

8. *Alternatives*

8.1 INTRODUCTION

8.1.1 Purpose and Scope

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

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

- The discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project 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 a ‘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” (15126.6(f)).
- “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)(1)).
- 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)).
- “An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative” (15126.6(f)(3)).

For each development alternative, this analysis:

- Describes the alternative.
- Analyzes the impact of the alternative as compared to the proposed project.
- Identifies the impacts of the project which would be avoided or lessened by the alternative.
- Assesses whether the alternative would meet most of the basic project objectives.
- Evaluates the comparative merits of the alternative and the project.



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Per the CEQA Guidelines Section 15126.6(d), additional significant effects of the alternatives are discussed in less detail than the significant effects of the project as proposed.

8.1.2 Project Objectives

As described in Section 4.2, the following objectives have been established for the proposed project and will aid decision makers in their review of the project, the project alternatives, and associated environmental impacts:

- Provide a comprehensive update to the City's General Plan and Zoning Code Update to deal more effectively with contemporary issues facing the City of Anaheim.
- Provide for a wide range of housing opportunities in close proximity to existing and future employment centers, and transportation facilities, consistent with the need identified within the City's Housing Element and local and regional jobs/housing balance policies.
- Preserve single-family residential neighborhoods by discouraging further development of multiple-family land uses in such areas.
- Provide for the development of the Mountain Park Area as a quality residential neighborhood.
- Concentrate and enhance commercial uses in strategic locations, primarily at the City's major intersections.
- Identify potential locations for enhanced entryways into neighborhoods and gateways into the City.
- Revitalize neighborhood edges by converting underutilized mid-block commercial uses to housing opportunities and/or community amenities.
- Expand park, open space and recreational opportunities within the City.
- Intensify the development potential of The Platinum Triangle.
- Create a pedestrian-friendly, active Downtown that reflects the historic character of the Anaheim Colony.
- Create gathering places where residents, employees, and visitors can interact, socialize and recreate.
- Update the City's Land Use Map to reflect more accurate data provided by a parcel-based GIS mapping system.

8.2 ALTERNATIVES CONSIDERED AND REJECTED DURING THE SCOPING/PROJECT PLANNING PROCESS

The following is a discussion of the land use alternatives considered during the scoping and planning process and the reasons why they were not selected for detailed analysis in this DEIR.

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8.2.1 Alternatives Considered During the General Plan Visioning Process

Three land use alternatives were analyzed during the General Plan Visioning process in order to develop a Recommended Land Use Alternative for the General Plan and Zoning Code Update. These three alternatives were a Trends Alternative, a Vision Alternative, and a Corridors Alternative. The Vision Alternative was generally based on the input gathered through the General Plan and Zoning Code Update public outreach process, much of which was captured through the Anaheim Vision. A variation of the Vision Alternative was ultimately selected as the Recommended Land Use Alternative and is fully analyzed in this DEIR.

The Corridors Alternative did not represent a drastic change from the Vision Alternative. Rather, it modified it by proposing additional land use changes that took advantage of existing and potential transportation linkages throughout the City. Although not ultimately selected as the Recommended Land Use Alternative, the associated environmental impacts associated with this alternative are analyzed in this section below.

The Trends Alternative was based on the existing General Plan Land Use Element Map, but also considered ongoing planning and redevelopment projects and programs that may have necessitated a change in land use from the existing General Plan. Examples of these projects/programs include the West Anaheim Vision Plan, the conversion of industrial uses to various residential uses in the Downtown Area, and the implementation of mixed-use projects in the Downtown Area. In addition, land use redesignations identified through prior Community Planning Program Action Plans were also reflected.

Since the Trends Alternative was not significantly different from the existing General Plan, this alternative reviewed and rejected during the scoping/project planning process. The main reason for rejecting the Trends Alternative was that it was very similar to the No Project/Existing General Plan Alternative, which is analyzed below. In addition, the Trends Alternative did not reduce the significant environmental impacts of the project including air quality, noise, or traffic and circulation.



8.2.2 Alternative Development Areas

CEQA requires that the discussion of alternatives focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project. The key question and first step in the analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR. (Guidelines Sec. 15126(5)(B)(1)) In general, any development of the size and type proposed by the project would have substantially the same impacts on air quality, land use/planning, noise, population/housing, public services, recreation, transportation/traffic and utilities/service systems. Without a site specific analysis, impacts on aesthetics, biological resources, cultural resources, geology/soils, hazards and hazardous materials, hydrology/water quality and mineral resources cannot be evaluated.

Since the proposed project consists of a General Plan and Zoning Code Update, an alternative site analysis is not appropriate. However, areas proposed for development were reviewed to determine if development could be redirected to less sensitive areas. Since the City of Anaheim is predominately built out, there are very few undeveloped areas which remain available for development. The large majority of undeveloped land within the City is located within the Hill and Canyon Area. However, much of this land contains environmentally sensitive biological habitat and is currently protected by the NCCP/HCP for Central/Coastal Subregion, or is owned by the State and is now part of the Chino Hills State Park (i.e., the Cypress Canyon Specific Plan). As a result, shifting development intensities to other

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areas of the City is not feasible and would create greater environmental impacts. As a result, Alternative Development Areas were rejected and are not analyzed in detail in this DEIR.

