

Chapter 6 Other CEQA Considerations

Section 15126 of the California Environmental Quality Act (CEQA) Guidelines requires all phases of a project to be considered when evaluating its impact on the environment: planning, acquisition, development, and operation. Additionally, Section 15128 of the CEQA Guidelines requires a brief statement disclosing the reasons why various possible significant effects of a project were found not to be significant and, therefore, would not be discussed in detail in the Environmental Impact Report (EIR). This chapter includes the following other considerations that are pursuant to Sections 15126.2(b), 15126(c), 15126(d), and 15128 of the CEQA Guidelines:

- Significant and unavoidable environmental impacts (refer to Section 6.1, Significant and Unavoidable Environmental Impacts)
- Significant irreversible changes due to the proposed project (refer to Section 6.2, Significant Irreversible Changes Due to the Proposed Project)
- Growth-inducing impacts of the Proposed Project (refer to Section 6.3, Growth-Inducing Impacts)
- Effects not found to be significant (refer to Section 6.4, Effects Found Not to Be Significant)

6.1 Significant and Unavoidable Environmental Impacts

Section 15126.2(b) of the CEQA Guidelines requires that an EIR describe any significant impacts that could not be avoided, even with the implementation of feasible mitigation measures. The environmental effects of the project on various aspects of the environment are discussed in detail in Chapter 4, Environmental Analysis, of this Draft EIR.

This EIR did not determine any significant and unavoidable environmental impact that would result from development of the project.

6.2 Significant Irreversible Changes Due to the Proposed Project

Section 15126.2(d) of the CEQA Guidelines requires a discussion of any significant, irreversible environmental changes that would be caused by the project. Generally, a project would result in significant, irreversible environmental impacts if the following would occur:

- The project would involve a large commitment of nonrenewable resources.
- The primary and secondary impacts would generally commit future generations to similar uses (e.g., a highway improvement that provides access to a previously inaccessible area).
- The project would involve uses in which irreversible damage could result from any potential environmental accidents associated with the project.
- The proposed consumption of resources is not justified (e.g., the project involves wasteful use of energy).

The project would result in following minor irreversible environmental changes:

- Development of the project would include two water impoundments for groundwater recharge and recreation by installing inflatable three rubber dams (impoundments), modifying the riverbanks, constructing two pedestrian/bike bridges, providing new trails, improving existing trails, creating new and protection of existing access ramps, constructing two new undercrossings on the west bank at the Union Pacific Railroad and the Metrolink railroad, providing enhanced community recreation amenities, and other improvements. The project would require the irreversible consumption of energy and natural resources. Electricity would be consumed for power tools, electric equipment, and lighting. Nonrenewable and limited resources required for the project could include oil, natural gas, gasoline, lumber, sand and gravel, asphalt, aggregate, water, steel, and similar materials. Additionally, nonrenewable fuels would be used by construction equipment, haul trucks, and worker vehicles. This commitment of natural resources and energy would be irreversible, and would limit the availability of such resources for other uses. However, given the size and nature of the project, the commitment of nonrenewable resources, while irretrievable, would not be of significant commitment. Post-construction, the project would have positive impacts on nonrenewable resources by providing active transportation facilities (trails and pedestrian/bike bridges), which would help reduce vehicle miles traveled, thereby lessen consumption of fossil fuels and electricity consumption for transportation. Additionally, the groundwater recharge area would support groundwater replenishment. Therefore, the project would result in minor irreversible environmental changes in this regard.
- The project would result in primary and secondary impact that would generally commit future generations to similar uses by providing new pedestrian/bike bridges, trail improvements, groundwater recharge, and recreation amenities. However, these uses would benefit future generations and would not be considered adverse environmental impacts of the project. Therefore, the project would not result in significant and irreversible environmental changes in this regard.
- The project would not involve uses in which irreversible damage could result from any potential environmental accidents associated with the project. As discussed in Sections 4.1 through 4.10, the project would not result in potentially significant impact during and after construction. However, those impacts would be mitigated to less than significant levels with mitigation measures, therefore, no significant and unavoidable impact would remain. The project would not result in significant and irreversible environmental changes in this regard.
- The project construction would not involve the wasteful use of energy, and consumption of resources is justified as the project would have beneficial impacts to the community's

health and natural resource needs, while complementing existing facilities, therefore, meet the project objectives listed in Section 2.2, Project Objectives. The project would not result in significant and irreversible environmental changes in this regard.

As discussed above, the project would generally result in irreversible changes that would benefit the environment and future generation with minor adverse impacts during construction.

