greenhouse gas reduction plan, policy, or regulations.

5.3 ALTERNATIVES INITIALLY CONSIDERED BUT REJECTED FROM FURTHER CONSIDERATION

Section 15126.6(c) of the *State CEQA Guidelines* suggests that EIRs identify any alternatives that were considered by the Lead Agency but were rejected during the scoping process and briefly explain the reasons underlying the Lead Agency's determination. In evaluating an appropriate range of alternatives to the proposed project, a number of alternatives were considered and rejected for differing reasons by the City of Cypress (City).

The following is a discussion of the development alternatives considered during the environmental review process and the reasons they were not selected for detailed analysis in this Draft EIR.

5.3.1 Alternative Sites

CEQA requires that the discussion of alternatives focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant impacts of the project. The key question and first step in the analysis is whether any of the significant impacts of the project would be avoided or substantially lessened by relocating the project. Only locations that would avoid or substantially lessen any of the significant impacts of the project need be considered for inclusion in the EIR (*State CEQA Guidelines*, Section 15126.6[f][2][A]). 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 Applicant/Developer can reasonably acquire, control, or otherwise have access to the alternative site (*State CEQA Guidelines*, Section 15126.6[f][1]). If it is determined that no feasible alternative locations exist, the EIR must disclose the reasons for this conclusion (*State CEQA Guidelines*, Section 15126.6[f][2][B]).

No alternative locations where the proposed project could be undertaken are analyzed in the Draft EIR. One of the fundamental purposes of the project is to facilitate the City's disposal of real estate conveyed to it by the Cypress Redevelopment Agency in March 2011 in accordance with the Settlement Agreement between the City of Cypress, the Successor Agency to the Cypress Redevelopment Agency, the State Department of Finance, and the State Controller's Office. The consideration of an alternative development site elsewhere in the City would not facilitate this important goal.

In addition, as discussed further below, there is no other property in the City that would support a development similar to the proposed project. The surrounding area is highly urbanized, and no land is currently available for development that is large enough (approximately 13 acres) to develop the proposed project in an area that would be compatible with the proposed residential and commercial/retail uses. In addition, the City and/or the Applicant/Developer does not own or control any other property within the City or in the vicinity of the project site that would be suitable for development of the proposed project. Moreover, the Applicant/Developer cannot reasonably



acquire or control an alternative site in a timely fashion that would allow for the implementation of a project with similar uses and square footage.

The following alternative sites were considered as potential alternatives to the project site, but eliminated for the reasons discussed above and below:

- 1) **Cypress Town Center and Commons Specific Plan 2.0:** The Cypress Town Center and Commons Specific Plan 2.0, approved by voters in 2018, covers an approximately 154.4-acre area located to the north of the project site and generally bound by Cerritos Avenue, Katella Avenue, and Lexington Drive. The Cypress Town Center and Commons Specific Plan 2.0 established a comprehensive master plan and regulatory framework to develop a town center, housing, and public park space in parts of the Los Alamitos Race Course, the former Cypress Golf Club, and adjacent property. The districts within the Cypress Town Center and Commons Specific Plan 2.0 are primarily designated for single-family residential, senior housing, or public parks. Although property may be available (such as the parking lot north of the project site) in these districts, the commercial uses included in the proposed project would not be compatible with the single-family residential, senior housing, or public parks uses intended in these areas. The Cypress Town Center and Commons Specific Plan 2.0 includes two mixed-use districts. The commercial and residential uses of the proposed project would be compatible with the uses intended in these districts by the Cypress Town Center and Commons Specific Plan 2.0. However, one of the mixed-use districts would be too small (4.2 acres) to accommodate the proposed project. Although the second mixed-use district, located to the west of the project site, would be large enough (15 acres) to accommodate the proposed project, the existing Seventh-Day Adventist Church would be displaced. In addition, according to the Cypress Town Center and Commons Specific Plan 2.0, it is anticipated that no development would occur within the mixed-use districts until the Los Alamitos Race Course ceases operation. At this time, there is no indication that the owners of the Los Alamitos Race Course intend to close this facility. Therefore, development of the proposed project within the Cypress Town Center and Commons Specific Plan 2.0 is not a feasible option.
- 2) **Lincoln Avenue Specific Plan.** The Lincoln Avenue Specific Plan covers the area along Lincoln Avenue between Buena Park on the east and Hawaiian Gardens on the west. The Lincoln Avenue Specific Plan established a comprehensive master plan and regulatory framework to guide development in the plan area. Within the plan area, the majority of the available parcels are not large enough to accommodate the proposed project. An approximately 14-acre parcel located at 4552 Lincoln Avenue, developed with a self-storage facility, was previously considered to be developed with a residential development. However, the residential development is no longer being considered on this property, so it could feasibly be available for development of the project. However, neither the City nor the Applicant/Developer owns or controls this property. The property site is designated for residential uses in the Lincoln Avenue Specific Plan; therefore, a specific plan amendment would be required to allow for development of the commercial and retail uses on the project site. Additionally, this property is a rectangular property with limited frontage along Lincoln Avenue. Because good street visibility is necessary to make retail and commercial



uses viable, and this property is not highly visible from Lincoln Avenue, this site is not a viable alternative site for the proposed project.

- 3) **Former Mitsubishi Motors Property.** In 2019, Mitsubishi Motors relocated its headquarters from 6400 Katella Avenue. The approximately 22-acre property is developed with office buildings, but is currently unoccupied. Therefore, it is conceivable the property could be available for development of the proposed project. However, development of the proposed project on this site would require demolition of the existing office buildings. Additionally, neither the City nor the Applicant/Developer owns or controls this property. Finally, the property is currently zoned for the Planned Community Zone (PC-2): Cypress Corporate Center and the surrounding properties are developed with office uses. The residential and commercial/retail uses proposed as part of the proposed project would not be compatible with the corporate/office land uses within the Cypress Corporate Center planned community. Therefore, this site is not a viable alternative site for the proposed project.

Development of the proposed project at an alternative site (assuming one was available) could potentially result in some environmental impacts that would be similar to or greater than those of the proposed project's environmental impacts, depending on the proximity of the alternate site to sensitive uses. Conversely, given that the project site is located in a highly urbanized area, it is unlikely that relocating the proposed project to another site would substantially lessen any of its impacts. Additionally, developing the project on a different site would not reduce the significant unavoidable impacts related to greenhouse gas emissions because the greenhouse gas emissions are primarily dependent on the construction activities and proposed on-site uses and not on the location of the project. This, of course, assumes that an alternative development site would also be located in an urbanized area with equal access to housing, jobs, and services as that of the project site. Siting the project in a rural area that is far from housing, jobs, and services would greatly increase the vehicle miles traveled associated with the project, which would also increase the project's greenhouse gas emissions.

As such, no alternative sites were considered feasible because, as discussed above, one of the fundamental purposes of the project is to facilitate the City's sale of the project site. In addition, neither the City nor the Applicant/Developer owns or controls another project site in the City, no suitable alternative site is available that would achieve the underlying purpose and objectives of the proposed project, development of the proposed project on an alternative site would likely result in many of the same environmental impacts as development of the proposed project on the project site and would not reduce the significant, unavoidable impacts related to greenhouse gas emissions. For these reasons, this alternative was rejected from further consideration.

5.4 ALTERNATIVES UNDER CONSIDERATION

Section 21100 of the Public Resources Code (PRC) and Section 15126 of the *State CEQA Guidelines* require an EIR to identify and discuss a No Project Alternative and a reasonable range of alternatives to the proposed project that would feasibly attain most of the basic objectives of the project and would avoid or substantially lessen any of the significant environmental impacts. Based on the criteria listed above, the following three alternatives have been determined to represent a reasonable range of alternatives that have the potential to feasibly attain most of the basic



objectives of the proposed project but that may avoid or substantially lessen any of the significant impacts of the proposed project. Therefore, the alternatives considered in this EIR include the following:

- **Alternative 1: No Project Alternative:** CEQA requires analysis of a “No Project” Alternative. The purpose of describing and analyzing a no project alternative is to allow decision-makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project. According to *State CEQA Guidelines* Section 15126.6(e)(3)(C), the lead agency should proceed to analyze the impacts of the no project alternative by projecting 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. The No Project Alternative assumes that the project site would remain in the same condition as it was at the time the Notice of Preparation (NOP) was published and no new development of any kind would occur on the project site. The project site would remain a paved parking lot that would continue to be used for vehicle parking during events at the nearby Los Alamitos Race Course. Other short-term uses of the project site would also continue, including use as a Christmas tree lot, a truck staging area, and auxiliary truck and trailer storage.
- **Alternative 2: Reduced Project Alternative.** The Reduced Project Alternative includes a mixed-use development on the project site with the same commercial uses (e.g., hotel, retail, and restaurant uses) as the proposed project, but with a reduced residential component, no movie theater, and an increased retail component. The Reduced Project Alternative includes construction of six retail buildings accommodating 41,600 square feet (sf) of retail and restaurant uses. In addition, the Reduced Project Alternative includes development of 80 residential units at a density of 6.02 dwelling units per acre (du/ac) on the 13.29-acre project site. The residential units would include a combination of two-story condominium buildings arranged around motor courts and three-story row townhomes. Because of the reduced residential uses, the above-grade parking structure would not be required to serve the residents on the project site. The Reduced Project Alternative includes the same size hotel (120 rooms with approximately 96,800 sf) as the proposed project.
- **Alternative 3: Commercial/Retail Alternative.** The Commercial/Retail Alternative includes development of 122,556 sf of major retail space, 21,000 sf of other retail/quick-serve restaurant space, and 9,353 sf of sit-down restaurant space on the project site. The Commercial/Retail Alternative includes construction of one building with four major retail tenants, one freestanding restaurant pad, and three retail/restaurant buildings. The Commercial/Retail Alternative also includes construction of a surface parking lot with 717 parking stalls. The project site was entitled until recently for development of the Commercial/Retail Alternative, which was environmentally cleared in the 2008 IS/MND that was prepared for the project site. However, these entitlements have since expired.

For the purpose of this analysis, it is assumed that all of the alternatives would comply with applicable federal, State, and local regulations, policies, and ordinances. The alternatives are further described below and their potential impacts compared to those of the proposed project.



5.5 ALTERNATIVES ANALYSIS

5.5.1 Aesthetics

The City is almost entirely developed and there are no designated scenic corridors, scenic vistas, or scenic highways within the City. The project site is also located within an urbanized area. The proposed Specific Plan Amendment does include minor amendments to the design guidelines included in the Specific Plan to allow super graphics (large graphics) and projecting signage for the proposed movie theater structure. With approval of the Specific Plan Amendment, the proposed project would be consistent with the Specific Plan design guidelines for the project site. Additionally, the proposed project's building heights would be similar to and compatible with the commercial, office, and business park uses that surround the project site. Therefore, impacts related to degradation of existing visual character or quality would be less than significant. Construction-related illumination during evening and nighttime hours would be used for safety and security purposes only. In addition, although the proposed project would increase the overall intensity of on-site land uses and associated lighting, lighting would comply with all applicable lighting standards in the Cypress Zoning Ordinance and would not result in substantial increases in light intensity at off-site locations. The materials of the proposed buildings would primarily be non-reflective to minimize glare. Therefore, impacts related to light and glare would be less than significant. No mitigation would be required.