8.3 ALTERNATIVES SELECTED FOR FURTHER ANALYSIS

Based on the criteria listed above, the following three alternatives have been determined to represent a reasonable range of alternatives which have the potential to feasibly attain most of the basic objectives of the project but which may avoid or substantially lessen any of the significant effects of the project. These alternatives are analyzed in detail in the following sections.

- No-Project/Existing General Plan Alternative
- Corridors Alternative
- Reduced Intensity Alternative

An EIR must identify an "environmentally superior" alternative and where the No Project Alternative is identified as environmentally superior, the EIR is then required to identify as environmentally superior an alternative from among the others evaluated. Each alternative's environmental impacts are compared to the proposed project and determined to be environmentally superior, neutral or inferior. However, only those impacts found significant and unavoidable are used in making the final determination of whether an alternative is environmentally superior or inferior to the proposed project. Only the impacts involving air quality, noise and traffic were found to be significant and unavoidable. Section 8.7 identifies the Environmentally Superior Alternative.

The Recommended Land Use Alternative (proposed General Plan and Zoning Code Update) is analyzed in detail in Chapter 5.0 of this DEIR.

Alternatives Comparison

The following statistical analysis provides a summary of general socioeconomic buildout projections determined by the four land use alternatives, including the proposed project. It is important to note that these are not growth projections. That is, they do not anticipate what is likely to occur by a certain time horizon, but rather provide a buildout scenario that would only occur if all of the areas of the City were to develop to the probable capacities yielded by the land use alternatives. The following statistics were developed as a tool to understand better the difference between the alternatives analyzed in the DEIR. Table 8.1-1 identifies City-wide information regarding dwelling unit, population and employment projections, and also provides the jobs to housing ratio for each of the alternatives.

**TABLE 8.1-1
BUILDOUT STATISTICAL SUMMARY**

	<i>Proposed Project</i>	<i>No Project/Existing General Plan Alternative</i>	<i>Corridors Alternative</i>	<i>Reduced Intensity Alternative</i>
Dwelling Units	129,159	126,821	158,211	123,685
Population	403,773	418,509	448,034	390,558
Employment	251,397	237,315	318,926	241,593
Jobs to Housing Ratio	1.95	1.87	2.02	1.95

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8.4 NO-PROJECT/EXISTING GENERAL PLAN ALTERNATIVE

Section 15126.6(e) of the CEQA Guidelines requires that an EIR evaluate and analyze the impacts of the “No-Project” Alternative. When the project is the revision of an existing land use or regulatory plan, policy, or ongoing operation, the no-project alternative will be the continuation of the plan, policy, or operation into the future. Therefore, the No Project/Existing General Plan and Zoning Code Update Alternative, as required by the CEQA Guidelines, analyzes the effects of continued implementation of the City’s existing General Plan and Zoning Code. This alternative assumes the existing General Plan remains as the adopted long-range planning policy document for the City. Development would continue to occur within the City in accordance with the existing General Plan, Zoning Code, and Specific Plans. Buildout pursuant to the existing General Plan would allow current development patterns to remain. The existing General Plan would not allow for mixed-use developments within The Platinum Triangle, including residential units, as envisioned in the proposed General Plan and Zoning Code Update. In addition, current policy would allow more residential development within the Hill and Canyon Area, including more development within the Mountain Park Specific Plan (7,966 dwelling units versus 2,500 dwelling units) and the Cypress Canyon Specific Plan (1,650 dwelling units versus designated open space). The No-Project/Existing General Plan Alternative would provide 2,338 fewer dwelling units, increase population by 14,736 persons, and provide 14,082 fewer jobs within the City at buildout, as compared to the proposed General Plan and Zoning Code Update.

8.4.1 Aesthetics

Under the No-Project/Existing General Plan Alternative, the City would continue to function under the direction of the existing General Plan and Zoning Code Update. Buildout under the existing General Plan would result in 14,082 fewer jobs, 2,338 fewer dwelling units and 14,736 more residents than the proposed project. Increased levels of development would be required to provide housing and infrastructure for the increased population.

Under the existing General Plan, there are few policies that regulate aesthetics. The only significant policies are the Scenic Highways Element and the Scenic Corridor Overlay Zone (SC), which set out policies and regulations to preserve scenic resources along designated State scenic routes and in the Hill and Canyon Area. The Land Use Element, Open Space Element and Parks, Recreation and Community Services Element of 1992 set out policies on preserving open space resources, low-density development in the Hill and Canyon Area, and well-planned recreational facilities throughout the City. However, because there is no separate Community Design Element and related policies, issues of community identity and aesthetics are not addressed, and therefore would not be incorporated into new development projects.

Under this Alternative, a greater number of units would be constructed in the Hill and Canyon Area of the City. Since this area is currently undeveloped vacant land containing landforms of both regional and local significance viewed from both State highways and future roadways, it is assumed that this alternative would have a more significant impact on aesthetics than the Recommended Land Use Alternative, which would allow for fewer units, more open space land, and include mitigation that specifically addresses aesthetic issues within the City. Therefore the No-Project/Existing General Plan Alternative would be considered the environmentally inferior alternative regarding aesthetics.