6.3 Growth-Inducing Impacts

CEQA Guidelines, Section 15126.2(e), requires that an EIR discuss the potential growth-inducing impacts of a proposed project. More specifically, CEQA Guidelines, Section 15126.2(e), requires that an EIR:

Discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth (a major expansion of a waste water treatment plant might, for example, allow for more construction in service areas). Increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. Also discuss the characteristics of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.

The project includes various groundwater recharge, trails, pedestrian/bike bridges, and enhanced community recreational amenities along the Santa Ana River corridor to benefit and promote environmental and community health, recreation, safety, entertainment, wayfinding, beauty, connectivity, water supply, economic, and natural resource needs. Most components of the project would operate passively and would not involve any growth inducing uses that would foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. The surrounding environment is already developed or is planned to be developed with mixed uses. Although the project would create groundwater recharging areas by installing two river impoundments, such project component is not intended to remove obstacles to population growth. The project also does not involve any changes to land use policies that provide economic stimulus such as industrial or commercial uses that may induce growth in the area. The project would improve the already existing Santa Ana River Trail to better serve the residents and visitors of the Cities of Anaheim and Orange. Furthermore, it is anticipated that the project can be serviced by the existing labor force within the County of Orange or surrounding communities during construction, and no relocation of construction workers to the Cities of Anaheim or Orange would be necessary. The project does not propose new infrastructure

that would induce substantial growth within the vicinity or in the project Site that was not previously considered for development. Growth-inducing impacts would be less than significant.

6.4 Effects Found Not to Be Significant

Section 15128 of the California Environmental Quality Act (CEQA) Guidelines requires that an EIR contain a brief statement disclosing the reasons why various possible significant effects of a project were found not to be significant and, therefore, would not be discussed in detail in the EIR. The City of Anaheim reviewed the project against the environmental issue areas in Appendix G of the CEQA Guidelines. All environmental issue areas, including those found to have potentially significant impacts, are addressed in Chapter 4 of this Draft EIR except the following: Aesthetics, Agriculture and Forestry Resources, Land Use and Planning, Mineral Resources, Population and Housing, Public Services, Recreation, Utilities and Service Systems, and Wildfire.

The Notice of Preparation and corresponding Initial Study (Appendix A of this Draft EIR) prepared for the project in March 2023 determined that impacts listed in Table 6-1, Effects Found Not to Be Significant, would be less than significant or no impact. Consequently, they have not been further analyzed in this Draft EIR. Impact categories and questions below are summarized directly from the CEQA Environmental Checklist.

Table 6-1. Effects Found Not to Be Significant

Threshold	Impact Analysis
<p>Aesthetics. According to Appendix G of the CEQA Guidelines, a project has a significant impact on aesthetics if it meets any of the following thresholds:</p>	
<p>a) Has a substantial adverse effect on a scenic vista.</p>	<p>No Impact. One of the four main goals of the project is to implement improvements to the Santa Ana River corridor that enhance the aesthetic and ecology of the river and surrounding region. Each of the proposed various improvements have been rated, 1-5, on their ability to achieve that goal in the feasibility study for the project, and all of the various proposed improvements would have a positive impact on the aesthetics of the area. There are no scenic highways near the project area therefore the project would not adversely impact a scenic vista. No impacts would occur.</p>
<p>b) Substantially damages scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.</p>	<p>No Impact. The closest California State Scenic Highway to the project area is the portion of the State Route (SR) 91, between SR-55 and Weir Canyon Road, approximately 3.5 miles northeast of the project area. The Proposed Project would not damage any scenic resources within a State Scenic Highway. No impacts would occur.</p>