5.5.1.1 Alternative 1: No Project Alternative

The No Project Alternative would not require any grading, site work, or removal of vegetation because no new development would occur on the project site. In addition, no buildings would be constructed on the project site. As such, the proposed project would result in no impacts to scenic vistas or scenic highways. The project site is currently developed with a parking lot, which produces light and glare from the on-site light poles and vehicles utilizing the parking lot in the evenings. However, because the No Project Alternative would not include construction activities, construction of new buildings, or intensification of the on-site lighting sources, the No Project Alternative would not result in impacts related to visual character or quality or light and glare. Therefore, aesthetic impacts would be less than the proposed project. However, the No Project Alternative would not result in improved landscaping along Katella Avenue or the off-site landscaping along Siboney Street included under the proposed project.

5.5.1.2 Alternative 2: Reduced Project Alternative

The Reduced Project Alternative would develop the project site with a mixed-use development with the same commercial uses (e.g., hotel, retail, and restaurant uses) as the proposed project, but with a reduced residential component, no movie theater, and an increased retail component. There are no scenic corridors, scenic vistas, or scenic highways within the City; therefore, like the proposed project, the Reduced Project Alternative would not result in impacts to scenic vistas or scenic highways. Unlike the proposed project, the Reduced Project Alternative would be consistent with the Specific Plan design guidelines for the project site and would not require any minor amendments to the design guidelines. Additionally, the building heights would be similar to and compatible with the commercial, office, and business park uses that surround the project site. Therefore, impacts related to degradation of existing visual character or quality would be less than



significant and similar to the proposed project. Like the proposed project, construction-related illumination during evening and nighttime hours would be used for safety and security purposes only. In addition, although the Reduced Project Alternative would increase the overall intensity of on-site land uses and associated lighting, lighting would comply with all applicable lighting standards in the Cypress Zoning Ordinance and would not result in substantial increases in light intensity at off-site locations. The materials of the proposed buildings would primarily be non-reflective to minimize glare. Therefore, impacts related to light and glare would be less than significant. However, the Reduced Project Alternative would result in a smaller project overall compared to the proposed project and would therefore result in aesthetic impacts that are less than the proposed project.

5.5.1.3 Alternative 3: Commercial/Retail Alternative

The Commercial/Retail Alternative would develop the project site with retail and restaurant uses. The same grading footprint would be required compared to the proposed project. There are no scenic corridors, scenic vistas, or scenic highways within the City; therefore, like the proposed project, the Commercial/Retail Alternative would not result in impacts to scenic vistas or scenic highways. Unlike the proposed project, the Commercial/Retail Alternative would be consistent with the Specific Plan design guidelines for the project site and would not require any minor amendments to the design guidelines. However, the building heights (one-story) would be substantially less than the proposed project. The Commercial/Retail Alternative buildings would be similar to and compatible with the commercial, office, and business park uses that surround the project site. Therefore, impacts related to degradation of existing visual character or quality would be less than significant and similar to the proposed project. Like the proposed project, construction-related illumination during evening and nighttime hours would be used for safety and security purposes only. In addition, although the Commercial/Retail Alternative would increase the overall intensity of on-site land uses and associated lighting, lighting would comply with all applicable lighting standards in the Cypress Zoning Ordinance and would not result in substantial increases in light intensity at off-site locations. The materials of the proposed buildings would primarily be non-reflective to minimize glare. Therefore, impacts related to light and glare would be less than significant. The Commercial/Retail Alternative would result in a smaller scale project overall compared to the proposed project and would therefore result in aesthetic impacts that are less than the proposed project.

5.5.2 Air Quality

Air quality emissions associated with construction and operation of the proposed project would not exceed South Coast Air Quality Management District (SCAQMD) significance thresholds. Therefore, impacts of the proposed project related to the cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under applicable National Ambient Air Quality Standards (NAAQS) or California Ambient Air Quality Standards (CAAQS) would be less than significant. The proposed project would not exceed SCAQMD localized significance thresholds (LSTs); therefore, impacts related to exposure of sensitive receptors would be less than significant. The proposed project is consistent with the SCAQMD Final 2016 Air Quality Management Plan (AQMP) because (1) the construction and operation emissions of the proposed project would not exceed the regional significance thresholds or cause or contribute to NAAQS or CAAQS violations, and (2) increases in population and housing resulting from the proposed project would not represent a



substantial increase in population growth. Therefore, impacts related to conflict or obstruction of implementation of the applicable air quality plan would be less than significant. Finally, odors would be limited to odors generated during construction and operational odors from the restaurants and trash receptacles, which would be confined to the project site. Therefore, impacts related to odors would be less than significant. No mitigation is required.

5.5.2.1 Alternative 1: No Project Alternative

The No Project Alternative would not require grading or construction and would not change the existing on-site use or increase vehicle trips to and from the project site. Therefore, no additional air pollutant emissions related to grading, construction, additional vehicle trips, and operational uses would be generated under this alternative, and no air quality impacts would occur. During operation, fewer emissions would be generated (primarily from the reduced vehicle trips) compared to the proposed project, and no construction emissions would occur. As such, the No Project Alternative's impacts on air quality would be less than the air quality impacts associated with the proposed project.

5.5.2.2 Alternative 2: Reduced Project Alternative

The Reduced Project Alternative would develop the project site with a mixed-use development with the same commercial uses (e.g., hotel, retail, and restaurant uses) as the proposed project, but with a reduced residential component, no movie theater, and an increased retail component. A similar grading footprint but less construction would be required for the Reduced Project Alternative compared to the proposed project; therefore, construction emissions would be less than the proposed project and less than significant. The Reduced Project Alternative would generate fewer vehicle trips than the proposed project because there would be fewer residential uses and no movie theater, and the expanded retail component would generate fewer vehicle trips than a 10-screen movie theater. Therefore, this alternative would result in fewer residents and visitors to the project site. As a result, emissions generated during operation of the Reduced Project Alternative would be less than the proposed project and would not exceed the SCAQMD thresholds. As such, air quality impacts of the Reduced Project Alternative would be less than significant and less than the proposed project.

5.5.2.3 Alternative 3: Commercial/Retail Alternative

The Commercial/Retail Alternative would develop the project site with retail and restaurant uses. The same grading footprint would be required compared to the proposed project. However, the Commercial/Retail Alternative would require less building construction activities because the total building square footage would be approximately 320,000 sf less than the proposed project. The Commercial/Retail Alternative would have lower peak VOCs, SO_x, PM_{2.5}, and PM₁₀ emissions but greater peak NO_x and CO emissions than the proposed project. The Commercial/Retail Alternative would generate similar area source emissions compared to the proposed project. However, the Commercial/Retail Alternative would generate 1,225 more daily vehicle trips than the proposed project and would therefore generate more vehicle emissions and more total emissions than the proposed project. Therefore, emissions generated during operation of the Commercial/Retail Alternative would be greater than the proposed project. However, construction and operational emissions of the Commercial/Retail Alternative would not exceed the SCAQMD thresholds. As such,



air quality impacts of the Commercial/Retail Alternative would be less than significant and greater than the proposed project.

5.5.3 Biological Resources

The project site is highly disturbed and developed with an asphalt-paved parking lot and does not support special-status species, riparian habitat, or wetlands and is not located within a Natural Communities Conservation Plan/Habitat Conservation Plan (NCCP/HCP). Therefore, the proposed project would not result in impacts to special-status species, riparian habitat, wetlands, or NCCP/HCPs. The small amount of ornamental vegetation, including trees, along Katella Avenue would be removed outside of the nesting season to reduce impacts to nesting raptors and migratory birds. Therefore, impacts to wildlife movement and wildlife corridors would be less than significant. None of the trees on the project site are designated as Landmark Trees. In addition, work on street trees would be done in accordance with the City Council's adopted Parkway Tree Policy; therefore, impacts to local street trees would be less than significant. No mitigation is required.

5.5.3.1 Alternative 1: No Project Alternative

The No Project Alternative would not require any grading, site work, or removal of vegetation because no new development would occur on the project site. In addition, no buildings would be constructed on the project site. Because the No Project Alternative would not involve construction activities or removal of the on-site vegetation, no impacts to biological resources would occur. Therefore, impacts to biological resources would be less than significant and less than that of the proposed project.

5.5.3.2 Alternative 2: Reduced Project Alternative

The Reduced Project Alternative would develop the project site with a mixed-use development with the same commercial used (e.g., hotel, retail, and restaurant uses) as the proposed project, but with a reduced residential component, no movie theater, and an increased retail component. As stated above, the project site is highly disturbed and developed with an asphalt-paved parking lot and does not support special-status species, riparian habitat, or wetlands and is not located within an NCCP/HCP. Therefore, the Reduced Project Alternative would not result in impacts to special-status species, riparian habitat, wetlands, or NCCP/HCPs. Similar to the proposed project, the small amount of ornamental vegetation, including trees, along Katella Avenue would be removed outside of the nesting season to reduce impacts to nesting raptors and migratory birds. Therefore, impacts to wildlife movement and wildlife corridors would be less than significant. None of the trees on the project site are designated as Landmark Trees. In addition, work on street trees would be done in accordance with the City Council's adopted Parkway Tree Policy; therefore, impacts to local street trees would be less than significant. Because the same grading footprint would be required compared to the proposed project, and construction would occur on the same project site, impacts to biological resources would be the same as the proposed project.

5.5.3.3 Alternative 3: Commercial/Retail Alternative

The Commercial/Retail Alternative would develop the project site with retail and restaurant uses. The same grading footprint would be required compared to the proposed project. As stated above, the project site is highly disturbed and developed with an asphalt-paved parking lot and does not



support special-status species, riparian habitat, or wetlands and is not located within an NCCP/HCP. Therefore, the Commercial/Retail Alternative would not result in impacts to special-status species, riparian habitat, wetlands, or NCCP/HCPs. Similar to the proposed project, the small amount of ornamental vegetation, including trees, along Katella Avenue would be removed outside of the nesting season to reduce impacts to nesting raptors and migratory birds. Therefore, impacts to wildlife movement and wildlife corridors would be less than significant. None of the trees on the project site are designated as Landmark Trees. In addition, work on street trees would be done in accordance with the City Council's adopted Parkway Tree Policy; therefore, impacts to local street trees would be less than significant. Because the same grading footprint would be required compared to the proposed project, and construction would occur on the same project site, impacts to biological resources would be the same as the proposed project.

5.5.4 Cultural Resources

The South Central Coastal Information Center (SCCIC) record search results and archaeological pedestrian field survey identified no previously recorded cultural resources on or in soils on the project site. The proposed project would not cause a substantial adverse change in the significance of a historical resource. Although there is a low likelihood of encountering intact buried archaeological deposits during ground-disturbing construction activities, implementation of mitigation would reduce any potential impacts of the proposed project on the significance of archaeological resources to a less than significant level by requiring that a qualified professional archaeologist provide cultural resources awareness training prior to the commencement of ground-disturbing activities and that a qualified professional archaeologist be retained on-call in the event that construction personnel encounter any archaeological deposits and/or human remains during construction activities. No previously identified human remains are present on the project site, and there are no facts or evidence indicating that Native Americans or people of European descent are buried on the project site. However, undiscovered human remains may be present below the ground surface on any property. Compliance with the State's Health and Safety Code for the treatment of human remains would reduce the impact of the proposed project on human remains to less than significant.