8.4.2 Air Quality

Under the No-Project/Existing General Plan Alternative, the City would continue to function under the direction of the existing General Plan. Buildout under the existing General Plan would result in 14,082 fewer jobs, 2,338 fewer dwelling units and 14,736 more residents than buildout under the Recommended



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Land Use Alternative. The reductions in dwelling units and employment would reduce traffic volumes on a City-wide basis. However, development of additional units in the Hill and Canyon Area and fewer units located within The Platinum Triangle would increase commute distances, associated vehicle miles traveled, and air emissions within the South Coast Air Basin. Location of housing units away from regional employment centers is contrary to SCAG and SCAQMD jobs/housing balance policies. Therefore, the No-Project/Existing General Plan Alternative is considered environmentally inferior to the Recommended Land Use Alternative.

8.4.3 Biological Impacts

Under the No-Project/Existing General Plan Alternative, the City would continue to function under the direction of the existing General Plan. Since most portions of the City are already developed, the undeveloped Hill and Canyon Area including the Mountain Park Area, contains the last remaining area where significant biological resources are found. Because the existing General Plan Land Use Map designates the Cypress Canyon Specific Plan area and a larger portion of the Mountain Park Specific Plan Area for urban uses than the Recommended Land Use Alternative, the No-Project/Existing General Plan Alternative has the potential for more significant impacts to biological resources and therefore, would be considered environmentally inferior to the Recommended Land Use Alternative.

8.4.4 Cultural Resources

Under the No-Project/Existing General Plan Alternative, the City would continue to function under the direction of the existing General Plan. This Alternative could have a potentially significant impact on Cultural Resources because the existing General Plan does not currently contain policies supporting historic preservation and design guidelines in the Colony area where a majority of the City's historic resources exist. Since the existing General Plan does not contain a Community Design Element, this Alternative does not give the City the policy guidance regarding new development, which could affect historic resources. In addition, there would not be the impetus to initiate additional measures to preserve historic areas. Furthermore, the existing General Plan does not contain design policies and guidelines related to incorporating historic themes in the revitalization of the Downtown. The proposed General Plan and Zoning Code Update addresses all of these issues, which would serve to mitigate impacts on cultural resources.

The majority of the archaeological and paleontological resources are located within the undeveloped Hill and Canyon Area of the City. Because the existing General Plan Land Use Map designates the Cypress Canyon Specific Plan area and a larger portion of the Mountain Park Specific Plan Area for urban uses than the Recommended Land Use Alternative, which could have a potentially significant impact on cultural resources found within this area. Therefore, the No-Project/Existing General Plan Alternative is considered environmentally inferior to the proposed project with regard to cultural resources.

8.4.5 Geology and Soils

Under the No-Project/Existing General Plan Alternative, the City would continue to function under the direction of the existing General Plan. Buildout under the existing General Plan would result in 14,082 fewer jobs, 2,338 fewer dwelling units and 14,736 more residents than buildout under the Recommended Land Use Alternative. The greater number of people anticipated under this Alternative would expose a greater number of people to impacts related to geology and soils. Furthermore, the existing General Plan Land Use Map designates the Cypress Canyon Specific Plan area and a larger portion of the Mountain Park Specific Plan Area for urban uses than the Recommended Land Use Alternative, thus increasing exposure to potential geologic and soils impacts such as earthquake related liquefaction, landsliding, ground shaking, and erosion in this undeveloped portion of the City. Therefore, the No-

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Project/Existing General Plan Alternative is considered environmentally inferior to the proposed project with regard to geology and soils.

8.4.6 Hazards and Hazardous Materials

Under the No-Project/Existing General Plan Alternative, the City would continue to function under the direction of the existing General Plan. Buildout under the existing General Plan would result in 14,082 fewer jobs, 2,338 fewer dwelling units and 14,736 more residents than buildout under the Recommended Land Use Alternative. Under the Recommended Land Use Alternative, mixed use residential uses would be allowed within The Platinum Triangle, which predominately consists of industrial and office uses. The heavy industrial uses currently allowed would be phased out over time and replaced with light industrial or in some cases residential uses. Downgrading from heavy industrial to light industrial uses would result in less direct exposure of the population to potential hazards and hazardous materials. However, there is a greater potential for conflict between residential and industrial land uses under the Recommended Land Use Alternative. Therefore, the No-Project/Existing General Plan Alternative is considered environmentally superior to the proposed project with regards to hazards and hazardous materials.

8.4.7 Hydrology and Water Quality

Under the No-Project/Existing General Plan Alternative, the City would continue to function under the direction of the existing General Plan. Buildout under the existing General Plan would result in 14,082 fewer jobs and 14,736 more residents than buildout under the Recommended Land Use Alternative. Although the existing General Plan currently discusses issues related to water and hydrology, the existing General Plan contains only general discussions and does not contain policies that specifically target the prevention or reduction of urban runoff or water pollution. With increased levels of population and development anticipated under the No-Project/Existing General Plan Alternative, increased levels of water pollution and urban runoff would result. In addition, the existing General Plan assumes a greater number of acreage would be developed in the Hill and Canyon Area. Therefore, fewer recharge areas would exist on total runoff would be increased. Therefore, the No-Project/Existing General Plan Alternative is environmentally inferior to the Recommended Land Use Alternative.



