

Chapter 5 Alternatives

Section 15126.6 of the California Environmental Quality Act (CEQA) Guidelines requires that an Environmental Impact Report (EIR) describes a reasonable range of alternatives to a proposed project that could feasibly attain most of the project objectives while avoiding or considerably reducing any of the significant impacts of the proposed project. In addition, a “No Project” Alternative must be analyzed in the document. CEQA also requires that an environmentally superior alternative be identified from among the alternatives. The environmentally superior alternative is the alternative with the fewest or least severe adverse environmental impacts. When the No Project Alternative is the environmentally superior alternative, the EIR must also identify an environmentally superior alternative from among the other alternatives (CEQA Guidelines, Section 15126.6[e][2]).

The CEQA Guidelines emphasize a commonsense approach. The alternatives shall be reasonable, “foster informed decision making and public participation,” and focus on alternatives that avoid or substantially lessen the significant impacts (CEQA Guidelines, Section 15126.6[a]). CEQA does not require that an EIR present the alternatives analysis in the same level of detail as the assessment of the proposed project, and does not require that every conceivable alternative to a project be considered.

To develop a reasonable range of alternatives to the project, the City of Anaheim considered:

- Project objectives
- Significant impacts of the proposed project
- Alternatives suggested during the scoping process
- Other alternatives considered

Through this process, the City of Anaheim identified four possible alternatives. Of these, two were dismissed from further consideration because they did not meet most project objectives or were not considered even potentially feasible, and two were identified as project alternatives to be evaluated, in addition to the No Project Alternative required by CEQA.

This chapter includes a description of how the project alternatives were developed, an evaluation of the alternatives in comparison to the proposed project, and identification of the environmentally superior alternative.

5.1 Significant and Unavoidable Impacts

Pursuant to CEQA Guidelines, Section 15126.6(b), alternatives to the project include those that avoid or substantially lessen 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. Based on the analysis contained in Chapter 4, Environmental Analysis, the project would not result in any significant and unavoidable adverse impacts.

5.2 Project Objectives

The process of identifying potential alternatives involves consideration of the objectives for the project, which are described in Section 2.2, Project Objectives, in Chapter 2, Project Description, and restated below:

1. Adopt the OC River Walk Conceptual Master Plan to further enhance and accentuate existing recreational areas, facilitate pedestrian and bicycle access, and promote the use of the river corridor open space area for the community benefit.
2. Implement projects identified in the OC River Walk Conceptual Master Plan that will create visually appealing outdoor public amenities that will benefit and promote environmental and community health, recreation, safety, entertainment, wayfinding, art, education, cultural awareness, beauty, connectivity, water supply, economic, and natural resource needs.
3. Provide seamless and cohesive improvements across jurisdictions on the project site to benefit the public and the area's aesthetics.
4. Implement projects to transform and improve the river and riverbed's groundwater recharge potential and improve the river corridor's ecology (flora and fauna).
5. Maintain and enhance flood protection capacity and resiliency.
6. Enhance connectivity and community access by leveraging the project site's location near ARTIC, major entertainment venues, and adjacent mixed-use developments.

5.3 Alternatives Considered But Rejected

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 effects of the project. The two alternatives listed below were considered but rejected during the scoping/planning process based on one or more of the listed criteria: i) failure to meet most of the basic project objectives, ii) infeasibility, or iii) inability to avoid significant environmental impacts. (CEQA Guidelines, Section 15126.6[c]).

The following section describes alternatives or alternative concepts that were given consideration by the lead agency but rejected from further analysis in the EIR.

5.3.1 Alternative Sites

The project site was selected due to its location adjacent to the Anaheim Regional Transportation Intermodal Center (ARTIC), a local and regional transportation hub providing rail, bus, taxi, and other services for daily commuters and visitors, and two major sports and entertainment venues, Honda Center and Angel Stadium of Anaheim. The project site is also located adjacent to and integrated with the existing City of Orange Stadium Promenade and the OCVIBE Entertainment District, which is currently being developed adjacent to the Honda Center. OCVIBE is a 100-acre

master planned campus currently under development around the Honda Center with shopping, dining, sports, entertainment, open space, apartments, offices, and parking. By locating the OC River Walk project in this highly visited area near high quality transit, the trail and bridge improvements have the greatest potential to promote alternative modes and transportation and reduce regional vehicle miles travelled (VMT). Locating the project in another location would reduce the VMT benefits and increase regional air quality and greenhouse gas emissions. Therefore, an Alternative Site would not reduce environmental impacts.

Another key factor in selection of the project site is the location of the Orange County Water District Groundwater Replenishment System (GWRS) Turnout Structure near the northwest corner of the project site, which will be the source of water for groundwater recharge in the Santa Ana River. Moving the project to another location would not have a source of GWRS water and would not allow for groundwater replenishment, which is a major objective of the project. For these reasons, Alternative Sites have been rejected from further consideration.