5.5.4.1 Alternative 1: No Project Alternative

The No Project Alternative would not require any grading or site work because no new development would occur on the project site. In addition, no buildings would be constructed on the project site. Therefore, the proposed project would not cause a substantial adverse change in the significance of a historical resource. Further, the No Project Alternative would not have the potential to disrupt human remains or result in the discovery of previously unknown archaeological resources. No impacts related to cultural resources would occur; therefore, the impacts of the No Project Alternative would be less than that of the proposed project.

5.5.4.2 Alternative 2: Reduced Project Alternative

Similar to the proposed project, the Reduced Project Alternative would not cause a substantial adverse change in the significance of a historical resource as defined by CEQA because no previously recorded historical resources were identified in the project site. The Reduced Project Alternative would develop the project site with residential, retail, and hotel uses, but at a lower density than



the proposed project, and would require ground-disturbing construction activities for the development. Similar to the proposed project, the Reduced Project Alternative would have a low likelihood of encountering intact buried archaeological deposits and previously discovered buried human remains during ground-disturbing construction activities; however, the Reduced Project Alternative would require the installation of fewer geopiers and, therefore, would be incrementally less likely to disturb archaeological resources and human remains. The Reduced Project Alternative would be required to incorporate mitigation measures to reduce potentially significant impacts to archaeological resources by requiring cultural resources awareness training prior to the commencement of ground-disturbing activities and the retention of a qualified professional archaeologist on an on-call basis during construction. The Reduced Project Alternative would also be required to comply with Health and Safety Code Section 7050.5, which would reduce potentially significant impacts to previously undiscovered buried human remains. Implementation of this mitigation and adherence to regulatory standards would reduce potential impacts related to cultural resources to a less than significant level.

In summary, similar to the proposed project, the Reduced Project Alternative would result in no impacts to historical resources and less than significant impacts with mitigation incorporated for archaeological resources, and less than significant impacts on human remains after complying with regulatory standards. However, because the Reduced Project Alternative would require the installation of fewer geopiers, the Reduced Project Alternative would result in less impacts to unknown cultural resources compared to the proposed project.

5.5.4.3 Alternative 3: Commercial/Retail Alternative

Similar to the proposed project, the Commercial/Retail Alternative would not cause a substantial adverse change in the significance of a historical resource as defined by CEQA because no previously recorded historical resources were identified in the project site. The Commercial/Retail Alternative would develop the same project site with commercial/retail uses and would require ground-disturbing construction activities for the development. Similar to the proposed project, the Commercial/Retail Alternative would have a low likelihood of encountering intact buried archaeological deposits and previously discovered buried human remains during ground-disturbing construction activities; however, the Commercial/Retail Alternative would not require the installation of geopiers and, therefore, would be less likely to disturb archaeological resources and human remains. The Commercial/Retail Alternative would be required to incorporate mitigation measures to reduce potentially significant impacts to archaeological resources by requiring cultural resources awareness training prior to the commencement of ground-disturbing activities and the retention of a qualified professional archaeologist on an on-call basis during construction. The Commercial/Retail Alternative would also be required to comply with Health and Safety Code Section 7050.5, which would reduce potentially significant impacts to previously undiscovered buried human remains. Implementation of this mitigation and adherence to regulatory standards would reduce potential impacts related to cultural resources to a less than significant level.

In summary, similar to the proposed project, the Commercial/Retail Alternative would result in no impacts to historical resources, less than significant impacts with mitigation incorporated for archaeological resources, and less than significant impacts on human remains after complying with regulatory standards. However, because the Commercial/Retail Alternative would not require the



installation of geopiers, the Commercial/Retail Alternative would result in less impacts to unknown cultural resources compared to the proposed project.

5.5.5 Energy

Project construction would consume diesel fuel and gasoline. Additionally, project operation would increase electricity and natural gas demand. Although project construction and operation would require using energy, the proposed project would comply with including the Title 24 building energy efficiency standards. The proposed project would not result in the wasteful, inefficient, or unnecessary consumption of energy resources, or conflict with or obstruct a State or local plan for renewable energy or energy efficiency. Therefore, energy impacts would be less than significant, and no mitigation is required.

5.5.5.1 Alternative 1: No Project Alternative

The No Project Alternative would not require any grading or site work because no new development would occur on the project site. In addition, no buildings would be constructed on the project site. Therefore, the No Project Alternative would not increase energy demand on the project site. No energy impacts would occur; therefore, energy impacts of the No Project Alternative would be less than that of the proposed project.

5.5.5.2 Alternative 2: Reduced Project Alternative

The Reduced Project Alternative would develop the project site with a mixed-use development with the same commercial uses (e.g., hotel, retail, and restaurant uses) as the proposed project, but with a reduced residential component, no movie theater, and an increased retail component. A similar grading footprint but less construction would be required for the Reduced Project Alternative compared to the proposed project; therefore, energy use during construction would be less than the proposed project. Like the proposed project, the buildings construction as part of the Reduced Project Alternative would meet the Title 24 building energy efficiency standards. Like the proposed project, the Reduced Project Alternative would not result in the wasteful, inefficient, or unnecessary consumption of energy resources or conflict with or obstruct a state or local plan for renewable energy or energy efficiency; therefore, impacts related to energy use would be less than significant. However, because the Reduced Project Alternative includes less development than the proposed project, consumption of natural gas, electricity, and fuel during operation would be less than the proposed project. Therefore, energy impacts would be less than significant and less than the proposed project.

5.5.5.3 Alternative 3: Commercial/Retail Alternative

The Commercial/Retail Alternative would develop the project site with retail and restaurant uses. The same grading footprint would be required compared to the proposed project. However, the Commercial/Retail Alternative would require less building construction activities because the total building square footage would be approximately 320,000 sf less than the proposed project. Therefore, construction energy use would be less than the proposed project. In addition, the buildings constructed as part of the Commercial/Retail Alternative would meet the Title 24 building energy efficiency standards and would result in less electricity and natural gas demand compared to the proposed project. However, the Commercial/Retail Alternative would generate 1,225 more daily



vehicle trips than the proposed project and would therefore consume more fuel than the proposed project from vehicle trips during operation. Like the proposed project, the Commercial/Retail Alternative would not result in the wasteful, inefficient, or unnecessary consumption of energy resources or conflict with or obstruct a state or local plan for renewable energy or energy efficiency; therefore, impacts related to energy use would be less than significant. Although the Commercial/Retail Alternative would consume more fuel from vehicle trips during operation than the proposed project, the Commercial/Retail Alternative would consume less fuel and energy overall than the proposed project considering both vehicular and stationary source demands.

5.5.6 Geology and Soils

The proposed project would not result in any impacts related to rupture of a known earthquake fault, landslides, subsidence, and septic tanks and alternative wastewater disposal systems. Potential impacts related to landslides and unstable slopes, lateral spreading, and expansive soils would be less than significant, and no mitigation is required. Impacts related to strong seismic ground shaking, liquefaction, compressible/collapsible soils, and wet soils are considered potentially significant, and mitigation is required. Project construction would comply with the requirements of the California Building Code and the City's Building Code. In addition, the mitigation measures require compliance with the recommendations in the project's Geotechnical Assessment. With implementation of mitigation, the proposed buildings would be designed and constructed to current safety standards, and all potentially significant impacts related to soils and geology would be less than significant. Project construction would increase erosion and loss of topsoil during construction; however, Erosion Control Best Management Practices (BMPs) and Sediment Control BMPs would be implemented during construction in compliance with the requirements of the Construction General Permit to ensure that impacts related to erosion would be less than significant. Soils on the project site have a low paleontological sensitivity from the surface to a depth of 10 feet and high sensitivity below a depth of 10 feet; therefore, it is possible that deeper ground-disturbing construction activities such as construction of the geopiers could have a potentially significant impact on previously undiscovered paleontological resources. The mitigation measures require paleontological monitoring. In the event that paleontological resources are encountered during construction, construction activities shall be halted until the find can be assessed by a qualified paleontologist, who will make recommendations for the appropriate collection, treatment, and disposition of the discovery. These measures would reduce potentially significant impacts to paleontological resources to less than significant.

5.5.6.1 Alternative 1: No Project Alternative

The No Project Alternative would not require any grading or site work because no new development would occur on the project site. In addition, no buildings would be constructed on the project site. Therefore, the No Project Alternative would have no impacts related to geology and soils, and this alternative would have less geology and soils impacts than the proposed project.

5.5.6.2 Alternative 2: Reduced Project Alternative

The Reduced Project Alternative would develop the project site with a mixed-use development with the same commercial uses (e.g., hotel, retail, and restaurant uses) as the proposed project, but with a reduced residential component, no movie theater, and an increased retail component. The same



grading footprint and similar construction would be required compared to the proposed project. The required grading and construction activities would result in reduced impacts related to geology and soils as the proposed project because the Reduced Project Alternative would result in the installation of fewer geopiers. As with the proposed project, the Reduced Project Alternative would be designed and constructed to conform to the current seismic design provisions of the California Building Code and the City Building Code. In addition, this alternative would implement the same mitigation measure as the proposed project, which requires implementation of the measures contained in a final design-level geotechnical analysis and paleontological monitoring. Therefore, like the proposed project, the Reduced Project Alternative would have less than significant impacts related to geology and soils with implementation of mitigation. Given the similar footprint and reduced construction activities, the geology-related impacts of the Reduced Project Alternative would be less than that of the proposed project.

5.5.6.3 Alternative 3: Commercial/Retail Alternative

The Commercial/Retail Alternative would develop the project site with retail and restaurant uses. The same grading footprint would be required compared to the proposed project; however, the Commercial/Retail Alternative would not require the installation of geopiers. The required grading would result in reduced impacts related to geology and soils as the proposed project because the Commercial/Retail Alternative would result in a reduced scale of proposed structures and would not install geopiers. As with the proposed project, the Commercial/Retail Alternative would be designed and constructed to conform to the current seismic design provisions of the California Building Code and the City's Building Code. In addition, this alternative would implement the same mitigation measure as the proposed project, which requires implementation of the measures contained in a final design-level geotechnical analysis and paleontological monitoring. Therefore, like the proposed project, the Commercial/Retail Alternative would have less than significant impacts related to geology and soils with implementation of mitigation. Given the similar footprint and reduced construction activities of the Commercial/Retail Alternative, the geology-related impacts of the Commercial-Retail Alternative would be less than that of the proposed project.

5.5.7 Greenhouse Gas Emissions

The proposed project would be designed in compliance with adopted regulations aimed at reducing greenhouse gas emissions. Specifically, the project would meet the 2019 Building Energy Efficiency Standards (California Code of Regulations [CCR] Title 24). Although compliance with CCR Title 24 would help to reduce the proposed project's greenhouse gas emissions, the overall emissions attributable to construction and operation of the proposed project of 7,208 MT CO₂e/yr are expected to exceed the South Coast Air Quality Management District's (SCAQMD) thresholds of 3,000 MT CO₂e/yr. The greenhouse gas emissions of 7.9 metric tons of carbon dioxide equivalent per service population per year (MT CO₂e/SP/yr) would also exceed the SCAQMD's threshold of 4.3 MT CO₂e/SP/yr for 2022. Therefore, the proposed project would result in a significant unavoidable project impact and significantly contribute to an unavoidable cumulative impact related to greenhouse gas emissions and conflict with applicable greenhouse gas reduction plans, policies, or regulations. The proposed project includes mitigation measures that require (1) the project's retail commercial buildings, multi-family residential uses, hotel, and movie theater to be designed and built to be 10 percent more energy-efficient than 2019 Title 24 requirements or the current Title 24



requirement, whichever is more stringent, and (2) the implementation of a Transportation Demand Management (TDM) Program for on-site residents and workers to reduce vehicle miles traveled. However, because the type and extent of measures that would be feasible to be implemented would be dependent on the individual tenants that occupy the project, the total amount of greenhouse gas reductions cannot be quantified at this time. For example, the ability of a business to affect employee and patrons vehicle miles traveled would depend in part on the number of employees and patrons, where they live, and the availability of regional programs such as transit buses. Therefore, impacts related to generation of greenhouse gas emissions would remain significant and unavoidable.