8.4.8 Land Use and Relevant Planning

Under this alternative the City would continue to function under the direction of the existing General Plan and General Plan Land Use Map. Under the Recommended Land Use Alternative, mixed use residential uses would be allowed within The Platinum Triangle, which predominately consists of industrial and office uses. The heavy industrial uses currently allowed would be phased out over time and replaced with light industrial or in some cases residential uses. However, there is a greater potential for conflict between residential and industrial land uses under the Recommended Land Use Alternative. Therefore, the No-Project/Existing General Plan Alternative is considered environmentally superior to the proposed project with regards to hazards and hazardous materials.

8.4.9 Mineral Resources

Under the No-Project/Existing General Plan Alternative, the City would continue to function under the direction of the existing General Plan. Currently, the existing General Plan Land Use Map does not designate any sites within the City for mineral resources extraction, although three such sites within the City are classified as sites containing mineral resources of Statewide Significance. The Recommended Land Use Alternative does not designate these sites for mineral extraction purposes, because they have already been developed. Since these mineral resource sites have already been developed, potential

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impacts are generally the same. Therefore, the No-Project/Existing General Plan Alternative is not considered environmentally superior to the Recommended Land Use Alternative.

8.4.10 Noise

Under this Alternative, the City would continue to function under the direction of the existing General Plan Noise Element. Buildout under the existing General Plan would result in 14,082 fewer jobs, 2,338 fewer housing units and 14,736 more residents than the proposed project. Automobiles from outside the City would use the local freeways, impacting land uses in the City adjacent to these freeways with traffic noise. Helicopter and aircraft flying through the City would also generate noise that impacts existing land uses in the City.

As a result of reductions in the number of dwelling units and employment, traffic volumes throughout the City would be slightly less on a City-wide basis. Due to the reduction in associated traffic volumes, the No-Project/Existing General Plan Alternative would reduce the noise volumes from adjacent arterials within the City. Due to reduced development activity, temporary short-term construction noise impacts associated with the proposed project would also be reduced under the No-Project/Existing General Plan Alternative. However, development of additional units in the Hill and Canyon Area and fewer units located within The Platinum Triangle would discourage alternative forms of transportation and increase commute distances and associated vehicle miles traveled on area roadways. Therefore, the No-Project/Existing General Plan Alternative impacts are considered inferior to the proposed project.

8.4.11 Police and Fire

Under the No-Project/Existing General Plan Alternative, the City would continue to function under the direction of the existing General Plan. Buildout under the existing General Plan would result in 14,082 fewer jobs, 2,338 fewer dwelling units and 14,736 more residents than buildout under the Recommended Land Use Alternative. The higher level of population growth projected in the existing General Plan would result in greater impacts to the Police and Fire Departments in their efforts to adequately serve a greater number of people than under the Recommended Land Use Alternative. Therefore, the No-Project/Existing General Plan Alternative is considered environmentally inferior to the Recommended Land Use Alternative.

8.4.12 Population and Housing

Under the No-Project/Existing General Plan Alternative, the City would continue to function under the direction of the existing General Plan and General Plan Land Use Map. Buildout under the existing General Plan would result in 14,082 fewer jobs, 14,736 more residents, and 2,338 fewer dwelling units than buildout conditions under the Recommended Land Use Alternative. However, the benefits of providing additional housing in a job rich area would be less under this alternative than the proposed project. The No-Project/Existing General Plan Alternative would provide more single-family units in the Hill and Canyon Area and fewer units near regional employment centers. By comparison, the proposed project allows for the development of a wide-range of housing opportunities in close proximity to regional employment and activity centers in The Platinum Triangle and the Downtown Area. Therefore, the No-Project/Existing General Plan Alternative is not considered environmentally superior to the proposed project.

8.4.13 Public Services and Facilities

Under the No-Project/Existing General Plan Alternative, the existing General Plan is expected to result in 14,736 residents, 2,338 fewer dwelling units, and 14,082 fewer jobs than the Recommended Land Use

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Alternative. The higher level of population growth projected in the existing General Plan would result in greater impacts to the public services and facilities in the City to adequately serve a greater number of people than under the Recommended Land Use Alternative. Therefore, the No-Project/Existing General Plan Alternative is considered environmentally inferior to the Recommended Land Use Alternative.

8.4.14 Recreation

Under the No-Project/Existing General Plan Alternative, the City would continue to function under the direction of the existing General Plan. Due to the higher level of population predicted under buildout conditions of this Alternative, the demands on existing recreational facilities would be increased. As a result, a greater amount of parkland would be required to serve the projected population. Therefore, the No-Project/Existing General Plan Alternative is not considered environmentally superior to the proposed project.

8.4.15 Transportation and Circulation

Under this Alternative, the City would continue to function under the direction of the existing General Plan, including the existing Circulation Element. Buildout under the existing General Plan would result in 14,082 fewer jobs and 14,736 more residents than buildout under the Recommended Land Use Alternative. Due to reductions in the number of dwelling units and employment, overall traffic volumes within the City would be decreased. However, development of additional units in the Hill and Canyon Area and fewer units located within The Platinum Triangle would increase commute distances and associated vehicle miles traveled. In addition, development of additional units in the Hill and Canyon Area and fewer units located within The Platinum Triangle would discourage alternative forms of transportation. Therefore, the No-Project/Existing General Plan Alternative is not considered environmentally superior to the Recommended Land Use Alternative.