Table 6-1. Effects Found Not to Be Significant

Threshold	Impact Analysis
<p>c) In non-urbanized areas, substantially degrades the existing visual character or quality of public views of the site and its surroundings. (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, conflicts with applicable zoning and other regulations governing scenic quality.</p>	<p>No Impact. The project proposes to improve the existing visual character and public access to view the Santa Ana River corridor via improved bike and pedestrian trails, walkways and bridges, habitat restoration, riverbank erosion control and landscape enhancements, and the construction of cantilever viewing decks and public art installations. The project area is designated as Open Space and zoned as Recreation Open Space, Transition, Public Recreational and would not conflict with any applicable regulations concerning scenic quality. The visual character of the area would not be degraded by the project and would instead be improved. No impacts would occur.</p>
<p>d) Creates a new source of substantial light or glare which would adversely affect day or nighttime views in the area.</p>	<p>Less Than Significant Impact. There would be an introduction of minimal lighting to support the proposed bikeway and pedestrian trails; however, any lighting included in the Proposed Project would comply with all local municipal and state codes and regulations. Therefore, the project would not create a new substantial source of light or glare that would adversely affect day or nighttime views in the area. Less than significant impacts would occur.</p>
<p>Agriculture and Forestry Resources. According to Appendix G of the CEQA Guidelines, a project has a significant impact on agriculture and forestry resources if it meets any of the following thresholds:</p>	
<p>a) Converts Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use.</p>	<p>No Impact. The project is all within Urban and Built-Up Land according to the California Important Farmland Finder, and therefore would not have any impact on important or unique farmland.</p>
<p>b) Conflicts with existing zoning for agricultural use, or a Williamson Act contract.</p>	<p>No Impact. There are no Williamson Act contracts located on or adjacent to the project area. The project would not conflict with existing zoning for agricultural use or a Williamson Act contract. No impacts would occur.</p>
<p>c) Conflicts with existing zoning for, or cause rezoning of, forest land (as defined in California Public Resources Code section 12220(g)), timberland (as defined by California Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by California Government Code section 51104(g)).</p>	<p>No Impact. The project site is not located on forest land, timberland or any land zoned as timberland. No impacts would occur.</p>
<p>d) Results in the loss of forest land or conversion of forest land to non-forest use.</p>	<p>No Impact. The project site does not contain any forest land, and therefore will not result in the conversion of forest land to another use. No impacts would occur.</p>
<p>e) Involves other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use.</p>	<p>No Impact. The project site does not contain any important farmland or agricultural land, and therefore could not result in the conversion of farmland or agricultural land to another land use. Furthermore, the project would enhance and improve the current land designation of Open Space through landscape enhancements and habitat restoration. No impacts would occur.</p>

Table 6-1. Effects Found Not to Be Significant

Threshold	Impact Analysis
Air Quality. According to Appendix G of the CEQA Guidelines, a project has a significant impact on air quality if it meets any of the following thresholds:	
a) Conflicts with or obstruct implementation of the applicable air quality plan.	No Impact. The types of improvements associated with the project are consistent with SCAQMD's Air Quality Management Plan as it includes various multi-purpose improvements. These improvements would promote alternative modes of transportation.
b) Results in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard).	Less Than Significant. Operation Impact - Operation of the project is not expected to result in a cumulatively considerable net increase of any criteria pollutant as the project includes various multi-purpose improvements to the existing trail network that would ultimately promote alternative modes of transportation, enhance the landscape, and provide habitat restorations.
c) Exposes sensitive receptors to substantial pollutant concentrations.	Less Than Significant. Operation Impact – Operation of the project would not expose sensitive receptors to substantial pollutants concentrations. The project includes various multi-purpose improvements to the existing trail network that would ultimately promote alternative modes of transportation, enhance the landscape, and provide habitat restorations; therefore, the nature of the project does not include uses that would result in substantial pollutant concentrations.
d) Results in other emissions (such as those leading to odors) adversely affecting a substantial number of people.	Less Than Significant. Operation Impact– Land uses and industrial operations associated with odor complaints include agricultural uses, wastewater treatment plants, food-processing plants, chemical plants, composting operations, refineries, landfills, dairies, and fiberglass molding facilities. Operation of the project would not result in other emissions that would adversely affect a substantial number of people. The project includes various multi-purpose improvements to the existing trail network that would ultimately promote alternative modes of transportation, enhance the landscape, and provide habitat restorations; therefore, the nature of the project does not include uses that would result in emissions (such as those leading to odors) that would adversely affect a substantial number of people.
Biological Resources. According to Appendix G of the CEQA Guidelines, a project has a significant impact on biological resources if it meets any of the following thresholds:	
e) Conflicts with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.	No Impact. Implementation of the project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. While the City of Anaheim has a Street Tree Replacement Ordinance under City Code, Section 13.12.060, and the City of Orange has a Street Tree and Tree Preservation Ordinance under City Code, Sections 12.28 and 12.32, no City trees would be removed as part of the project. The City of Anaheim Municipal Code 18.18.040 has a Tree Preservation Ordinance for Scenic Corridors (SC), the project would also not conflict with this as it is outside of a scenic corridor. No impact would occur.
f) Conflicts with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.	No Impact. An Natural Community Conservation Plan (NCCP) identifies and provides for the regional protection of plants, animals, and their habitats, while allowing compatible and appropriate economic activity. The purpose of the NCCP is to offset project-related impacts on threatened and endangered species and their habitat in a manner that protects and enhances ecological diversity and function in Orange County and enhances the integrity and connectivity of the existing protected lands in Orange County. As required by the NCCPA, the Plan will protect native biological diversity, habitat for native species, natural communities, and local ecosystems. This broad scope will conserve a wide range of natural resources, including native species that are common or rare.