5.5.7.1 Alternative 1: No Project Alternative

The No Project Alternative would not require any grading or site work because no new development would occur on the project site. In addition, no buildings would be constructed on the project site. Therefore, the No Project Alternative would not increase greenhouse gas emissions from new on-site uses or additional vehicle trips. No impacts related to greenhouse gas emissions would occur; therefore, greenhouse gas emission impacts of the No Project Alternative would be less than that of the proposed project.

5.5.7.2 Alternative 2: Reduced Project Alternative

The Reduced Project Alternative would develop the project site with a mixed-use development with the same commercial uses (e.g., hotel, retail, and restaurant uses) as the proposed project, but with a reduced residential component, no movie theater, and an increased retail component. A similar grading footprint but less construction would be required for the Reduced Project Alternative compared to the proposed project; therefore, greenhouse gas emission during construction would be less than the proposed project. Because the Reduced Project Alternative includes less development and would generate fewer vehicle trips than the proposed project, greenhouse gas emissions during operation would be less than the proposed project. The Reduced Project Alternative is estimated to generate 4,109 MT of CO₂e/yr, which is less than the proposed project. Similar to the proposed project, the Reduced Project Alternative's greenhouse gas emissions would exceed the SCAQMD's threshold of 3,000 MT CO₂e/yr. Therefore, the Reduced Project Alternative's emissions should be compared against the SCAQMD's efficiency-based threshold of 4.3 MT CO₂e/SP/yr. As described in Table 5.A below, the Reduced Project Alternative is estimated to have a service population of 383. Based on this service population estimate, the Reduced Project Alternative would generate approximately 10.7 MT of CO₂e/SP/yr, which is greater than the proposed project. Therefore, although the Reduced Project Alternative would result in less total greenhouse gas emissions than the proposed project, the Reduced Project Alternative would generate a greater amount of greenhouse gas emissions per capita than the proposed project and its impacts would be significant and unavoidable.



Table 5.A: Alternative 2 Service Population Estimate

Gross Building Area	Population/Employment Generation Factor	Estimated Employees
80 residential units	3.02 persons/household	242
120 room hotel (96,800 sf)	1500 gross sf/employee	65
41,600 sf of retail space	550 gross sf/employee	76
Total Service Population		383

Sources: U.S. Green Building Council. 2008. Building Area per Employee by Business Type; and United States Census Bureau. 2010. 2010 Census. Table DP-1 Profile of General Population and Housing Characteristics.

sf = square foot/feet

5.5.7.3 Alternative 3: Commercial/Retail Alternative

The Commercial/Retail Alternative would develop the project site with retail and restaurant uses. The same grading footprint would be required compared to the proposed project. However, the Commercial/Retail Alternative would require less building construction activities because the total building square footage would be approximately 320,000 sf less than the proposed project. Therefore, greenhouse gas emissions during construction would be less than the proposed project. The buildings constructed as part of the Commercial/Retail Alternative would generate similar greenhouse gas emissions compared to the proposed project during operation. However, the Commercial/Retail Alternative would generate 1,225 more daily vehicle trips than the proposed project and would therefore generate more greenhouse gas emissions during operation than the proposed project. According to the 2008 IS/MND, the Commercial/Retail Alternative is estimated to generate 6,866 MT of CO₂e/yr, which is slightly less than the proposed project; however, this estimate did not include an amortization of the Commercial/Retail Alternative’s construction emissions. Similar to the proposed project, the Commercial/Retail Alternative’s greenhouse gas emissions would exceed the SCAQMD’s threshold of 3,000 MT CO₂e/yr. Therefore, the Commercial/Retail Alternative’s emissions should be compared against the SCAQMD’s efficiency-based threshold of 4.3 MT CO₂e/SP/yr. As described in Table 5.B below, the Commercial/Retail Alternative is estimated to have a service population of 293. Based on this service population estimate, the Commercial/Retail Alternative would generate approximately 23.4 MT of CO₂e/SP/yr, which is substantially greater than the proposed project. Therefore, although the Commercial/Retail Alternative would result in less total greenhouse gas emissions than the proposed project, the Commercial/Retail Alternative would generate a greater amount of greenhouse gas emissions per capita than the proposed project, and its impacts related to greenhouse gas emissions would be significant and unavoidable.

Table 5.B: Alternative 3 Service Population Estimate

Gross Building Area	Gross square feet per employee	Estimated Employees
122,556 sf of major retail space	550	223
30,353 sf of other retail/quick-serve or sit-down restaurant space	435	70
Total Service Population		293

Source: U.S. Green Building Council. 2008. Building Area per Employee by Business Type.

sf = square foot/feet



5.5.8 Hazards and Hazardous Materials

The proposed project would result in no impacts related to physical interference with an adopted emergency response plan or related to risk of loss, injury, or death involving wildland fires. Impacts related to upset of hazardous materials, emission or handling of hazardous materials in the vicinity of a school, hazardous materials sites, and safety hazards within airport land use plans would be less than significant and no mitigation is required. Construction and operation activities on the project site would involve transport, use, and disposal of small quantities of hazardous materials or wastes. Adopted regulations and procedures are in place to minimize impacts related to use and disposal of household hazardous waste associated with project construction and operation. During construction, good housekeeping BMPs would be implemented to reduce risk of spills of hazardous materials. Conditions of approval specified by the Orange County Fire Authority (OCFA), which would review the project, would be applied to the proposed project to reduce operational hazardous material impacts and ensure that any hazardous waste that is generated on-site would be transported to an appropriate disposal facility by a licensed hauler in accordance with State and federal law. Additionally, the proposed project would comply with all appropriate Federal Aviation Administration (FAA) standards and requirements and the FAA would review the height of the proposed buildings to ensure that no aviation hazards would occur. Adherence to regulatory standards would ensure that impacts related to the transport, use, and disposal of hazardous materials would be less than significant, and no mitigation is required.

5.5.8.1 Alternative 1: No Project Alternative

The No Project Alternative would not require any grading or site work because no new development would occur on the project site. In addition, no buildings would be constructed on the project site. Because no construction activities would occur, no construction impacts related to hazardous materials would occur. The project site would remain a paved parking lot that would continue to be used for temporary uses, such as vehicle parking, Christmas tree lot, truck staging area, and auxiliary truck and trailer storage. Small amounts of hazardous materials may be used on the project site; however, the No Project Alternative would not increase the use of hazardous materials because the on-site use would remain the same. In addition, hazardous materials would be handled in accordance with State and federal law. The No Project Alternative would not require transport or handling of hazardous materials during construction and operational use of hazardous materials would continue to be limited due to the lack of development and temporary use of the project site. Therefore, no impacts related to hazardous materials would occur and impacts related to hazardous materials would be less than that of the proposed project.

5.5.8.2 Alternative 2: Reduced Project Alternative

The Reduced Project Alternative would develop the project site with a mixed-use development with the same commercial uses (e.g., hotel, retail, and restaurant uses) as the proposed project, but with a reduced residential component, no movie theater, and an increased retail component. The Reduced Project Alternative would involve demolition of the existing parking lot and construction of new buildings that would result in similar impacts related to hazardous waste and materials compared to the proposed project. Construction and operation activities on the project site would involve transport, use, and disposal of small quantities of hazardous materials or wastes. Adopted regulations and procedures are in place to minimize impacts related to use and disposal of



household hazardous waste associated with construction and operational activities. During construction, good housekeeping BMPs would be implemented to reduce risk of spills of hazardous materials. Conditions of approval specified by OCFA would be applied, similar to the proposed project, to reduce operational hazardous material impacts and ensure that any hazardous waste that is generated on-site would be transported to an appropriate disposal facility by a licensed hauler in accordance with State and federal law. The residential building height would be reduced compared to the proposed project which would reduce safety risks to aviation, although the tallest on-site structure would still be the five-story hotel. However, similar to the proposed project, the Reduced Project Alternative would comply with all appropriate FAA standards and requirements and the FAA would review the height of the proposed buildings to ensure that no aviation hazards would occur. Adherence to regulatory standards would ensure that impacts related to the transport, use, and disposal of hazardous materials would be less than significant and similar to that of the proposed project.

5.5.8.3 Alternative 3: Commercial/Retail Alternative

The Commercial/Retail Alternative would develop the project site with retail and restaurant uses. The Commercial/Retail Alternative would involve demolition of the existing parking lot and construction of new buildings that would result in similar impacts related to hazardous waste and materials compared to the proposed project. Construction and operation activities on the project site would involve transport, use, and disposal of small quantities of hazardous materials or wastes. Adopted regulations and procedures are in place to minimize impacts related to use and disposal of household hazardous waste associated with construction and operational activities. During construction, good housekeeping BMPs would be implemented to reduce risk of spills of hazardous materials. Conditions of approval specified by OCFA would be applied, similar to the proposed project, to reduce operational hazardous material impacts and ensure that any hazardous waste that is generated on-site would be transported to an appropriate disposal facility by a licensed hauler in accordance with State and federal law. The building heights (one-story) would be substantially reduced compared to the proposed project which would reduce safety risks to aviation. However, the Commercial/Retail Alternative would comply with all appropriate FAA standards and requirements and the FAA would review the height of the proposed buildings to ensure that no aviation hazards would occur. Adherence to regulatory standards would ensure that impacts related to the transport, use, and disposal of hazardous materials would be less than significant and similar to that of the proposed project.

5.5.9 Hydrology and Water Quality

Construction of the proposed project would disturb soil and increase erosion and the risk of spills which would increase the potential for pollutants to be transported via stormwater runoff into receiving waters. The proposed project would comply with the Construction General Permit and implement a Stormwater Pollution Prevention Plan (SWPPP) and best management practices (BMPs) during construction to address pollutants of concern and to ensure protection of beneficial uses of receiving waters. The proposed project would change the use of the project site and would therefore change the pollutants of concern in stormwater runoff. A comprehensive Water Quality Management Plan (WQMP) and BMPs would be implemented during operation to address pollutants of concern and to ensure protection of beneficial uses of receiving waters. The water



quality impacts of the proposed project would be less than significant upon compliance with existing plans, programs, and policies in place to ensure compliance with National Pollutant Discharge Elimination System (NPDES) regulations. No mitigation is required.