8.4.16 Conclusion

The No-Project/Existing General Plan Alternative would not be considered environmentally superior to the Recommended Land Use Alternative (proposed project) in the areas of aesthetics, air quality, biological impacts, cultural resources, geology and soils, hydrology and water quality, mineral resources, noise, police and fire, population and housing, recreation, and transportation and traffic.

The adoption of the No-Project/Existing General Plan Alternative would leave the City open for future growth that may not be compatible with the goals and objectives of the City. In addition, such growth would not be comparable in quality with the development under the Recommended Land Use Alternative. The No-Project/Existing General Plan Alternative fails to accomplish the project objectives in the City's vision and has other potential environmental impacts resulting from its implementation. Specifically, the No-Project/Existing General Plan Alternative does not protect open space resources in the Hill and Canyon Area and does not locate a wide-range of housing opportunities in close proximity to regional employment and activity centers. The No-Project/Existing General Plan Alternative is, therefore, not considered environmentally superior to the Recommended Land Use Alternative (proposed project).

8.5 CORRIDORS ALTERNATIVE

The Corridors Alternative does not represent a drastic change from the Recommended Land Use Alternative in terms of the goals and policies that would be defined through the General Plan and Zoning Code Update. This Alternative would take advantage of existing and potential transportation linkages throughout the City by assuming that four major transit routes for Bus Rapid Transit (BRT) would be established to traverse portions of the City. The first, located along the entire length of La Palma Avenue,



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would connect the Hill and Canyon Area and The Canyon to the North Central Industrial Area and West Anaheim. In addition, this Alternative assumes another major east-west transit route along Katella Avenue, and two north-south routes along Beach Boulevard and Harbor Boulevard. This Alternative would provide an additional 29,052 dwelling units, increase population by 44,261 persons, and provide 67,529 additional jobs within the City at buildout, as compared to the proposed General Plan and Zoning Code Update. The additional units, population, and employment are related to the potential for increased mixed use opportunities along transit routes.

8.5.1 Aesthetics

The Corridors Alternative would intensify land uses at strategic locations along four major transportation routes through the City. Assuming that the goals, policies and action items from the Recommended Land Use Alternative would be incorporated through the implementation of this Alternative, this Alternative demonstrates sufficient mitigation of aesthetic impacts. This assumes that the land use improvements envisioned by this Alternative would include corridor and arterial streetscape improvement programs established by the City and would incorporate the mitigation measures from the Community Design Element, despite the addition of 31,541 dwelling units, 44,261 people and 67,529 jobs in the City. Therefore, the Corridors Alternative is generally similar to the Recommended Land Use Alternative although land uses would be intensified along some transportation corridors.

8.5.2 Air Quality

Under the Corridors Alternative, the City's development would be focused on the transportation corridors of the City, taking advantage of potential transportation linkages, including the proposed Bus Rapid Transit system. Buildout under this Alternative would result in an additional 29,052 dwelling units, an additional 41,289 population, and an additional 67,529 jobs than under the buildout of the Recommended Land Use Alternative. Due to the greater intensity of this Alternative than the Recommended Land Use Alternative, greater air quality impacts would be generated. Therefore, the Corridors Alternative is considered environmentally inferior to the proposed project.

8.5.3 Biological Impacts

Under the Corridors Alternative, the City's development would be focused on the transportation corridors of the City, taking advantage of potential transportation linkages, including the proposed Bus Rapid Transit system. Buildout under this Alternative would result in an additional 29,052 dwelling units, an additional 41,289 population, and an additional 67,529 jobs than under the buildout of the Recommended Land Use Alternative. The higher level of intensity of this Alternative compared to the Recommended Land Use Alternative would potentially impact sensitive biological resources within the City indirectly, through increased amounts of light, air emissions, noise, runoff, etc. This would be especially evident in the Hill and Canyon Area, the least developed area of the City, which would see increased levels of development under this Alternative to accommodate 29,052 additional dwelling units. In this area, this additional development would support the biological resources in the area to a greater extent than the Recommended Land Use Alternative. Therefore, the Corridors Alternative is considered environmentally inferior to the proposed project.

8.5.4 Cultural Resources

Under the Corridors Alternative, the City's development would be focused on the transportation corridors of the City, taking advantage of potential transportation linkages. Buildout under this Alternative would result in an additional 29,052 dwelling units, an additional 41,289 population, and an additional 67,529 jobs than under the buildout of the Recommended Land Use Alternative. Increased levels of

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development intensity associated with the increased numbers of dwelling units, population and housing could significantly impact cultural resources within the City, particularly in the Colony and Hill and Canyon Areas of the City, where the majority of the City's cultural resources exist. Therefore, the Corridors Alternative is considered environmentally inferior to the proposed project.

8.5.5 *Geology and Soils*

The Corridors Alternative would involve more intense development opportunities, due to the additional 29,052 dwelling units, 41,289 people and 67,529 jobs under this alternative, as compared to the Recommended Land Use Alternative. The increased levels of development could lead to increased erosion, contamination of soils and increased exposure of people and structures to geologic hazards such as earthquakes and landslides. Although General Plan Goals and Policies developed in conjunction with this Alternative would be similar to those developed in conjunction with the Recommended Land Use Alternative, the increased intensity of development would expose a greater number of people and structures to geologic hazards than the Recommended Land Use Alternative. Therefore, the Corridors Alternative is considered environmentally inferior to the proposed project.