Table 6-1. Effects Found Not to Be Significant

Threshold	Impact Analysis
	<p>The County of Orange (Central/Coastal) NCCP/Habitat Conservation Plan's (HCP) main goal is to protect and manage habitat supporting a broad range of plants and animals found in the central and coastal subregion. The plan also has a focus on protecting the coastal sage scrub mosaic habitat through the creation of a Reserve System, protecting the federally listed California gnatcatcher, the coastal cactus wren and the orange-throated whiptail lizard, while also allowing social and economic uses within the subregion that are compatible with protecting identified species, thus providing long-term protection for a broad range of species and avoiding land use conflicts.</p> <p>Implementation of the project does not have the potential to conflict with the provisions of an adopted HCP or NCCP. The project includes habitat restoration, riverbank erosion control and landscape enhancements. This would be aligned with the primary goals and purposes of the applicable NCCP/HCP for the project area. The project area lies within the Orange County Transportation Authority NCCP/HCP and the Orange County NCCP/HCP; however, the proposed improvements do not conflict with the provisions of either NCCP/HCP.</p>
<p>Cultural Resources. According to Appendix G of the CEQA Guidelines, a project has a significant impact on cultural resources if it meets any of the following thresholds:</p>	
<p>c) Disturbs any human remains, including those interred dedicated cemeteries.</p>	<p>No Impact. California Health and Safety Code, Section 7050.5, requires that in the event that human remains are discovered on the project site, disturbance of the site shall halt and remain halted until the County Coroner has conducted an investigation into the circumstances, manner, and cause of any death and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation or to their authorized representative. If the County Coroner determines that the remains are not subject to their authority and if the County Coroner has reason to believe the human remains are those of a Native American, they shall contact the Native American Heritage Commission by telephone within 24 hours. The project would comply with existing law, and the potential impact to human remains will be less than significant. Additionally, the river bottom of the Santa Ana River (SAR) has been subject to historical river flows and is subject to continual grading as part of maintenance activities. No human remains have ever been discovered within the project site.</p>
<p>Energy. According to Appendix G of the CEQA Guidelines, a project has a significant impact on energy if it meets any of the following thresholds:</p>	
<p>a) Results in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.</p>	<p>Less Than Significant. The project would be responsible for an incremental increase in the consumption of energy resources during construction due to on-site use of construction equipment and vehicle and truck trips. Construction activities that include the use of natural gas, petroleum, or electricity would be temporary and negligible and would not have an adverse effect. Construction equipment would be required to comply with California Air Resources Board emissions requirements for construction equipment, which include measures to reduce fuel consumption, such as imposing limits on idling and requiring older engines and equipment to be retired, replaced, or repowered. Additionally, implementation of the project involves recreational improvements that would promote alternative modes of transportation, potentially reducing future energy use. Therefore, the project does not have the potential to significantly impact the environment due to wasteful, inefficient, or unnecessary consumption of energy resources.</p>

Table 6-1. Effects Found Not to Be Significant

Threshold	Impact Analysis
b) Conflicts with or obstruct a state or local plan for renewable energy or energy efficiency.	No Impact. Though the project would introduce lighting as a part of the pedestrian and bicycle trails, energy use for these would be nominal and would not encourage the wasteful, inefficient, or unnecessary consumption of utilities. Implementation of the project involves recreational improvements that would promote alternative modes of transportation, potentially reducing future energy use. Therefore, the project is consistent with state or local plans energy efficiency.
Geology and Soils. According to Appendix G of the CEQA Guidelines, a project has a significant impact on geology and soils if it meets any of the following thresholds:	
e) Has soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.	Less Than Significant. The project would be responsible for an incremental increase in the consumption of energy resources during construction due to on-site use of construction equipment and vehicle and truck trips. Construction activities that include the use of natural gas, petroleum, or electricity would be temporary and negligible and would not have an adverse effect. Construction equipment would be required to comply with California Air Resources Board emissions requirements for construction equipment, which include measures to reduce fuel consumption, such as imposing limits on idling and requiring older engines and equipment to be retired, replaced, or repowered. Additionally, implementation of the project involves recreational improvements that would promote alternative modes of transportation, potentially reducing future energy use. Therefore, the project does not have the potential to significantly impact the environment due to wasteful, inefficient, or unnecessary consumption of energy resources.
f) Directly or indirectly destroys a unique paleontological resource or site or unique geologic feature.	Less Than Significant. Implementation of the project is unlikely directly or indirectly destroy a unique paleontological resource or site or a unique geologic feature. No grading to an increased depth extending beyond riverwash, channel deposits, and alluvium soils that have been regularly disturbed for maintenance purposes is proposed in the riverbed. Grading may affect the riverbanks but these already consist of manufactured slopes and the likelihood of paleontological resources is low.
Greenhouse Gas Emissions. According to Appendix G of the CEQA Guidelines, a project has a significant impact on greenhouse gas emissions if it meets any of the following thresholds:	
a) Generates greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.	Less Than Significant. Operation Impact - Operation of the project is not expected to generate significant greenhouse gas emissions, and will likely reduce greenhouse gas emissions, as the project includes various multi-purpose improvements to the existing trail network that would ultimately promote alternative modes of transportation, enhance the landscape, and provide habitat restorations. The project does not include uses that would result in increased traffic or greenhouse gas emissions.
b) Conflicts with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.	No Impact. Implementation of the project involves recreational improvements that would promote alternative modes of transportation, potentially reducing future greenhouse gas emissions. Therefore, the project is consistent with applicable plans, policies and regulations adopted for the purpose of reducing the emissions of greenhouse gases (such as Assembly Bill 32).