5.3.2 No Impoundment Alternative

This Alternative would not include the proposed impoundment structures which are part of the Group A improvements (refer to Chapter 2 for descriptions of the project elements included in each group). All other components of the project would remain the same. Without the impoundments, this Alternative would not allow for groundwater replenishment using GWRS water, which is a major objective of the project. For these reasons, the No Impoundment Alternative has been rejected from further consideration.

5.4 Analysis of Project Alternatives Selected for Evaluation

The following alternatives are analyzed in this chapter:

- **Alternative 1:** No Project/No Improvements Alternative
- **Alternative 2:** Group A and C Impoundments and Trails Alternative

These alternatives were determined to adequately represent the range of feasible alternatives required under CEQA for the project. The No Project/No Improvements Alternative is included, as required by CEQA Guidelines, Section 15126.6(e), even though it would not meet the basic project objectives. Alternative 2 is a reduced scope option that could potentially meet some of the lead agency's objectives.

Detailed descriptions of the alternatives are presented below, along with an evaluation of their environmental impacts.

5.4.1 Alternative 1: No Project/No Improvements Alternative

The discussion of the No Project Alternative must examine the existing conditions and reasonably foreseeable future conditions that would exist if the project were not approved (CEQA Guidelines, Section 15126.6[e]). The No Project/No Improvements Alternative is defined as a continuation of existing conditions and conditions that are reasonably expected to occur in the event that the project is not implemented. Under the No Project/No Improvements Alternative, none of the Group A, B, C, or D improvements would occur. Although this Alternative would avoid potential short-term, construction-related impacts, none of the long-term benefits of the project (e.g., trail improvements, groundwater recharge, open space restoration, enhanced community access, recreational opportunities, infrastructure improvements, etc.) would be realized. As a result, under this Alternative none of the Conceptual Master Plan Elements, as illustrated on Figures 2-8a through 2-8d, would occur, including Group A – Impoundments, Storm Drain Diversions, and Embankments; Group B – New Pedestrian/Bike Bridges; Group C – New Trails and Trail Improvements; and Group D – Enhanced Community Amenities.

Impact Analysis

5.4.1.1 Air Quality

Without the project, construction-related emissions, including dust, vehicle exhaust, and equipment emissions, would not occur. However, existing conditions would remain unchanged, meaning there would be no improvements to air quality through potential project-related emission reduction strategies such as increased vegetation or decreased reliance on motorized transport. Therefore, it is expected that temporary construction air quality impacts would be reduced compared to the project, and long-term operational air quality impacts would increase compared to the project.

5.4.1.2 Biological Resources

The no-project scenario would avoid potential temporary disturbances to local habitats caused by construction. However, without the project habitat restoration or enhancement efforts that could improve conditions for local species would also not occur. Sensitive species and wetlands within the project area would remain as they currently are, without additional beneficial improvements on biological resources. Therefore, it is expected that temporary construction biological resources impacts would be reduced compared to the project, and long-term operational benefits to biological resources would not occur.

5.4.1.3 Cultural Resources

By not proceeding with development, there would be no risk of disturbing potential archaeological or historic resources. Therefore, it is estimated that the No Project/No Improvement Alternative would have decreased impacts related to cultural resources compared to the project.

5.4.1.4 Geology and Soils

No grading, excavation, or land modification would take place, eliminating risks associated with soil erosion and stability issues from construction.

5.4.1.5 Greenhouse Gas Emissions

Without the project, construction-related greenhouse gas (GHG) emissions, including equipment emissions, would not occur. However, existing conditions would remain unchanged, meaning there would be no improvements to GHG emissions through potential project-related emission reduction strategies such as increased vegetation or decreased reliance on motorized transport. Therefore, it is expected that temporary construction air quality impacts would be reduced compared to the project, and long-term operational GHG impacts would increase compared to the project.

5.4.1.6 Hazards and Hazardous Materials

Because no changes would occur under the No Project/No Improvement Alternative, no new hazards would be introduced to the project site. Project impacts were determined to be less than significant related to hazards and hazardous materials, including those associated with the routine transportation, storage, and use of common household chemicals during the operation of the project. However, this alternative would reduce the project's less than significant impacts related to hazards and hazardous materials because no soils would be disturbed.