8.5.6 *Hazards and Hazardous Materials*

The Corridors Alternative would involve more intense development opportunities resulting in 29,052 dwelling units, 41,289 people and 67,529 jobs more than buildout of the Recommended Land Use Alternative. Although General Plan Goals and Policies developed in conjunction with this Alternative would be similar to those developed in conjunction with the Recommended Land Use Alternative, the increased intensity of development, particularly, in industrial areas, would expose a greater number of people and structures to hazards and hazardous materials than under the Recommended Land Use Alternative. Therefore, the Corridors Alternative is considered environmentally inferior to the proposed project.



8.5.7 *Hydrology and Water Quality*

The Corridors Alternative would involve more intense development opportunities resulting in 29,052 dwelling units, 41,289 people and 67,529 jobs more than buildout of the Recommended Land Use Alternative. Although General Plan Goals and Policies developed in conjunction with this Alternative would be similar to those developed in conjunction with the Recommended Land Use Alternative, the more intense level of development under this Alternative as compared to the Recommended Land Use Alternative would result in increased levels of water pollution and urban runoff. Therefore, the Corridors Alternative is considered environmentally inferior to the proposed project.

8.5.8 *Land Use and Relevant Planning*

Under the Corridors Alternative, the City's development would be focused on the transportation corridors of the City, taking advantage of potential transportation linkages, including the proposed Bus Rapid Transit system. Although land use patterns in the Corridors Alternative are more conducive to transit ridership with greater concentrations of development along transportation linkages, the buildout projections for this Alternative are significantly greater. The Corridors Alternative would result in an additional 29,052 dwelling units, an additional 41,289 population, and an additional 67,529 jobs than under the buildout of the Recommended Land Use Alternative. Although General Plan Goals and Policies developed in conjunction with this Alternative would be similar to those developed in conjunction with the Recommended Land Use Alternative, the land use plan under this Alternative involves a higher intensity of development throughout the City that could potentially create impacts in

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other areas, such as air quality, water quality, noise, public utilities and services, and traffic. Therefore, the Corridors Alternative would be considered environmentally inferior to the proposed project

8.5.9 Mineral Resources

Under the Corridors Alternative, the City's development would be focused on the transportation corridors of the City, taking advantage of potential transportation linkages, including the proposed Bus Rapid Transit. Although three sites within the City are recognized by the State of California as containing a mineral resource of Statewide Significance, the Land Use Plan associated with this Alternative would not designate any of these sites for mineral resource extraction because none of these sites are currently used for mineral resource extraction. However, the Green Element of the General Plan and Zoning Code Update, contains a number of policies regarding the use and preservation of these sites. As with the Recommended Land Use Alternative, development on any of these sites would be required to comply with the Surface Mining and Reclamation Act (SMARA). Therefore, the Corridors Alternative is neither environmentally superior nor inferior to the Recommended Land Use Alternative.

8.5.10 Noise

Under the Corridors Alternative, the City's development would be focused on the transportation corridors of the City taking advantage of potential transportation linkages, including the proposed Bus Rapid Transit system. Buildout under this Alternative would result in an additional 29,052 dwelling units, an additional 41,289 population, and an additional 67,529 jobs than under the buildout of the Recommended Land Use Alternative. Due to the greater intensity of this Alternative as compared to the Recommended Land Use Alternative, particularly along the City's arterial corridors, greater levels of noise would be produced within the City, and a greater portion of its residents would be exposed to noise impacts. Therefore, the Corridors Alternative is considered environmentally inferior to the proposed project.

8.5.11 Police and Fire

The Corridors Alternative would result in the intensification of land uses at strategic locations along four major transportation routes through the City. In addition, buildout under this Alternative would result in an additional 29,052 dwelling units, an additional 41,289 population, and an additional 67,529 jobs over the buildout levels of the Recommended Land Use Alternative. This intensified land use, as compared to the Recommended Land Use Alternative, would place an increased demand on the City's Police and Fire departments and increase the level of service required to these areas due to increased levels of development under buildout conditions, despite the incorporation of goals and policies similar to those contained in the General Plan and Zoning Code Update. Therefore, the Corridors Alternative would be considered environmentally inferior to the proposed project.

8.5.12 Population and Housing

The Corridors Alternative would result in the intensification of land uses at strategic locations along four major transportation routes through the City. In addition, buildout under this Alternative would result in an additional 29,052 dwelling units, an additional 41,289 population, and an additional 67,529 jobs over the buildout levels of the Recommended Land Use Alternative. The land use plan under this alternative involves a higher intensity of development throughout the City that could create potentially significant impacts on population and housing, despite the incorporation of goals and policies similar to those contained in the General Plan and Zoning Code Update. Therefore, the Corridors Alternative would be considered environmentally inferior to the proposed project.

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8.5.13 Public Services and Facilities

The Corridors Alternative would result in the intensification of land uses at strategic locations along four major transportation routes through the City. In addition, buildout under this Alternative would result in an additional 29,052 dwelling units, an additional 41,289 population, and an additional 67,529 jobs over the buildout levels of the Recommended Land Use Alternative. This intensified land use, as compared to the Recommended Land Use Alternative, would place an increased demand on public services and utilities due to increased levels of development under buildout conditions, despite the incorporation of goals and policies similar to those contained in the General Plan and Zoning Code Update. Therefore, the Corridors Alternative would be considered environmentally inferior to the proposed project.