The proposed project would change on-site drainage patterns. Because the project site is currently 90 percent impervious, the proposed project would not increase impervious surface areas or increase stormwater runoff from the project site. The proposed project includes drainage infrastructure and detention system to minimize development impacts to the site hydrology and reduce peak discharges from the project site in compliance with City discharge requirements for the project site. The detention systems would greatly reduce the amount of flows that would reach the downstream stormdrain system compared to the existing condition. The proposed project would implement one of two scenarios to convey off-site runoff that exceeds the 0.3 cfs capacity of the Winners Circle stormdrain system to the curb and gutter in Katella Avenue. Under Scenario 1, flow that exceeds the 0.3 cfs capacity of the Winners Circle stormdrain system would be conveyed around the project site before discharging to the storm drain in Katella Avenue. Under Scenario 2, those flows would be conveyed through the project site before discharging to the storm drain in Katella Avenue.

Under Scenario 1, the off-site flows would temporarily pond along the project site's northern property line at variable depths, depending on the magnitude of the storm event (e.g., 2-year, 10-year, and 100-year storm) before discharging to the west, into Siboney Street, then flowing overland to the south into Katella Avenue. This ponding would last for a short duration, would not flood any structures, and would only affect the portions of the parking lot north of the project site that are farthest away from the Los Alamitos Race Course grandstand. Under Scenario 2, the proposed project would not result in any additional off-site ponding over existing conditions. The hydrology impacts of the proposed project would be less than significant upon compliance with existing City requirements. No mitigation is required.

Groundwater dewatering during construction would be localized and temporary, and the volume of groundwater removed would not be substantial. Project operation would not require groundwater extraction and would not substantially change infiltration. The groundwater impacts of the proposed project would be less than significant, and no mitigation is required.

The proposed project would result in no impacts related to flood hazards, inundation, increases in impervious surface area, environmentally sensitive areas, or aquatic, wetland, or riparian habitat and no mitigation is required.

5.5.9.1 Alternative 1: No Project Alternative

The No Project Alternative would not require any grading or site work because no new development would occur on the project site. Therefore, no soil disturbance would occur under this alternative and there would be no construction impacts on water quality. The No Project Alternative would not change impervious surface areas, add new uses or structures, or change stormwater runoff on the project site compared to existing conditions. However, no operational BMPs would be implemented and site runoff would continue to be untreated. In addition, no drainage infrastructure or detention systems would be implemented. Therefore, the peak flow from the site would continue to



contribute to the exceedance of the capacity of the downstream stormdrain systems. Although the No Project Alternative would have no hydrology and water quality impacts compared to existing conditions, this alternative would have greater hydrology and water quality impacts than the proposed project because it would not include implementation of BMPs, drainage infrastructure, or detention systems.

5.5.9.2 Alternative 2: Reduced Project Alternative

The Reduced Project Alternative would develop the project site with a mixed-use development with the same commercial uses (e.g., hotel, retail, and restaurant uses) as the proposed project, but with a reduced residential component, no movie theater, and an increased retail component. Because the Reduced Project Alternative would be constructed on the same project site as the proposed project, the same soil disturbance would occur during construction. In addition, the impervious surface area on the project site would be similar to the proposed project. Also similar to the proposed project, the implementation of BMPs during the construction and operation phases would ensure that this alternative would not generate significant water quality impacts. The Reduced Project Alternative would also be required to implement drainage infrastructure and detention systems to reduce peak flow from the peak discharges from the project site in compliance with City discharge requirements for the project site. Similar to the proposed project, the Reduced Project Alternative would implement one of two scenarios to convey off-site runoff that exceeds the 0.3 cfs capacity of the Winners Circle stormdrain system to the curb and gutter in Katella Avenue. If the Reduced Project Alternative would implement Scenario 1 for addressing off-site flows, it would also result in the same short-term off-site ponding during storm events as the proposed project. The Reduced Project Alternative would have less than significant impacts on hydrology and water quality, and this alternative would have similar impacts to those associated with the proposed project.

5.5.9.3 Alternative 3: Commercial/Retail Alternative

The Commercial/Retail Alternative would develop the project site with retail and restaurant uses. Because the Commercial/Retail Alternative would be constructed on the same project site as the proposed project, the same soil disturbance would occur during construction. In addition, the impervious surface area on the project site would be similar to the proposed project. Also similar to the proposed project, the implementation of BMPs during the construction and operation phases would ensure that this alternative would not generate significant water quality impacts. The Commercial/Retail Alternative would also be required to implement drainage infrastructure and detention systems to reduce peak flow from the reduce peak discharges from the project site in compliance with City discharge requirements for the project site. Similar to the proposed project, the Commercial/Retail Alternative would implement one of two scenarios to convey off-site runoff that exceeds the 0.3 cfs capacity of the Winners Circle stormdrain system to the curb and gutter in Katella Avenue. If the Commercial/Retail Alternative would implement Scenario 1 for addressing off-site flows, it would also result in the same short-term off-site ponding during storm events as the proposed project. The Commercial/Retail Alternative would have less than significant impacts on hydrology and water quality, and this alternative would have similar impacts to those associated with the proposed project.



5.5.10 Land Use and Planning

The proposed project would not divide an existing community. The Cypress General Plan Land Use Policy Map designates the project site as “Specific Plan Area” in recognition that the project site is subject to the Amended Cypress Business and Professional Center Specific Plan (Specific Plan). The Specific Plan land use designation for the project site is Professional Office, which is intended to accommodate the development of professional and administrative offices that complement the adjacent hotel center within the Specific Plan area. The project site currently has a zoning designation of PBP-25A, Planned Business Park (PBP), which is intended to provide for the development of educational, professional office, commercial, industrial, open space, or any public or semi-public uses. The proposed project would require a Specific Plan Amendment to modify the land use designation of the project site from Professional Office to a newly created mixed-use land use district that would allow residential and hotel uses, while still permitting commercial/retail uses. Upon the approval of the Specific Plan Amendment, the proposed project would be consistent with the land use designations contained in the Specific Plan.

The proposed project would develop a currently underutilized project site to provide additional housing opportunities in a region that is currently experiencing a severe housing shortage. Additionally, new housing units in an area of surrounded by business parks would improve the region’s economic competitiveness by ensuring that area workers would have access to new housing in close proximity to their jobs. The proposed project would provide safe and attractive pedestrian connections to surrounding land uses and would facilitate transit use and active transportation by providing a new dense, mixed-use development along a major arterial street (Katella Avenue), which is already served by existing transit service. For these reasons, the proposed project would be consistent with the goals and policies of the 2016–2040 RTP/SCS, the City’s General Plan, and the Specific Plan. Therefore, the proposed project would result in less than significant impacts related to potential conflicts with applicable land use plans, policies, and regulations, and no mitigation is required.

5.5.10.1 Alternative 1: No Project Alternative

No development would occur on the project site under the No Project Alternative. The project site would remain a paved parking lot. The No Project Alternative would not be consistent with the Specific Plan land use designation of Professional Office or the zoning designation of PBP-25A, Planned Business Park (PBP). Additionally, the No Project Alternative would not be consistent with the City’s goals or the Specific Plan, which envisions buildout of the Specific Plan area with business park, professional office, and support commercial, and retail/commercial uses. Therefore, impacts to land use would be greater than the proposed project.

5.5.10.2 Alternative 2: Reduced Project Alternative

The Reduced Project Alternative would develop the project site with a mixed-use development with the same commercial uses (e.g., hotel, retail, and restaurant uses) as the proposed project, but with a reduced residential component, no movie theater, and an increased retail component. Like the proposed project, the Reduced Project Alternative would not divide an existing community. Like the proposed project, the Reduced Project Alternative would require a Specific Plan Amendment to modify the land use designation of the project site from Professional Office to a newly created



mixed-use land use district that would allow residential uses, while still permitting commercial/retail uses. Upon the approval of the Specific Plan Amendment, the proposed project would be consistent with the land use designations contained in the Specific Plan. The Reduced Project Alternative includes similar uses as the proposed project, but with reduced residential uses and no movie theater. Because of the similar proposed uses, the Reduced Project Alternative would be consistent with the goals and policies of the 2016–2040 RTP/SCS, the City’s General Plan, and the Specific Plan, as amended, for the same reasons as the proposed project. Therefore, the Reduced Project Alternative would result in less than significant impacts related to potential conflicts with applicable land use plans, policies, and regulations. Land use impacts of the Reduced Project Alternative would be similar to the proposed project.

5.5.10.3 Alternative 3: Commercial/Retail Alternative

The Commercial/Retail Alternative would develop the project site with retail and restaurant uses. Like the proposed project, the Commercial/Retail Alternative would not divide an existing community. The project site is within an area designated as Professional Office, which permits the development of shopping centers of not less 10 acres in gross land area subject to a conditional use permit. Therefore, the Commercial/Retail Alternative is consistent with allowable uses designated in the existing Specific Plan. The Commercial/Retail Alternative is consistent with the goals, objectives, and policies of the Specific Plan because it would diversify the types of uses in the Cypress Business Park by including retail and restaurant uses, which would also provide additional employment opportunities and increase the fiscal benefits to the City by generating additional revenues and sales tax. Therefore, the Reduced Project Alternative would result in less than significant impacts related to potential conflicts with applicable land use plans, policies, and regulations. Land use impacts of the Commercial/Retail Alternative would be similar to the proposed project, except that it would not require a Specific Plan Amendment.

5.5.11 Noise

The construction noise, construction vibration, or off-site operational traffic noise levels would not exceed City noise level standards or the Federal Transit Administration (FTA) community annoyance threshold for vibration. Although project construction would not exceed applicable thresholds, the project includes mitigation to further minimize construction-related vibration. The construction contractor would be required to demonstrate to the City that construction noise reduction measures are being implemented to reduce construction noise. Operation of the proposed project would require the use of rooftop heating, ventilation, and air conditioning (HVAC) units for the proposed buildings. Noise generated from HVAC units could impact sensitive receptors within the vicinity of the project site by exceeding the City’s daytime and nighttime exterior noise standard. Therefore, the proposed project includes mitigation which requires the Applicant/Developer to demonstrate to the City that on-site stationary noise sources comply with City noise standards. Therefore, noise and vibration impacts would be less than significant with implementation of mitigation. Additionally, aircraft noise generated from the two closest airports would not expose people residing or working on the project site to excessive noise levels due to the proximity of a public airport. Airport noise impacts would be less than significant.



5.5.11.1 Alternative 1: No Project Alternative

The No Project Alternative would not involve any grading, construction, vehicle, or truck trips. Therefore, the noise impacts that are typically associated with grading and construction would not occur under this alternative. Because no development would be constructed under the No Project Alternative and vehicle trips would not increase, there would be no increase in noise levels. Therefore, the No Project Alternative would have no noise impacts, and this alternative would have less noise impacts than the proposed project.

5.5.11.2 Alternative 2: Reduced Project Alternative

The Reduced Project Alternative would involve a grading footprint and construction activities similar to the proposed project; however, the Reduced Project Alternative would require the installation of fewer geopiers. Therefore, this alternative would result in less construction noise impacts associated with grading and construction than the proposed project. In addition, the construction period may be a shorter duration due to the decreased density. The Reduced Project Alternative would be expected to implement the same mitigation as the proposed project. As such, the construction contractor would be required to demonstrate to the City that construction noise reduction measures are being implemented to reduce construction noise. Construction noise impacts would be less than significant with mitigation and less than the proposed project.

