

# 7. Alternatives to the Proposed Project

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## 7.1 INTRODUCTION

### 7.1.1 Purpose and Scope

The California Environmental Quality Act (CEQA) requires that an Environmental Impact Report (EIR) include a discussion of reasonable project alternatives that would “feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any significant 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 (NOP) 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]).

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- “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 that would be avoided or lessened by the alternative,
- Assesses whether the alternative would meet most of the basic project objectives, and
- Evaluates the comparative merits of the alternative and the project.

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.

### 7.1.2 Project Objectives

As described in Section 3.2, 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:

1. Revitalize the Project Area as a safe, attractive, and economically thriving corridor in the heart of West Anaheim.
2. Remove significant barriers to infill development and promote the reuse and redevelopment of existing vacant and underutilized properties along the Beach Boulevard corridor.
3. Streamline the project approval process.
4. Improve the physical image and brand the corridor to help attract reinvestment; new investment; and quality retail, dining, and entertainment uses.
5. Incentivize development and relocation of high quality businesses to the corridor.
6. Create quality employment opportunities by strengthening the overall economic base of the area.
7. Encourage a balanced mix of uses including a variety of housing types consistent with the City’s adopted Housing Element.
8. Facilitate the Caltrans relinquishment process to assume control of the right-of-way along Beach Boulevard within the City limits to streamline the project approval process and implement landscaping, median, and driveway entrance improvements.

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9. Foster development that reduces vehicle miles traveled by promoting alternatives to driving, such as walking, biking, and use of mass transit.
10. Create additional gathering and recreation areas and opportunities.
11. Promote sustainable development and infrastructure design.
12. Meet state and regional sustainability mandates.

### 7.2 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 Draft EIR.

#### 7.2.1 Alternative Development Areas

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 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, greenhouse gas (GHG) emission, 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.

As the California Supreme Court indicated in its decisions in *Citizens of Goleta Valley v. Board of Supervisors*, 52 Cal. 3d 553 (1990):

The general plan has been aptly described as the “constitution for all future developments” within the city or county... “The propriety of virtually any local decision affecting land use and development depends upon consistency with the applicable general plan and its elements...”. To be sure, the general plan is not immutable, far from it. But it may not be trifled with lightly, as the limitation on the number of amendments to the general plan in any calendar year attests.” (Goleta, 52 cal.3d at 570-571)

[In] some circumstances, an EIR may consider alternatives requiring a site-specific amendment of the general plan. However, an EIR is not ordinarily an occasion for the reconsideration or overhaul of fundamental land use policy. (Goleta, at 573)

The adopted General Plan already allows a significant amount of residential and non-residential development within the Project Area. However, there have been several impediments to infill development and

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redevelopment of vacant and underutilized parcels in the West Anaheim area. The main objective of the project is to revitalize the Project Area as a safe, attractive, and economically thriving corridor in the heart of West Anaheim. This would not be achieved by adopting a specific plan in another area of the City. Consistent with the supreme court's interpretation of the role of the General Plan in framing CEQA alternatives analysis, and in consideration of the General Plan Update, no alternative sites within the jurisdiction of the City are considered to be feasible alternatives to the Proposed Project, since they would not achieve the main objective of the Project. Therefore, an alternative site could not feasibly accomplish most of the basic objectives of the Proposed Project, and thus there are no available alternative sites which could accommodate the Proposed Project.

### 7.3 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
- Increased Commercial Use Alternative
- Residential Development Cap Alternative

CEQA requires the alternatives analysis to include a No Project Alternative. The purpose of analyzing No Project Alternative is to allow decision makers to compare the impacts of approving the Proposed Project with the impacts of not approving the Proposed Project (CEQA Guidelines § 15126.6[e][1]). According to CEQA Guidelines § 15126.6[e][2], the No Project Alternative “shall discuss the existing conditions at the time the notice of preparation is published...as well as what would reasonably be expected to occur in the foreseeable future if the Proposed Project were not approved, based on current plans, and consistent with available infrastructure and community services.” This chapter analyzes in detail one No Project/Existing General Plan 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, GHG emissions, and traffic were found to be significant and unavoidable. Section 7.7 identifies the Environmentally Superior Alternative.