8.5.14 Recreation

The Corridors Alternative would result in the intensification of land uses at strategic locations along four major transportation routes through the City. In addition, buildout under this Alternative would result in an additional 29,052 dwelling units, an additional 41,289 population, and an additional 67,529 jobs over the buildout levels of the Recommended Land Use Alternative. Due to the higher level of population predicted under buildout conditions of this Alternative, the demands on existing recreational facilities would be increased. As a result, a greater amount of parkland would be required to serve the projected population. Therefore, the No-Project/Existing General Plan Alternative is not considered environmentally superior to the proposed project.

8.5.15 Transportation and Traffic

The Corridors Alternative would result in the intensification of land uses at strategic locations along four major transportation routes through the City. In addition, buildout under this Alternative would result in an additional 29,052 dwelling units, an additional 41,289 population, and an additional 67,529 jobs over the buildout levels of the Recommended Land Use Alternative. This intensified land use would place an increased demand on transportation facilities, especially along the proposed transportation corridors, due to increased levels of development under buildout conditions, despite the incorporation of goals and policies similar to those contained in the General Plan and Zoning Code Update. Therefore, the Corridors Alternative would be considered environmentally inferior to the proposed project.



8.5.16 Conclusion

The Corridors Alternative is not considered environmentally superior when compared to the Recommended Land Use Alternative (project) in the areas of air quality, biological impacts, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, land use, noise, police and fire, population and housing, public services and utilities, recreation, and transportation and traffic. This alternative would be neither environmentally superior nor environmentally inferior to the proposed project in the areas of aesthetics and mineral resources.

The Corridors Alternative was an alternative developed en route to developing the Recommended Land Use Alternative, therefore it does not fully accomplish all of the project objectives in the City's Vision and has other potential environmental impacts resulting from its implementation. This alternative is, therefore, not considered environmentally superior to the Recommended Land Use Alternative (project).

8.6 REDUCED INTENSITY ALTERNATIVE

The Reduced Intensity Alternative would reduce the remaining growth potential associated with the proposed General Plan and Zoning Code Update by 20%. The 20% reduction was based on the total

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remaining buildout potential of the proposed General Plan and Zoning Code Update as compared to existing land uses and applied on a City-wide basis. This Alternative would reduce total dwelling units at buildout by 5,474, decrease population at buildout by 13,215 persons, and provide 9,804 fewer jobs at buildout, as compared to the proposed General Plan and Zoning Code Update. Land use designations would remain the same, although allowable intensities would be reduced. Other components of the project, including creation of a Mixed Use Overlay Zone for The Platinum Triangle area, expansion of The Anaheim ~~Resort Resort~~-Specific Plan, and increased open space in the Hill and Canyon Area, would remain the same as the proposed General Plan and Zoning Code Update.

8.6.1 *Aesthetics*

Under this alternative, the aesthetic impacts would be similar to the proposed project. Although the densities would be decreased, the areas proposed for development within the City would be the same. Therefore, aesthetic impacts would be similar to the proposed project although overall intensity would be slightly reduced.

8.6.2 *Air Quality*

The air pollutant emissions generated by the project-related traffic would be reduced by approximately 20% under the Reduced Intensity Alternative. This Alternative would reduce the projected exceedance of the SCAQMD Threshold Criteria for project generated CO, ROG, NOX, and PM10 emissions, although the thresholds would still be exceeded and considered significant. In addition, this alternative would reduce the project's contribution of housing to the job-rich Orange County Subregion, which is inconsistent with the AQMP. It should be noted, however, that any reductions to air pollutant emissions from a reduction in vehicle trips from residential units would be specific to the project area, and not necessarily a regional reduction. Because this alternative greatly reduces the employment-generating uses that are a part of the project, it could have the effect of increasing vehicle trips and vehicle miles traveled because it removes an employment center from an area near transportation corridors and residential areas.

8.6.3 *Biological Impacts*

Under the Reduced Intensity Alternative, development intensities would be decreased throughout the City, although the areas proposed for development would remain unchanged. Therefore, biological impacts would be similar to the proposed project and is not considered environmentally superior to the proposed project.

8.6.4 *Cultural Resources*

Under the Reduced Intensity Alternative, development intensities would be decreased throughout the City, although the areas proposed for development would remain unchanged. Therefore, under this alternative potential impacts on cultural resources would be generally the same as with the proposed project.

8.6.5 *Geology and Soils*

Since this alternative reduces the development intensity and not development area, grading volumes associated with the proposed project would be similar. Development would be concentrated in existing developed areas of the City, rather than the Hill and Canyon Area. As a result, potential geological impacts would be the same as compared to the proposed project.

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8.6.6 Hazards and Hazardous Materials

Under the Reduced Intensity Alternative, mixed use residential uses would still be allowed within The Platinum Triangle, which predominately consists of industrial and office uses. The heavy industrial uses currently allowed would be phased out over time and replaced with light industrial or in some cases residential uses. Downgrading from heavy industrial to light industrial uses would result in less direct exposure of the population to potential hazards and hazardous materials. Therefore, the impacts associated with the Reduced Intensity Alternative would be the same as compared to the proposed project.