Under this alternative, and like the proposed project, operational noise would include vehicular noise associated with traffic related to the occupancy and operation of the new housing and commercial uses. However, because fewer residential units and no movie theater would be constructed under the Reduced Project Alternative, these operational noise levels would be reduced. Although this reduction in operational noise levels would be partially offset by the increase in retail space, the Reduced Project Alternative would result in a net reduction in operational noise levels. Additionally, the Reduced Project Alternative would have fewer vehicle trips than the proposed project. Therefore, operational noise associated with vehicle trips would be reduced. The Reduced Project Alternative would also include HVAC units on the buildings, which could impact sensitive receptors within the vicinity of the project site by exceeding the City's daytime and nighttime exterior noise standard. The Reduced Project Alternative would be expected to include similar mitigation as the proposed project, which requires the Applicant/Developer to demonstrate to the City that on-site stationary noise sources comply with City noise standards. Therefore, the Reduced Project Alternative would have less than significant noise impacts with implementation of mitigation, and this alternative would have less impacts than the proposed project.

5.5.11.3 Alternative 3: Commercial/Retail Alternative

The Commercial/Retail Alternative would involve a grading similar to the proposed project. However, the Commercial/Retail Alternative would require less building construction activities because the total building square footage would be approximately 320,000 sf less than the proposed project and this alternative would not require the installation of geopiers. The level of noise generated during construction would be less than the proposed project and would occur for a shorter period of time. The Commercial/Retail Alternative would be expected to implement the same mitigation as the proposed project. As such, the construction contractor would be required to demonstrate to the City that construction noise reduction measures are being implemented to



reduce construction noise. Construction noise impacts would be less than significant with mitigation and less than the proposed project.

Under this alternative, operational noise would include vehicular noise associated with traffic related to the occupancy and operation of the commercial/retail uses. However, the Commercial/Retail Alternative would have more vehicle trips than the proposed project. Additionally, due to the increased commercial/retail uses, this alternative would require more truck deliveries compared to the proposed project. Therefore, operational noise associated with vehicle and truck trips would be greater than the proposed project. The Commercial/Retail Alternative would also include HVAC units on the buildings, which could impact sensitive receptors within the vicinity of the project site by exceeding the City's daytime and nighttime exterior noise standard. The Commercial/Retail Alternative would be expected to include similar mitigation as the proposed project, which requires the Applicant/Developer to demonstrate to the City that on-site stationary noise sources comply with City noise standards. Therefore, the Commercial/Retail Alternative would have less than significant noise impacts with implementation of mitigation, and this alternative would have greater operational impacts than the proposed project.

5.5.12 Population and Housing

The project site is currently a paved parking lot; therefore, the proposed project would not displace any existing housing or populations on the project site. The proposed project includes the development of 251 apartment units, which is estimated to generate approximately 758 new residents. The addition of 758 new residents represents an increase of approximately 1.5 percent over the City's existing population of 49,833 as of January 2019.

Based on the 2016–2040 RTP/SCS Growth Forecast, SCAG projects that the City of Cypress' population will increase by 1,200 from 2012 to 2040 and that the number of households will increase by 600 from 2012 to 2040. Because housing was not envisioned on the project site, the proposed project would increase the Cypress population by approximately 758 net new residents and the amount of housing units by 251 new dwelling units not specifically assumed in the 2016 SCAG projections. The estimated increase in population from the proposed project accounts for 63.2 percent of the City's projected population growth from 2012 to 2040 and 41.8 percent of the City's projected household growth from 2012 to 2040.

SCAG recently updated its growth forecasts as part of the Draft 2020–2045 RTP/SCS, which indicates that the City's population is projected to grow more rapidly between 2016 and 2045 than previously forecast. Based on the Draft 2016–2040 RTP/SCS Growth Forecast, the population increase of 758 residents as a result of the proposed project would be within the updated SCAG population projections.

Additionally, according to SCAG's Draft Regional Housing Needs Assessment (RHNA) Methodology Estimate Tool for the planning period of October 2021 through October 2029, the City of Cypress has a total estimated RHNA of 3,967 units (1,159 Very Low-Income, 662 Low-Income, 629 Moderate-Income, and 1,518 above moderate-income units). Therefore, the total RHNA for the City of Cypress would be much larger than the projected housing growth included in the Draft 2020–2045 RTP/SCS growth forecasts that indicate that the City's housing is projected to grow by 800 units from 2016 to



2045. The housing units included in the proposed project would help the City meet the need for above moderate-income units included in the 6th cycle RHNA allocation. Because there is a need for additional housing over SCAG projections because the City is required by State law (Government Code Section 65580 et seq.) to plan for its fair share of projected housing construction needs in the City, the population growth as a result of the proposed project would not constitute substantial unplanned population growth in the area. Therefore, the proposed project's direct impact on population growth would be less than significant, and no mitigation is required.

5.5.12.1 Alternative 1: No Project Alternative

No development would occur on the project site under the No Project Alternative. The project site would remain a paved parking lot and no housing or populations would be displaced. The No Project Alternative would not include housing and would not increase the population in the City, so it would not induce substantial population growth. In comparison, the proposed project would result in a direct, though not substantial, increase in population within the project area. Therefore, the No Project Alternative would have less impact than the proposed project. However, unlike the proposed project, the No Project Alternative would not help the City meet the need for above moderate-income units included in its RHNA allocation.

5.5.12.2 Alternative 2: Reduced Project Alternative

The Reduced Project Alternative would develop the project site with a mixed-use development with the same commercial uses (e.g., hotel, retail, and restaurant uses) as the proposed project, but with a reduced residential component, no movie theater, and an increased retail component. The Reduced Project Alternative would include 80 residential units, which would generate approximately 242 new residents. The 242 new residents represent a 0.49 percent increase over the City's existing population as of January 2019.

Because housing was not envisioned on the project site, the Reduced Project Alternative would increase the Cypress population by approximately 242 net new residents and the amount of housing units by 80 new dwelling units not specifically assumed in the 2016 SCAG projections. The estimated increase in population from the Reduced Project Alternative would account for 20.2 percent of the City's projected population growth from 2012 to 2040 and 13.3 percent of the City's projected household growth from 2012 to 2040. Based on the Draft 2016–2040 RTP/SCS Growth Forecast, the population increase of 242 residents as a result of the Reduced Project Alternative would be within the updated SCAG population projections.

Additionally, the housing units included in the Reduced Project Alternative would help the City meet the need for above moderate-income units included in the City's RHNA allocation. However, as compared to the proposed project, the Reduced Project Alternative provides less housing to help the City meet the need for above moderate-income units included in the RHNA allocation. Because there is a need for additional housing over SCAG projections because the City is required by State law to plan for its fair share of projected housing construction needs in the City, the population growth as a result of the Reduced Project Alternative would not constitute substantial unplanned population growth in the area. Therefore, like the proposed project, the Reduced Project Alternative direct impact on population growth would be less than significant. However, because the Reduced Project Alternative would include less housing than the proposed project, and would therefore



result in less population growth, impacts would be less than the proposed project. However, compared to the proposed project, the Reduced Project Alternative would result in fewer residential units and would therefore contribute less to helping the City meet its need for above moderate-income units included in its RHNA allocation.

5.5.12.3 Alternative 3: Commercial/Retail Alternative

The Commercial/Retail Alternative would develop the project site with retail and restaurant uses. The project site is currently a paved parking lot; therefore, the Commercial/Retail Alternative would not displace any existing housing or populations on the project site. The Commercial/Retail Alternative would not include housing and would not increase the population in the City, so it would not induce substantial population growth. In comparison, the proposed project would result in a direct, though not substantial, increase in population within the project area. Therefore, the Commercial/Retail Alternative would have less impact than the proposed project. However, unlike the proposed project, the Commercial/Retail Alternative would not help the City meet the need for above moderate-income units included in the RHNA allocation.

5.5.13 Public Services

The proposed project would incrementally increase demand for fire protection and emergency service calls, which would result in a potentially significant impact. However, the Applicant/Developer would be required to enter into a Secured Fire Protection Agreement with the OCFA to ensure adequate fire protection service are available for the project site, which would reduce operational impacts to less than significant. The proposed project may incrementally contribute to the need for one additional police officer to meet future demand, but would not necessitate the expansion of the City's existing police facilities. Therefore, impacts related to police protection services would be less than significant. The proposed project's 251 residential units could generate approximately 126 elementary school students and 50 middle/high school students, which would increase the demand for school services. However, the Applicant/Developer would be required to pay school fees to reduce any impacts on school services. With payment of the required fees, impacts to schools would be less than significant. The proposed project's additional residents would require 2.27 acres of parkland based on the standard of 3.0 acres for each 1,000 residents in City's Municipal Code Section 25-43. Per City requirements, the Applicant/Developer would be required to pay fees and/or dedicate parkland. With the payment of in-lieu park fees and/or the dedication of parkland, impacts related to parks would be less than significant. Finally, the Cypress Branch Library has sufficient capacity to accommodate the additional population growth associated with the proposed project and library impacts would be less than significant. In conclusion, with implementation of the mitigation described above for fire service impacts, impacts to public services would be less than significant.

5.5.13.1 Alternative 1: No Project Alternative

No development would occur on the project site under the No Project Alternative. The No Project Alternative would not result in an increase in demand for fire protection and emergency services or police protection services because no new housing or commercial uses would be developed on the project site. In addition, the No Project Alternative would not increase the demand for parks, libraries, school, or other public facilities because there would be no new residents on the project



site. Therefore, the No Project Alternative would have no impacts on public services, and this alternative would have less impacts than the proposed project.

5.5.13.2 Alternative 2: Reduced Project Alternative

The Reduced Project Alternative would develop the project site with a mixed-use development with the same commercial uses (e.g., hotel, retail, and restaurant uses) as the proposed project, but with a reduced residential component, no movie theater, and an increased retail component. Compared to the proposed project, the Reduced Project Alternative, the demand for fire protection and emergency services and police protection services would decrease because fewer residential units and no movie theater would be developed on the project site. This reduction would be partially offset by the increase in retail space; however, the Reduced Project Alternative would result in a net reduction in the demand for fire protection, emergency services, and police protection services. Like the proposed project, the Applicant/Developer would be required to enter into a Secured Fire Protection Agreement with the OCFD to ensure adequate fire protection services are available for the project site. In addition, the Reduced Project Alternative would decrease the demand for parks, libraries, schools, and other public facilities because there would be fewer residents on the project site. Like the proposed project, the Applicant/Developer would be required to pay school fees and pay in-lieu park fees and/or or dedicate parkland to reduce any impacts on schools and parks. Therefore, the Reduced Project Alternative would have less than significant impacts on public services, and this alternative would have less impacts than the proposed project.

5.5.13.3 Alternative 3: Commercial/Retail Alternative

The Commercial/Retail Alternative would develop the project site with retail and restaurant uses. The new commercial/retail uses on the project site would incrementally increase demand for police, fire, and emergency medical services. Although the Commercial/Retail Alternative would not increase the population within the City, it would attract employees and customers to the project site. The increase in demand for fire and police services would be similar to the proposed project and would be less than significant. In addition, because the Commercial/Retail Alternative would not increase population within the City, this alternative would not increase demand for library, park, or school services. Therefore, impacts to public services would be less than significant and less than the proposed project.