#### Alternatives Comparison

The Preferred Land Use Alternative (Proposed Project) is analyzed in detail in Chapter 5 of this DEIR. Table 7-1 provides a summary of each project alternative analyzed in this chapter.

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Table 7-2 provides a summary of maximum buildout projections and corresponding increases/changes for each of the three land use alternatives and the Proposed Project. It is important to note that the maximum buildout numbers shown are not growth projections. That is, they do not anticipate what is likely to occur by a certain time horizon, but provide a buildout scenario that would only occur if all the areas within the Project Area were to develop to the capacities yielded by the land use alternatives. The following statistics were developed as a tool to better understand the difference between the alternatives analyzed in the DEIR.

**Table 7-1 Summary of Development Alternatives**

Alternative	Description	Basis for Selection and Summary of Analysis
<b>Proposed Project</b>		
Beach Boulevard Specific Plan	<ul style="list-style-type: none"> <li>• Adopt a new specific plan for this area of West Anaheim.</li> <li>• 2,189,445 SF of maximum non-residential (additional 907,321 SF from existing)</li> <li>• 5,128 DU (3,651 additional DU)</li> <li>• 5,522 employees</li> <li>• 1.08 jobs/housing ratio</li> <li>• 77,256 ADT</li> </ul>	n/a
<b>Project Alternatives</b>		
1) No Project/ Existing General Plan Alternative	<ul style="list-style-type: none"> <li>• The BBSP would not be adopted and the existing General Plan and Zoning designations would remain.</li> <li>• 3,440,328 SF of maximum non-residential (additional 2,158,204 SF from existing)</li> <li>• 2,516 DU (1,039 additional DU)</li> <li>• 8,601 employees</li> <li>• 3.42 jobs/housing ratio</li> <li>• 86,941 ADT</li> </ul>	<ul style="list-style-type: none"> <li>• Required by CEQA</li> <li>• Avoids need for general plan and zone change</li> <li>• Increases significant impacts to air quality, GHG and transportation/traffic</li> <li>• Does not meet the project objectives</li> </ul>
2) Increased Commercial Use Alternative	<ul style="list-style-type: none"> <li>• Allows only commercial uses on the Westgate site.</li> <li>• 2,272,243 SF of maximum non-residential (additional 990,619 SF from existing)</li> <li>• 4,973 DU (3,496 additional DU)</li> <li>• 5,730 employees</li> <li>• 1.15 jobs/housing ratio</li> <li>• 77,256 ADT</li> </ul>	<ul style="list-style-type: none"> <li>• Would improve the City's jobs/housing ratio</li> <li>• Does not avoid significant environmental impacts</li> <li>• Meets all of the project objectives</li> </ul>
3) Residential Development Cap Alternative	<ul style="list-style-type: none"> <li>• Does not change the proposed Specific Plan designations.</li> <li>• Adds a residential development cap of 2,500 DUs to Table 4-1 in the Specific Plan</li> <li>• 3,440,328 SF of maximum non-residential (additional 2,158,204 SF from existing)</li> <li>• 2,500 DU (1,023 additional DU)</li> <li>• 5,730 employees</li> <li>• 2.29 jobs/housing ratio</li> <li>• 62,418 ADT</li> </ul>	<ul style="list-style-type: none"> <li>• Would reduce air quality, GHG, and traffic impacts.</li> <li>• Does not avoid significant environmental impacts.</li> <li>• Meets some of the project objectives but not to the degree of the Proposed Project.</li> </ul>

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### 7.4 NO PROJECT/EXISTING GENERAL PLAN ALTERNATIVE

This alternative, which is required by CEQA, assumes that the existing general plan and zoning designations would remain unchanged. The Project Area currently contains approximately 1.3 million square feet of non-residential land uses and 1,477 dwelling units. Under this alternative the Project Area would be developed to the maximum buildout potential under the current general plan and zoning designations. Under this alternative, an additional 2,158,204 square feet of non-residential land uses and 1,039 additional dwelling units would be developed within the Project Area.