5.4.1.7 Hydrology and Water Quality

Under the No Project/No Improvement Alternative, existing hydrology patterns and characteristics of the project site and water quality conditions would remain unchanged. The project would result in minor increases in impervious surfaces, which would increase the amount of storm water runoff from the project site. These impacts—which would be less than significant for the project through compliance with existing regulatory requirements—would be avoided under the No Project/No Improvement Alternative. Water quality impacts, including erosion and sedimentation, would be greater under this alternative because the project site would not receive the benefits from the stormwater drainage and water quality filtration features that would be constructed as part of the project. Accordingly, this alternative would result in greater impacts associated with hydrology and water quality when compared to the project.

5.4.1.8 Noise

The No Project/No Improvement Alternative would not involve any grading or construction activities. Therefore, noise and vibration effects associated with these construction activities would not occur under this alternative. However, the construction-related noise impacts from the project would be less than significant. The increase in long-term, traffic-related, and operational noise

levels associated with the project are minimal and no significant noise impacts would occur. Therefore, this alternative would result in no impact related to noise.

5.4.1.9 Transportation

The No Project/No Improvement Alternative would not change the existing circulation conditions because no new activities would occur at the project site. No long-term (operational) vehicular trips would be generated under the No Project/No Development Alternative. However, under this alternative, the trail and bridge improvements, and associated VMT reductions would not occur. Therefore, long-term VMT impacts would be greater under the No Project/No Improvement Alternative.

5.4.1.10 Tribal Cultural Resources

By not proceeding with development, there would be no risk of disturbing potential tribal cultural resources. Therefore, it is expected that the No Project/No Improvement Alternative would have reduced impacts related to tribal cultural resources compared to the project.

5.4.1.11 Avoid or Substantially Lessen the Significant Impacts of the Project

The No Project/No Improvement Alternative would avoid some of the short-term construction related impacts. Because no changes would occur under the No Project/No Improvement Alternative, less than significant impacts potentially resulting from the project for the following environmental topics would be avoided: aesthetics, air quality, biological resources, cultural resources, geology and soils, hazards and hazardous materials, and tribal cultural resources. However, as discussed above, the long-term VMT, air quality, and GHG impacts would be greater under the No Project/No Improvement Alternative. Additionally, this alternative would not attain any of the Project Objectives established for the project.

5.4.1.12 Ability to Meet Project Objectives

The No Project/No Improvement Alternative would not involve any changes within the project site. This alternative would not attain any of the Project Objectives identified above in Section 5.2, Project Objectives, including environmental benefits related to trail improvements, groundwater recharge, and open space restoration. Additional benefits of the project, such as enhanced community access, recreational opportunities, wildlife and habitat benefits, and infrastructure improvements, would not occur.

5.4.2 Alternative 2: Group A and C Impoundments and Trails Alternative

Under the Group A and C Impoundments and Trails Alternative, none of the Group B or D improvements would occur. As a result, the Group B – New Pedestrian/Bike Bridges and Group D – Enhanced Community Amenities would not occur. Group B includes two new pedestrian/bike bridges, and Group D includes park and open space along the east bank and in Lot B on the west

side. Although this Alternative would reduce some potential short-term, construction-related impacts, some of the long-term benefits of the project would not be realized. Specifically, the elimination of new pedestrian and bike bridges would reduce some of the VMT, air quality, and GHG benefits associated with the project. This alternative would eliminate park and open space with the potential for habitat restoration or enhancement efforts; therefore, it would reduce some of the biological resource benefits that could have been achieved through project implementation.

Impact Analysis

5.4.2.1 Air Quality

Under Alternative 2, construction-related emissions, including dust, vehicle exhaust, and equipment emissions, would be reduced. However, the elimination of new pedestrian and bike bridges would reduce some of the air quality benefits associated with the project. Therefore, it is expected that temporary construction air quality impacts would be reduced compared to the project, and long-term operational air quality impacts would increase compared to the project.

5.4.2.2 Biological Resources

Under Alternative 2, potential temporary disturbances to local habitats caused by construction would still occur but to a lesser extent because the east bank area would not be disturbed. With implementation of the impoundments, potential habitat restoration or enhancement efforts that could improve conditions for local species could occur similar to the project. But this alternative would also eliminate some park and open space areas within the project site with the potential for habitat restoration and enhancement; therefore, it would reduce some of the biological resource benefits that could have been achieved through project implementation. Therefore, it is expected that impacts to biological resources would be similar under this alternative.

5.4.2.3 Cultural Resources

Under this alternative, the primary project components would still be implemented. Therefore, it is estimated that Alternative 2 would have similar impacts related to cultural resources compared to the project.

5.4.2.4 Geology and Soils

Alternative 2 would involve a similar construction impact area as the project. Therefore, this alternative would result in similar potential impacts related to geology and soils and seismic hazards as the project. With adherence to applicable building codes and incorporation of the recommendations from the site-specific geotechnical studies, the project would not expose people or structures to substantial safety risks associated with geologic hazards. Therefore, with incorporation of mitigation measures, and adherence to applicable regulations, geology and soils impacts would be less than significant with implementation of Alternative 2 and the project.