5.5.14 Recreation

The proposed project includes the construction of a 251-unit apartment structure that would add 758 new residents. The proposed project would include a public open space/recreational amenities, including a plaza, two greenbelts, and a dog park, all of which would be available to the public. The proposed project's additional residents would require 2.27 acres of parkland based on the standard of 3.0 acres for each 1,000 residents in City's Municipal Code Section 25-43. Per City requirements, the Applicant/Developer would be required to pay fees and/or dedicate parkland. With the payment of in-lieu park fees and/or the dedication of parkland, impacts related to recreation would be less than significant and no mitigation is required.



5.5.14.1 Alternative 1: No Project Alternative

The No Project Alternative would not require any grading or site work because no new development would occur on the project site. In addition, no buildings would be constructed on the project site. Because no residential uses would be construction on the project site, the No Project Alternative would not increase demand for City parkland. No impacts to recreational facilities would occur and impacts would be less than the proposed project.

5.5.14.2 Alternative 2: Reduced Project Alternative

The Reduced Project Alternative would develop the project site with a mixed-use development with the same commercial uses (e.g., hotel, retail, and restaurant uses) as the proposed project, but with a reduced residential component, no movie theater, and an increased retail component. The Reduced Project Alternative would include 80 residential units, which would serve 242 residents, based on the average household size in the City of 3.02 persons per household. The 242 additional residents would require 0.73 acres of parkland based on the standard of 3.0 acres for each 1,000 residents in City's Municipal Code Section 25-43. Per City requirements, the Applicant/Developer would be required to pay fees and/or dedicate parkland. With the payment of in-lieu park fees and/or the dedication of parkland, impacts related to recreation would be less than significant. Because the Reduced Project Alternative would result in less residents than the proposed project, the increased use and impacts to parks and recreational facilities would also be less than the proposed project.

5.5.14.3 Alternative 3: Commercial/Retail Alternative

The Commercial/Retail Alternative would develop the project site with retail and restaurant uses. The Commercial/Retail Alternative would not include housing and would not increase the population in the City. Employees would be reasonably expected to use parks near their homes; therefore, the Commercial/Retail Alternative would not substantially increase the use of existing parks in the vicinity of the project site. The Commercial/Retail Alternative would, therefore, result in less than significant impacts to existing neighborhood and regional parks and recreational facilities. Because the Commercial/Retail Alternative would not increase the population in City and would not increase use of parks and recreational facilities, impacts to park and recreational facilities would be less than that of the proposed project. However, the Commercial/Retail Alternative would also not include publicly-available open space/recreational amenities, including a plaza, two greenbelts, and a dog park.

5.5.15 Transportation

The proposed project would develop the project site with a mixed-use development that would include commercial uses (e.g., movie theater, retail, hotel, and restaurant uses) and residential uses. The new uses on the project site have the potential to generate approximately 4,978 ADT, including 164 trips (68 inbound and 96 outbound) in the a.m. peak hour and 323 trips (176 inbound and 147 outbound) in the p.m. peak hour. With the addition of the project, all study area intersections would continue to operate at satisfactory LOS during both peak hours. The proposed project would not conflict with the *Orange County Congestion Management Program (CMP)*, City's General Plan Circulation Element, or the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy. Impacts related to conflict with a program, plan, ordinance, or policy addressing the



circulation system, including transit, roadway, bicycle, and pedestrian facilities would be less than significant. The project does not include any land uses that would be incompatible with surrounding land uses and would generate a similar vehicle mix to other surrounding land uses, consisting primarily of single-occupancy vehicles and distribution trucks. In addition, all new driveways at the project site would be subject to the provisions of the City of Cypress design standards to alleviate design feature and safety hazards. Therefore, impacts related to hazards due to a geometric feature or incompatible uses and inadequate emergency access would be less than significant and no mitigation is required.

5.5.15.1 Alternative 1: No Project Alternative

The No Project Alternative would not require any grading or site work because no new development would occur on the project site. In addition, no buildings would be constructed on the project site and the project site would remain a parking lot. The No Project Alternative would not increase vehicle trips to and from the project site. Therefore, no traffic impacts would occur and the No Project Alternative's impacts would be less than the proposed project.

5.5.15.2 Alternative 2: Reduced Project Alternative

The Reduced Project Alternative would develop the project site with a mixed-use development with the same commercial uses (e.g., hotel, retail, and restaurant uses) as the proposed project, but with a reduced residential component, no movie theater, and an increased retail component. The Reduced Project Alternative would result in less of an increase in vehicle trips to and from the project site because of the reduced residential uses and no movie theater. The expanded retail component would also generate fewer vehicle trips than a 10-screen movie theater. Like the proposed project, all study area intersections would continue to operate at satisfactory LOS during both peak hours under the Reduced Project Alternative. The Reduced Project Alternative would not conflict with the *Orange County Congestion Management Program (CMP)*, City's General Plan Circulation Element, or the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy. Impacts related to conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities would be less than significant. The Reduced Project Alternative would not include any land uses that would be incompatible with surrounding land uses and would generate a similar vehicle mix to other surrounding land uses, consisting primarily of single-occupancy vehicles and distribution trucks. In addition, all new driveways would be subject to the provisions of the City of Cypress design standards to alleviate design feature and safety hazards. Therefore, impacts related to hazards due to a geometric feature or incompatible uses and inadequate emergency access would be less than significant and no mitigation is required. Because the Reduced Project Alternative would result in less vehicle trips compared to the proposed project, traffic impacts would be less than the proposed project.

5.5.15.3 Alternative 3: Commercial/Retail Alternative

The Commercial/Retail Alternative would develop the project site with retail and restaurant uses. The Commercial/Retail Alternative would generate 1,225 more daily vehicle trips than the proposed project. Although the Commercial/Retail Alternative would result in more vehicle trips than the proposed project, all study area intersections would continue to operate at satisfactory LOS during



both peak hours. The Commercial/Retail Alternative would not conflict with the *Orange County Congestion Management Program (CMP)*, City's General Plan Circulation Element, or the 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy. Impacts related to conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities would be less than significant. The Commercial/Retail Alternative would not include any land uses that would be incompatible with surrounding land uses and would generate a similar vehicle mix to other surrounding land uses, consisting primarily of single-occupancy vehicles and distribution trucks. In addition, all new driveways would be subject to the provisions of the City of Cypress design standards to alleviate design feature and safety hazards. Therefore, impacts related to hazards due to a geometric feature or incompatible uses and inadequate emergency access would be less than significant and no mitigation is required. Because the Commercial/Retail Alternative would result in more vehicle trips compared to the proposed project, traffic impacts would be greater than the proposed project.

5.5.16 Tribal Cultural Resources

The proposed project would develop the project site, which would require ground-disturbing construction activities. No previously recorded cultural resources were identified in the project site, and no specific information regarding tribal cultural resources was received during the Native American consultation. Therefore, the proposed project would not cause a substantial adverse change in the significance of a tribal cultural resource as defined by CEQA that is listed or eligible for listing in the California Register of Historical Resources (California Register) or a local register. Based on the results of Native American consultation with the Gabrieleno Band of Mission Indians – Kizh Nation, there is potential that ground-disturbing construction activities would impact previously undiscovered significant tribal cultural resources. The proposed project would incorporate a mitigation measure to reduce potentially significant impacts to previously undiscovered significant tribal cultural resources through Native American monitoring and evaluation of archaeological resources by the Native American monitor, and reduce potentially significant impacts to Native American buried human remains through compliance with Health and Safety Code Section 7050.5. The mitigation measures would reduce potential impacts to a less than significant level.

5.5.16.1 Alternative 1: No Project Alternative

The No Project Alternative would not require any grading, site work, or removal of vegetation because no new development would occur on the project site. In addition, no buildings would be constructed on the project site. Therefore, the No Project Alternative would not cause a substantial adverse change in the significance of a tribal cultural resource as defined by CEQA that is listed or eligible for listing in the California Register or a local register. Further, the No Project Alternative would not have the potential to disrupt human remains or result in the discovery of previously unknown tribal cultural resources. No impacts related to tribal cultural resources would occur; therefore, the impacts of the No Project Alternative would be less than that of the proposed project.

5.5.16.2 Alternative 2: Reduced Project Alternative

The Reduced Project Alternative would develop the project site with a mixed-use development with the same commercial uses (e.g., hotel, retail, and restaurant uses) as the proposed project, but with a reduced residential component, no movie theater, and an increased retail component. Similar to



the proposed project, the Reduced Project Alternative would require ground-disturbing construction activities during the development; however, this alternative would require the installation of fewer geopiers. Similar to the proposed project, the Reduced Project Alternative would not cause a substantial adverse change in the significance of a tribal cultural resource as defined by CEQA that is listed or eligible for listing in the California Register or a local register because no previously recorded cultural resources were identified in the project site during the records search or during the Native American consultation. Based on the results of the Native American consultation, there is potential that ground-disturbing construction activities would impact previously undiscovered significant tribal cultural resources. The Reduced Project Alternative would be required to incorporate the same mitigation measure as the proposed project that requires Native American monitoring and evaluation of archaeological resources by the Native American monitor, and would also be required to comply with Health and Safety Code Section 7050.5. Implementation of mitigation and adherence to regulatory standards would reduce potential impacts related to tribal cultural resources to a less than significant level.

In summary, the Reduced Project Alternative would result in no impacts to tribal cultural resources that are listed or eligible for listing in the California Register or a local register, and less than significant impacts with mitigation incorporated for previously undiscovered significant tribal cultural resources and Native American human remains. The Reduced Project Alternative would result in less impacts to unknown tribal cultural resources compared to the proposed project because it would require the installation of fewer geopiers.

5.5.16.3 Alternative 3: Commercial/Retail Alternative

The Commercial/Retail Alternative would develop the project site with retail and restaurant uses. Similar to the proposed project, the Commercial/Retail Alternative would require ground-disturbing construction activities during development; however, this alternative would not require the installation of geopiers. Similar to the proposed project, the Commercial/Retail Alternative would not cause a substantial adverse change in the significance of a tribal cultural resource as defined by CEQA that is listed or eligible for listing in the California Register or a local register because no previously recorded cultural resources were identified in the project site during the records search or during the Native American consultation. Based on the results of the Native American consultation, there is potential that ground-disturbing construction activities would impact previously undiscovered significant tribal cultural resources. The Commercial/Retail Alternative would be required to incorporate the same mitigation measure as the proposed project that requires Native American monitoring and evaluation of archaeological resources by the Native American monitor, and would also be required to comply with Health and Safety Code Section 7050.5. Implementation of mitigation and adherence to regulatory standards would reduce potential impacts related to tribal cultural resources to a less than significant level.

In summary, the Commercial/Retail Alternative would result in no impacts to tribal cultural resources that are listed or eligible for listing in the California Register or a local register, and less than significant impacts with mitigation incorporated for previously undiscovered significant tribal cultural resources and Native American human remains. The Commercial/Retail Alternative would result in less impacts to unknown tribal cultural resources compared to the proposed project because it would not require the installation of geopiers.



5.5.17 Utilities and Service Systems

Utilities and service systems include water, wastewater, electricity, natural gas, telecommunication, solid waste, and storm drain facilities. The proposed project would include on-site water distribution, wastewater conveyance, stormdrain systems, electrical lines, natural gas lines, and telecommunication lines that would connect to the existing utility systems in the City. The proposed project would increase demand for these services as well as solid waste disposal and wastewater treatment; however, there is sufficient supplies and capacity available to service the increased demand. Impacts related to utilities and service systems would be less than significant and no mitigation is required.