Table 6-1. Effects Found Not to Be Significant

Threshold	Impact Analysis
<p>Hazards and Hazardous Materials. According to Appendix G of the CEQA Guidelines, a project has a significant impact on hazards and hazardous materials if it meets any of the following thresholds:</p>	
<p>a) Creates a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.</p>	<p>Less Than Significant. The project includes the construction of various multi-purpose improvements along the SAR corridor, including bikeway and pedestrian walkway improvements, river impoundments, habitat restoration, landscaping, urban stormwater treatment, river recreation amenities, public art installation and the construction of cantilever decks over the river basin. The project would not use a substantial amount of hazardous materials during construction. Hazardous materials that would be used during construction (e.g., petroleum-based products, paints, solvents, sealers) would be transported, used, stored, and disposed of according to City, County, state, and federal regulations. As indicated above, primary operation of the project would result in the use of the bikeway and pedestrian trail and associated improvements, and therefore, the project would not involve routine transport, use, or disposal of hazardous materials, or result in the release of hazardous materials into the environment. Therefore, hazards to the public or the environment through the routine transport, use, or disposal of hazardous materials would be less than significant.</p>
<p>c) Emits hazardous emissions or handles hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.</p>	<p>No Impact. There are no elementary schools located within one-quarter mile of the project area. The closest school is Sycamore Elementary School located at 340 N Main Street, which is approximately 1.8 miles from the project site. Therefore, no impacts associated with the handling or emission of hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school would occur.</p>
<p>e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, results in a safety hazard or excessive noise for people residing or working in the project area.</p>	<p>No Impact. The project area is not located within 2 miles of a public airport or in the vicinity of a public airport or public use airport. The closest airport to the project area is the Fullerton Municipal Airport which is approximately 10.5 miles to the northwest. Therefore, implementation of the project would not result in public safety impacts associated with airports.</p>
<p>f) Impairs implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.</p>	<p>Less Than Significant. Traffic flow could be temporarily disrupted during construction of the project in the area. However, construction of the project would not obstruct emergency operations, or hinder emergency responder access in the project vicinity. The project area is adjacent to the SAR and set back from traffic flow and emergency routes. Additionally, all construction equipment would be staged on or directly adjacent to the project site. Upon completion of construction activities, operation of the project would not obstruct traffic flow or emergency operations as the project includes improvements to an existing trail that is currently being serviced by fire trucks, police units, and ambulance/paramedic vehicles.</p> <p>The project would comply with applicable City regulations, such as the requirement to comply with the City’s fire code to provide adequate emergency access as required by the Orange County Fire Department, as well as the California Building Standards Code. Prior to the issuance of building permits, the City of Anaheim would review project site plans, including location of all buildings, fences, access driveways and other features that may affect emergency access. Compliance with existing requirements would ensure that impacts related to emergency response or evacuation would be less than significant.</p>