5.4.2.5 Greenhouse Gas Emissions

Under Alternative 2, construction-related emissions related to the bridges, including dust, vehicle exhaust, and equipment emissions, would be avoided. However, the elimination of new pedestrian and bike bridges would reduce some of the VMT and GHG benefits associated with the project. Therefore, it is expected that temporary construction GHG impacts would be reduced compared to the project, and long-term operational air quality impacts would increase compared to the project.

5.4.2.6 Hazards and Hazardous Materials

Neither implementation of Alternative 2 nor the project would result in a significant impact related to hazards or hazardous materials. Alternative 2 would involve a similar construction impact area as the project. Therefore, this alternative would result in similar potential impacts related to hazards and hazardous materials as the project.

5.4.2.7 Hydrology and Water Quality

Alternative 2 would involve development of the same area that would occur with implementation of the project. Therefore, this alternative would result in similar impacts related to hydrology and water quality as the project. Similar to the project, development under this alternative would slightly increase the amount of storm water runoff due to the increase in the amount of impervious surfaces. As with the project, application of Best Management Practices (BMPs) and other regulatory requirements would ensure that impacts to hydrology and storm drain infrastructure are less than significant. An on-site storm drain system would be constructed to detain flows such that they are released from the site at near pre-development levels and would not result in impacts to storm drain facilities or flooding. As with the project, with the incorporation of applicable regulatory requirements, Alternative 2 would have similar, less than significant impacts as the project related to hydrology and flooding.

5.4.2.8 Noise

Under this alternative, the primary project components would still be implemented. Therefore, it is expected that Alternative 2 would have similar impacts related to noise compared to the project. However, elimination of the bridges would slightly reduce potential construction noise.

5.4.2.9 Transportation

The elimination of new pedestrian and bike bridges would reduce some of the VMT, air quality, and GHG benefits associated with the project. Therefore, it is estimated that long-term operational VMT impacts would slightly increase compared to the project.

5.4.2.10 Tribal Cultural Resources

Under this alternative, the primary project components would still be implemented. Therefore, it is expected that Alternative 2 would have similar impacts related to tribal cultural resources compared to the project.

5.4.2.11 Avoid or Substantially Lessen the Significant Impacts of the Project

The Group A and C Impoundments and Trails Alternative would reduce some of the short-term construction-related impacts. Because no bridges would occur under Alternative 2, less than significant impacts resulting from the project for construction noise would be reduced. Although the area of disturbance would decrease under this alternative, some of park and open space improvements with potential habitat restoration would not occur, which would have a beneficial impact on the biological resources after construction. This alternative is considered to have similar impacts related to biological resources. As discussed above, the long-term VMT, air quality, and GHG impacts would be slightly greater under Alternative 2.

5.4.2.12 Ability to Meet Project Objectives

The Group A and C Impoundments and Trails Alternative achieves most of the Project Objectives identified above in Section 5.2, including environmental benefits related to trail improvements in groundwater recharge. However, without the bridges, some of the VMT reduction benefits would not occur to the same extent as the full project. This alternative would only partially meet the project objectives and only partially achieve the associated benefits.

5.5 Environmentally Superior Alternative

An EIR is required to identify the environmentally superior alternative, the alternative having the potential for the fewest environmental impacts, from among the range of reasonable alternatives that are evaluated. Of the alternatives analyzed, the environmentally superior alternative is Alternative 2: Group A and C Impoundments and Trails Alternative. As suggested in the CEQA Guidelines, Section 25126.6(d), a matrix summarizing and comparing the impacts of the project alternatives with those of the project is in Table 5-1, Comparison of Potentially Significant Impacts for Alternatives to the Project.

Table 5-1. Comparison of Potentially Significant Impacts for Alternatives to the Project

Issue Area	Project	Alternatives	
		Alternative 1: No Project	Alternative 2: Group A and C Impoundments and Trails Alternative
Section 4.1, Air Quality	LTS	<	<
Section 4.2, Biological Resources	LTSM	<	=
Section 4.3, Cultural Resources	LTS	<	=
Section 4.4, Geology and Soils	LTS	<	<
Section 4.5, Greenhouse Gas Emissions	LTS	>	>
Section 4.6, Hazards and Hazardous Materials	LTS	<	=
Section 4.7, Hydrology and Water Quality	LTS	>	=
Section 4.8, Noise	LTSM	<	<
Section 4.9, Transportation	LTS	>	>
Section 4.10, Tribal Cultural Resources	LTSM	<	=

Notes: LTS = Less than significant; LTSM = Less than significant with mitigation; "<" = less than the project; ">" = greater than the project; "=" = similar to the project