5.5.17.1 Alternative 1: No Project Alternative

The No Project Alternative would not include any new development on the project site so it would not increase demand for or require any enhancement or new construction of public facility infrastructure for electricity, natural gas, water, or telecommunications. Additionally because no construction would occur and there would be no residential or commercial uses added to the site, no increase in solid waste or wastewater generation would occur. Therefore, the No Project Alternative would have no impacts on utilities and service systems, and this alternative would have less impacts than the proposed project.

5.5.17.2 Alternative 2: Reduced Project Alternative

The Reduced Project Alternative would develop the project site with a mixed-use development with the same commercial uses (e.g., hotel, retail, and restaurant uses) as the proposed project, but with a reduced residential component, no movie theater, and an increased retail component. Compared to the proposed project, the Reduced Project Alternative would result in less demand for electricity, natural gas, water, or telecommunications because of the reduced residential and hotel uses on the project site. Additionally, the Reduced Project Alternative would generate less solid waste and wastewater. Although the reduction in demand for electricity, natural gas, water, and telecommunications and generation of less solid waste and wastewater would be partially offset by the increase in retail space, the Reduced Project Alternative would result in a net reduction in demand for electricity, natural gas, water, and telecommunications and less generation of solid waste and wastewater compared to the proposed project. Therefore, the Reduced Project Alternative would have less than significant impacts on utilities. This alternative would have less impacts related to utilities and service systems than the proposed project.

5.5.17.3 Alternative 3: Commercial/Retail Alternative

The Commercial/Retail Alternative would develop the project site with retail and restaurant uses. Compared to the proposed project, the Commercial/Retail Alternative would result in less demand for electricity, natural gas, water, or telecommunications because this alternative would not include residential uses, which typically have a higher utility demand than retail/commercial uses. Additionally, the Commercial/Retail Alternative would generate less solid waste and wastewater. Therefore, the Commercial/Retail Alternative would have less than significant impacts on utilities. This alternative would have less impacts related to utilities and service systems than the proposed project.



5.5.18 Project Objectives

The Project Objectives include:

- Objective 1: Provide uses that meet the City's General Plan balanced development goals and objective to locate higher density housing adjacent to commercial and employment opportunities to encourage pedestrian access and provide a consumer base for commercial uses (GP LU-1.4).
- Objective 2: Provide a balanced mix of residential and commercial uses in the Cypress Business and Professional Center Specific Plan, which would promote a commercial environment that balances quality development with economic growth while building in flexibility to respond to the market demands (Cypress Business & Professional Center Specific Plan, Objectives 1.2 and 1.3).
- Objective 3: Support the retention of local employers and increase the fiscal benefits to the City by attracting new retail, restaurant, hotel and entertainment businesses that can better serve the local population and employment and would generate additional revenue to the City through increased sales, property, and transient occupancy taxes (GP LU-17.1).
- Objective 4: Meet the demand for new hotel rooms in the Cypress Business Center to serve the local business community.
- Objective 5: Provide new drainage improvements on the project site, which would reduce the risk of downstream flooding hazards.
- Objective 6: Provide a new community gathering place for Cypress residents and workers, including a public dog park and a landscaped plaza with outdoor dining areas.
- Objective 7: Allow the City to divest itself of real estate conveyed to it by the Cypress Redevelopment Agency in March 2011 in accordance with the Settlement Agreement between the City of Cypress, the Successor Agency to the Cypress Redevelopment Agency, the State Department of Finance, and the State Controller's Office, which would facilitate the generation of additional revenue to the City by selling the land to a private owner, who would return the land to the property tax rolls and develop it with new revenue-generating uses.
- Objective 8: Expand the variety of housing stock in the City, which would help meet the existing and future housing needs of all Cypress residents, by providing high density rental units (GP HOU-3.5).
- Objective 9: Expand and improve the City's housing supply by developing high-quality housing in the City to alleviate the housing crisis and help the City meet its Regional Housing Needs Assessment allocations (GP HOU-4).



5.5.18.1 Alternative 1: No Project Alternative

Under the No Project Alternative, the project site would remain a paved parking lot that would continue to be used for vehicle parking during events at the nearby Los Alamitos Race Course and temporarily used throughout the year as a Christmas tree lot, truck staging area, and auxiliary truck and trailer storage. No residential, commercial, or other new uses would be developed on the project site. The No Project Alternative would not include development of residential uses adjacent to commercial and employment opportunities, would not facilitate the generation of additional revenue to the City through the sale of the land and increased sales and property tax, and would not expand and improve the City's housing supply. Therefore, the No Project Alternative would not be consistent with any of the project objectives.

5.5.18.2 Alternative 2: Reduced Project Alternative

The Reduced Project Alternative would develop the project site with a mixed-use development with the commercial uses (e.g., hotel, retail, and restaurant uses) and residential uses. The Reduced Project Alternative would include residential uses adjacent to commercial and employment opportunities, would facilitate the generation of additional revenue to the City through the sale of the land and increased sales and property tax, and would expand and improve the City's housing supply. Therefore, the Reduced Project Alternative would be consistent with all of the project objectives, but to a lesser extent than the proposed project. This assumes, however, that a developer would be willing and able to purchase the project site and feasibly develop it at the reduced density.

5.5.18.3 Alternative 3: Commercial/Retail Alternative

The Commercial/Retail Alternative would develop the project site with retail and restaurant uses. The Commercial/Retail Alternative would not include residential or hotel uses. Therefore, the Commercial/Retail Alternative would not be consistent with the following project objectives:

- Objective 1: Provide uses that meet the City's General Plan balanced development goals and objective to locate higher density housing adjacent to commercial and employment opportunities to encourage pedestrian access and provide a consumer base for commercial uses (GP LU-1.4).
- Objective 2: Provide a balanced mix of residential and commercial uses in the Cypress Business and Professional Center Specific Plan, which would promote a commercial environment that balances quality development with economic growth while building in flexibility to respond to the market demands (Cypress Business & Professional Center Specific Plan, Objectives 1.2 and 1.3).
- Objective 4: Meet the demand for new hotel rooms in the Cypress Business Center to serve the local business community.
- Objective 6: Provide a new community gathering place for Cypress residents and workers, including a public dog park and a landscaped plaza with outdoor dining areas.



- Objective 8:** Expand the variety of housing stock in the City, which would help meet the existing and future housing needs of all Cypress residents, by providing high density rental units (GP HOU-3.5).
- Objective 9:** Expand and improve the City's housing supply by developing high-quality housing in the City to alleviate the housing crisis and help the City meet its Regional Housing Needs Assessment allocations (GP HOU-4).

If the City were able to find a buyer/developer for the project site with this alternative, the Commercial/Retail Alternative would facilitate the generation of additional revenue to the City through the sale of the land and increased sales and property tax from the new commercial/retail uses on the project site. However, the City's past experience in marketing the project site suggests that it would be difficult to sell the site for this purpose. The new commercial/retail uses would also create employment opportunities within the City. In addition, the Commercial/Retail Alternative would include drainage infrastructure and a detention system that would greatly reduce the amount of flows that would reach the downstream stormdrain system compared to the existing condition. Therefore, if economically feasible, the Commercial/Retail Alternative would be consistent with the following project objectives:

- Objective 3:** Support the retention of local employers and increase the fiscal benefits to the City by attracting new retail, restaurant, hotel, and entertainment businesses that can better serve the local population and employment and would generate additional revenue to the City through increased sales, property, and transient occupancy taxes (GP LU-17.1).
- Objective 5:** Provide new drainage improvements on the project site, which would reduce the risk of downstream flooding hazards.
- Objective 7:** Allow the City to divest itself of real estate conveyed to it by the Cypress Redevelopment Agency in March 2011 in accordance with the Settlement Agreement between the City of Cypress, the Successor Agency to the Cypress Redevelopment Agency, the State Department of Finance and the State Controller's Office, which would facilitate the generation of additional revenue to the City by selling the land to a private owner, who would return the land to the property tax rolls and develop it with new revenue-generating uses.

5.6 IDENTIFICATION OF ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires the identification of an Environmentally Superior Alternative among the proposed project and the alternatives evaluated in an EIR. *State CEQA Guidelines* Section 15126.6(e)(2) provides 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 and the proposed project. Table 5.C provides, in summary format, a comparison of the level of impacts of each alternative to the proposed project.



Table 5.C: Comparison of the Environmental Impacts of the Proposed Project and Project Alternatives

Impact Area	Proposed Project Impact with Mitigation (if any)	Alternative 1: No Project Alternative	Alternative 2: Reduced Project Alternative	Alternative 3: Commercial/Retail Alternative
Aesthetics	Less than Significant	Less	Less	Less
Air Quality	Less than Significant	Less	Less	Greater
Biological Resources	Less than Significant	Less	Similar	Similar
Cultural Resources	Less than Significant ¹	Less	Less	Less
Energy	Less than Significant	Less	Less	Less
Geology and Soils	Less than Significant ¹	Less	Less	Less
Greenhouse Gas Emissions	Significant and Unavoidable ¹	Less	Less/Greater ²	Less/Greater ²
Hazards and Hazardous Materials	Less than Significant	Less	Similar	Similar
Hydrology and Water Quality	Less than Significant	Greater	Similar	Similar
Land Use and Planning	Less than Significant	Greater	Similar	Similar
Noise	Less than Significant ¹	Less	Less	Greater
Population and Housing	Less than Significant	Less	Less	Less
Public Services	Less than Significant ¹	Less	Less	Less
Recreation	Less than Significant	Less	Less	Less
Transportation	Less than Significant	Less	Less	Greater
Tribal Cultural Resources	Less than Significant ¹	Less	Less	Less
Utilities and Service Systems	Less than Significant	Less	Less	Less

¹ Mitigation identified.

² This alternative would generate **less** total greenhouse gas emissions than the proposed project; however, it would generate a **greater** amount of greenhouse gas emissions per capita than the proposed project.



The No Project Alternative has the least impact on the environment because the project site would remain a paved parking lot and would thereby avoid most of the proposed project's environmental impacts. However, the No Project Alternative cannot be the only Environmentally Superior Alternative. Therefore, according to Section 15126.6(e)(2) of the *State CEQA Guidelines*, because the No Project Alternative has been identified as the environmentally superior alternative, the EIR shall also identify the proposed project or one of the other alternatives as the Environmentally Superior Alternative.

Putting aside the No Project Alternative, the Reduced Project Alternative is the Environmentally Superior Alternative. As shown in Table 5.C, the Reduced Project Alternative would result in more impacts that are "less" than the proposed project compared to the commercial/Retail Alternative. The Reduced Project Alternative has the least impact on the environment because the project site would be developed at a reduced density, thereby reducing the most of the proposed project's environmental impacts compared to the other alternatives (other than the No Project Alternative). Although the Reduced Project Alternative would result in less total greenhouse gas emissions than the proposed project, it would generate a greater amount of greenhouse gas emissions per capita than the proposed project. Therefore, its impacts would also be significant and unavoidable. The Reduced Project Alternative would also meet all of the project objectives, but to a lesser extent than the proposed project. Accordingly, it is determined that the Reduced Project Alternative is the Environmentally Superior Alternative because it would meet all of the project's objectives and would result in reduced environmental impacts as compared to the proposed project.



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