Table 6-1. Effects Found Not to Be Significant

Threshold	Impact Analysis
g) Exposes people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.	Less Than Significant. The project area is situated along the SAR corridor. Neither the City of Anaheim General Plan or the City of Orange General Plan designates this area as a high fire hazard severity zone. The project area is approximately 5 miles due west from the closest very high fire hazard severity zone in the Irvine Regional Park located in the City of Orange. The project area is not in or near state responsibility areas or lands classified as very high fire hazard severity zones. Therefore, wildland fire-related impacts would be less than significant.
Hydrology and Water quality. According to Appendix G of the CEQA Guidelines, a project has a significant impact on hydrology and water quality if it meets any of the following thresholds:	
b) Substantially decreases groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.	Less Than Significant. The project site is generally located between Orangewood Avenue and Ball Road and provides a unique opportunity to create additional Orange County Water District (OCWD) groundwater replenishment system location by impounding water in the SAR, utilizing a much larger footprint for infiltration along the riverbed. This additional impoundment area not only provides recharge volume on site, but also serves as a safety net. If any stormwater does not infiltrate by the time it reaches Ball Road, it would be captured for infiltration by the river impoundment opportunity. An impoundment of water in the SAR south of Ball Road could be seen as an additional recharge facility proportional to many of the other OCWD facilities. Current operations of the OCWD include the annual construction of what are referred to as "T" and "L" levees in the river bottom. These levees are built to force the shallow water to flow back and forth between the banks of the river, thereby maximizing its percolating surface. Although the river is wet half of the year in this lower reach, it is the OCWD's goal to capture and recharge every gallon it can. The proposed river impoundments would increase infiltration of water in the SAR below Ball Road and would eliminate the need for OCWD grading "T" and "L" soil levees within the impoundment areas. Therefore, impacts to groundwater supplies would be improved with the project.
e) Conflicts with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.	Less Than Significant. Operation Impact – The project includes river impoundments that would positively impact the local groundwater basin. The impoundment structures would be installed to create semi-permanent water bodies in the SAR for groundwater recharge and community benefit, and infiltrate through the soft bottom riverbed. The project would otherwise include improvements to an existing bicycle and pedestrian trail system through landscaping improvements, habitat restoration, and construction of cantilever viewing decks and public art installations. and therefore, operation would not significantly impact a water quality control plan or sustainable groundwater management plan.
Land Use and Planning. According to Appendix G of the CEQA Guidelines, a project has a significant impact on land use and planning if it meets any of the following thresholds:	
a) Physically divides an established community.	No Impact. The project involves the implementation of Active Transportation Improvements, including the extension of the Santa Ana River Trail (SART) along the west bank, addition of the SART along the east bank, and the construction of a new pedestrian and bicycle bridge as well as the expansion of existing active transportation bridges. The project has no potential to divide an established community, rather the proposed improvements would further connect the existing community and improve access to community amenities. Therefore, no impacts related to physically dividing an established community would occur.

Table 6-1. Effects Found Not to Be Significant

Threshold	Impact Analysis
<p>b) Causes a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.</p>	<p>No Impact. The project site is located within the SAR corridor generally between the Ball Road and Orangewood Avenue bridge crossings, The project is primarily located within the City of Orange, and partially located within the City of Anaheim. The City of Orange zoning designation along the eastern bank of the SAR is Recreation Open Space, and the General Plan Land Use designation is Open Space. On the western side of the SAR, the project area is zoned by the City of Anaheim as Transition from Ball Road south to the train tracks, and then Public Recreational from the train tracks south to East Katella Avenue. The project involves the implementation of multi-purpose recreational improvements. No changes to the existing City of Orange zoning and land use designations would occur. The project would be consistent with the existing zoning and land use designations. Therefore, the project would not conflict any applicable City of Orange land use plan, policy, or regulation. No impact would occur.</p>
<p>Mineral Resources. According to Appendix G of the CEQA Guidelines, a project has a significant impact on mineral resources if it meets any of the following thresholds:</p>	
<p>a) Results in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.</p>	<p>No Impact. There are no current mining activities within the project area. Both the City of Orange and County of Orange General Plans identify the SAR as a mineral resource zone. According to the General Plans, construction aggregate is found in the natural sand and gravel deposits of the SAR. Furthermore, the project area has been classified as Sand and Gravel Resource Areas and Cement Concrete Aggregate by the California Department of Conservation SMARA study areas. However, the project would not preclude the availability of mineral resources in the future.</p>
<p>b) Results in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan.</p>	<p>No Impact. The Project Site is not a locally important mineral resource recovery site according to maps obtained through the California Department of Conservation and California Geological Survey. As stated above, the project would not preclude the availability of mineral resources in the future. Therefore, implementation of the project would not result in the loss of availability of a locally important mineral resource. No impact will occur.</p>
<p>Noise. According to Appendix G of the CEQA Guidelines, a project has a significant impact on noise if it meets any of the following thresholds:</p>	
<p>c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, exposes people residing or working in the project area to excessive noise levels.</p>	<p>No Impact. The project is not located within the vicinity of a private airstrip. The closest public use airport to the project is Fullerton Municipal Airport located approximately 6.8 miles northwest of the project site. Therefore, implementation of the project would not result in the exposure of people to excessive noise generated by a private airstrip. No impact would occur.</p>
<p>Population and Housing. According to Appendix G of the CEQA Guidelines, a project has a significant impact on population and housing if it meets any of the following thresholds:</p>	
<p>a) Induces substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).</p>	<p>No Impact. The project involves the implementation of various multi-purpose improvements that have been identified to transform the SAR. There is no proposed residential or commercial/business component that could result in substantial population growth in the area. Therefore, implementation of the project would not induce growth, either directly or indirectly.</p>