8.6.7 Hydrology and Water Quality

Since this alternative reduces the number of units and not development area, hydrology impacts would be similar to the proposed project.

8.6.8 Land Use and Relevant Planning

Under the Reduced Intensity Alternative, residential, commercial, and industrial development throughout the project site would be reduced by approximately 20%. Since the development areas would be generally similar to the proposed project, land use impacts would remain the same.

8.6.9 Mineral Resources

Under the Reduced Intensity Alternative, development intensities would be decreased throughout the City, although the areas proposed for development would remain unchanged. Therefore, under this alternative potential impacts on mineral resources would be generally the same as with the proposed project.

8.6.10 Noise

Construction noise impacts would generally be similar to the proposed project. However, due to the reduction in associated traffic volumes, the Reduced Intensity Alternative would result in slight reductions in the noise volumes on arterials within the City of Anaheim. Therefore, the Reduced Intensity Alternative is considered environmentally superior to the proposed project with regard to noise.

8.6.11 Police and Fire

Under the Reduced Density Intensity, the demand for public services including police and fire would be reduced by approximately 20%. Therefore, the Reduced Intensity Alternative is considered environmentally superior to the proposed project with regard to police and fire.

8.6.12 Population and Housing

Buildout under the Reduced Intensity Alternative would result in 5,474 fewer units, decrease population at buildout by 13,215 persons, and provide 9,804 fewer jobs than buildout conditions under the Recommended Land Use Alternative. However, the benefits of providing additional housing in a job rich area would be less under this alternative than the proposed project. By comparison, the proposed project allows for the development of a wide-range of housing opportunities in close proximity to regional employment and activity centers in The Platinum Triangle and the Downtown Area. The Reduced Intensity Alternative may also impede the City's ability to achieve it's housing goals contained



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in the adopted Housing Element. Therefore, the Reduced Intensity Alternative is not considered environmentally superior to the proposed project.

8.6.13 Public Services and Facilities

Under the Reduced Density Intensity, the demand for public services and facilities including schools, libraries, water, sewer, solid waste, electricity and natural gas would be reduced by approximately 20%. This would reduce the amount of infrastructure necessary to serve future growth in accordance with the proposed General Plan and Zoning Code Update. Therefore, the Reduced Intensity Alternative is considered environmentally superior to the proposed project with regard to police and fire.

8.6.14 Recreation

Buildout under the Reduced Intensity Alternative would result in 5,474 fewer units, decrease population at buildout by 13,215 persons, and provide 9,804 fewer jobs than buildout conditions under the Recommended Land Use Alternative. This would reduce demands on existing recreational facilities by approximately 20%. As a result, less parkland would be required to serve the projected population. Therefore, the Reduced Intensity Alternative would be considered environmentally superior to the proposed project.

8.6.15 Transportation and Traffic

Buildout under the Reduced Intensity Alternative would result in 5,474 fewer units, decrease population at buildout by 13,215 persons, and provide 9,804 fewer jobs than buildout conditions under the Recommended Land Use Alternative. The Reduced Density Alternative would reduce projected traffic growth by approximately 20%. As a result, the Reduced Intensity Alternative would generate fewer vehicle trips and would have fewer traffic-related impacts than the proposed project. Therefore, the Reduced Intensity Alternative would be considered environmentally superior to the proposed project.

8.6.16 Conclusion

This alternative would lessen impacts associated with air quality, noise, police and fire, public services, recreation, and transportation/traffic by approximately 20%. The remaining impacts are generally the same as the proposed project. However, the benefits of providing additional housing in a job rich area would be less under this alternative than the proposed project. By comparison, the proposed project allows for the development of a wide-range of housing opportunities in close proximity to regional employment and activity centers in The Platinum Triangle and the Downtown Area. The Reduced Intensity Alternative may also impede the City's ability to achieve its housing goals contained in the adopted Housing Element. This alternative would meet most but not all of the project objectives as described in Section 4.2 although it would contribute less housing to a jobs rich region. Although the Reduced Density Alternative does not fully achieve all of the City's objectives established for the proposed project, it would reduce many environmental impacts and is considered environmentally superior to the proposed project.

8.7 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires a lead agency to identify the "environmentally superior alternative" and, in cases where the "No-Project" Alternative is environmentally superior to the proposed project, the environmentally superior development alternative must be identified. One alternative has been identified as "environmentally superior" to the proposed project:

- Reduced Intensity Alternative

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The Reduced Intensity Alternative has been identified as the environmentally superior alternative. This alternative would lessen impacts associated with air quality, noise, police and fire, public services, recreation, and transportation/traffic by approximately 20%. The remaining impacts are generally the same as the proposed project. However, the benefits of providing additional housing in a job rich area would be less under this alternative than the proposed project. By comparison, the proposed project allows for the development of a wide-range of housing opportunities in close proximity to regional employment and activity centers in The Platinum Triangle and the Downtown Area. The Reduced Intensity Alternative may also impede the City's ability to achieve its housing goals contained in the adopted Housing Element. This alternative would meet most but not all of the project objectives as described in Section 4.2 although it would contribute less housing to a jobs rich region.

Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts." [Guidelines Sec. 15126.6(c)]



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