Table 6-1. Effects Found Not to Be Significant

Threshold	Impact Analysis
b) Displaces substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.	No Impact. The project involves the implementation of various multi-purpose improvements that have been identified to transform the SAR corridor. The project area does not contain residential structures. Therefore, implementation of the project would not displace any existing housing, nor would the project necessitate the construction of replacement housing. No impact would occur.
Public Services. According to Appendix G of the CEQA Guidelines, a project has a significant impact on public services if it meets any of the following thresholds:	
<p>a) Results in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:</p> <p>Fire protection.</p>	Less Than Significant Impact. The Orange City Fire Department provides fire protection services within the City of Orange. City of Orange Fire Department is located at 1910 N Shaffer St, Orange, CA 92865, adjacent to the project area on the eastern bank of the SAR. Anaheim Fire Department Station #7 is located at 2222 East Ball Road, Anaheim, California 92806, adjacent to the project area on the western bank of the SAR. The project does not involve development of new residential or non-residential structures that would contribute to a permanent increase in population to the area. The Proposed Project involves the implementation of various improvements that have been identified to transform the SAR corridor. These improvements are being implemented in the existing trail system that is already being serviced by fire protection services. As the project represents improvement to, and enhancement of, existing recreational facilities, and would not induce substantial population growth, it is not anticipated that the project would result in a substantial increase in the need for fire protection services. Impacts to fire protection services would be less than significant.
Police protection.	Less Than Significant Impact. The Orange Police Department provides law enforcement and crime prevention services to the City of Orange. The project does not involve development of new residential or non-residential structures that would contribute to a permanent increase in population to the area. As stated previously, the project involves the implementation of various multi-purpose improvements that have been identified to transform the SAR corridor. These improvements are being implemented in the existing trail system that is already being serviced by police protection services. As the project represents improvement to, and enhancement of, existing recreational facilities, and would not induce substantial population growth, it is not anticipated that the project would result in a substantial increase in the need for police protection services. Although the project would increase accessibility to the public on the channel, additional people and activities would also increase natural public surveillance, and river activation would likely reduce overnight encampments. Although the project could slightly increase the need for and frequency of patrol, it would not require new or expanded police facilities to create adverse environmental impacts. Impacts to police protection services would be less than significant.
Schools.	Less Than Significant Impact. The project does not include new residential development and would not result in an increased demand for school services. As such, the project would not result in the need to alter existing schools or construct new schools, the construction of which could result in significant impacts on the physical environment. Therefore, no impacts related to schools would occur.

Table 6-1. Effects Found Not to Be Significant

Threshold	Impact Analysis
Parks.	Less Than Significant Impact. The project is a recreation-related project involving the implementation of various multi-purpose improvements. The project does not, however, include any residential structures that would involve a permanent increase in population to the area. As such, the project would not result in an increased demand for additional park facilities in order to maintain acceptable service ratios. Therefore, no impacts related to the need for new or physically altered parks would occur.
Other public facilities.	Less Than Significant Impact. No other public services would be impacted by the project. The project is not expected to adversely affect any other governmental services in the area. Therefore, no impacts related to other public facilities would occur.
Recreation. According to Appendix G of the CEQA Guidelines, a project has a significant impact on recreational facilities if it meets any of the following thresholds:	
Increases the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.	Less Than Significant Impact. The project would not induce substantial population growth in the City. As such, the project would not increase the use of existing parks and recreational facilities such that substantial physical deterioration of recreational facilities would occur or be accelerated. The project would implement various multi-purpose improvements. These improvements would be beneficial in adding to and expanding upon existing recreational facilities along the SAR corridor. Therefore, the project would add recreational resources within the project area and reduce demand on existing recreational facilities. A less than significant impact will occur.
Includes recreational facilities or requires the construction or expansion of recreational facilities that might have an adverse physical effect on the environment.	Less Than Significant Impact. The project would increase the amount of recreational facilities within the project area. The project includes various multi-purpose improvements. However, the additional facilities would not have an adverse impact of the physical environment. A less than significant impact will occur.
Transportation. According to Appendix G of the CEQA Guidelines, a project has a significant impact on transportation if it meets any of the following thresholds:	
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.	Less Than Significant Impact. The project includes various multi-purpose improvements. These improvements would promote alternative modes of transportation. Additionally, existing parking can be accessed off of Katella Avenue, Douglas Road, and adjacent to the Proposed River Road. A proposed connection is also considered between the River Walk trail and the entrance to the Anaheim Coves parking area off of Phoenix Club Drive. Therefore, implementation of the project would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. Therefore, impacts would be less than significant.
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).	Less Than Significant Impact. All transportation improvements would be designed in accordance with adopted street and trail improvement standards. Therefore, implementation of the project does not have the potential to substantially increase hazards due to a geometric design feature or incompatible uses. Therefore, impacts would be less than significant.
d) Result in inadequate emergency access.	No Impact. Implementation of the project would not affect existing emergency access. During construction, surrounding roadways would continue to provide emergency access to the project site and surrounding properties. The project would comply with applicable City regulations, such as the requirement to comply with the City's fire code to provide adequate emergency access as required by the Orange County Fire Department, as well as the California Building Standards Code. Prior to the issuance of building permits, the City of Anaheim would review project site plans, including location of all buildings, fences, access driveways and other features that may affect emergency access. Therefore, no impact would occur.

Table 6-1. Effects Found Not to Be Significant

Threshold	Impact Analysis
<p>Utilities and Service Systems.</p>	<p>According to Appendix G of the CEQA Guidelines, a project has a significant impact on utilities and service systems if it meets any of the following thresholds:</p>
<p>a) Requires or results in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.</p>	<p>Less Than Significant Impact. The project consists of various multi-purpose improvements along the SAR basin including active transportation improvements, river impoundments and community amenities. These recreational improvements would not require the construction or expansion of existing utilities and service systems. The project includes landscape enhancement, upland habitat restoration, river impoundment, riverbank modifications, and urban storm water treatment plans would relieve existing pressure on wastewater treatment services and improve efficiency for the City. Therefore, less than significant impacts would occur.</p>
<p>b) Has sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years.</p>	<p>Less Than Significant Impact. The landscape programming for the project would entail minimal maintenance and limited irrigation requirements, instead depending on vegetation to establish and thrive as historically native vegetation that is tolerant of the semi-arid conditions of this region. The project would include public amenities such as drinking fountains. The proposed amenities would require a nominal amount of water to serve the project. Additionally, as stated, the project involves the implementation of various multi-purpose improvements along the SAR basin including active transportation improvements, river impoundments and community amenities. The proposed river impoundments would provide groundwater recharge for the County, and also help facilitate groundwater replenishment. The proposed impoundments are inflatable, and during times of heavy rainfall or storms would be deflated to allow for the natural discharge of the SAR. Impacts would be less than significant.</p>
<p>c) Results in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.</p>	<p>Less Than Significant Impact. As stated above, the project would improve the existing wastewater treatment system via expansion of urban stormwater treatment, riparian landscaping, and habitat restoration. Impacts would be less than significant.</p>
<p>d) Generates solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impairs the attainment of solid waste reduction goals.</p>	<p>Less Than Significant Impact. The project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure. Impacts would be less than significant.</p>
<p>e) Complies with federal, state, and local management and reduction statutes and regulations related to solid waste.</p>	<p>Less Than Significant Impact. The project would comply with all federal state and local management and reduction statutes and regulations related to solid waste. Impacts would be less than significant.</p>

Table 6-1. Effects Found Not to Be Significant

Threshold	Impact Analysis
<p>Wildfire. According to Appendix G of the CEQA Guidelines, a project has a significant impact regarding wildfire if it meets any of the following thresholds:</p>	
<p>a) Substantially impairs an adopted emergency response plan or emergency evacuation plan.</p> <p>b) Due to slope, prevailing winds, and other factors, exacerbates wildfire risks, and thereby exposes project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.</p> <p>c) Requires the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.</p> <p>d) Exposes people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.</p>	<p>No Impact. The project area is approximately 5 miles due west from the closest very high fire hazard severity zone in the Irvine Regional Park located in the City of Orange. According to CAL FIRE’s California Fire Hazard Severity Zone Maps the project area is not in or near state responsibility areas or lands classified as very high fire hazard severity zones, therefore impacts to a-d in wildfire would be less than significant.</p>

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