#### 7.4.1 Aesthetics

Under this alternative, improvements to the existing visual character of the Project Area would not occur, and no visually beneficial impacts from implementation of the specific plan would occur. The Proposed Project includes new development standards, permitted and prohibited uses, design guidelines, and implementation programs to promote revitalization of the Project Area. No visually adverse impacts have been identified by the Proposed Project, and under the No Project/Existing General Plan Alternative, no significant visual impacts would be anticipated. However, since the visual improvements associated with the Proposed Project would not occur, this alternative is environmentally inferior to the Proposed Project. This is not a significant and unavoidable impact of the Proposed Project.

#### 7.4.2 Air Quality

Under this alternative, the increase in development intensity would increase construction-related emissions and result in approximately 9,685 additional trips (86,941 ADT versus 77,256 ADT). As a result, this alternative would increase the operational air quality impacts to VOC, NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub>. This alternative is environmentally inferior to the Proposed Project. Air quality impact is a significant and unavoidable impact of the Proposed Project. Significant short-term and long-term operational impacts would remain significant and unavoidable.

#### 7.4.3 Cultural Resources

Under this alternative, like the Proposed Project, some existing buildings would be removed and redeveloped over time. Therefore, the potential impacts to subsurface archaeological and paleontological resources would be similar under this alternative. Cultural resources impacts of this alternative are environmentally similar to the Proposed Project. Cultural resources are not a significant and unavoidable impact of the Proposed Project.

#### 7.4.4 Geology and Soils

The City of Anaheim, including the Project Area, is not underlain by a known Alquist-Priolo Earthquake Fault Zone; however, there are known active faults in the region that can cause ground shaking and other secondary hazardous seismic and geologic conditions that can adversely impact existing structures. No significant geologic and soils impacts have been identified provided that existing regulations and standard

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conditions are implemented prior to and during building construction. Therefore, this alternative is environmentally neutral to the Proposed Project. This is not a significant and unavoidable impact of the Proposed Project.

### 7.4.5 Greenhouse Gas Emissions

Under this alternative, the projected GHG emissions of 99,150 MTCO<sub>2</sub>e from project-related operational activities would be increased by 11 percent to 111,404 MTCO<sub>2</sub>e. This alternative would be environmentally inferior to the Proposed Project, and the significant and unavoidable GHG emissions impacts would be worsened. This is a significant and unavoidable impact of the Proposed Project.

### 7.4.6 Hazards and Hazardous Materials

The Project Area is currently developed with various commercial uses that handle, store, and dispose of various hazardous materials. Compliance with existing regulations and standards related to hazardous materials currently provide adequate environmental safety within the Project Area. The Proposed Project promotes redevelopment and revitalization of the Project Area, therefore promoting cleanup where necessary and phase-out hazardous materials use where appropriate. Existing land uses would continue to operate under this alternative and opportunities for redevelopment be reduced. This alternative is environmentally inferior to the Proposed Project. This is not a significant and unavoidable impact of the Proposed Project.

### 7.4.7 Hydrology and Water Quality

The Project Area is already developed with urban uses, and most runoff is conveyed by surface streets or local storm drains to regional storm drainage facilities. Under the No Project Alternative, no changes to the drainage pattern or system would occur. The Proposed Project would likely increase impervious surfaces in the Project Area due to increased development square footages. However, the BBSP would also implement site design measures, Low Impact Development, and best management practices—such as biofiltration treatment features, permeable paving materials, and porous asphalt infiltration features—that reduce runoff volumes that are conveyed to drainage system, as appropriate. The approach in dealing with water quality requirements would be similar under the Proposed Project and this alternative in that a project-specific water quality management plan would also be prepared and recommendations therein would be implemented so that no significant impacts on hydrology and water quality occur. No significant impact under the No Project/Existing General Plan Alternative would occur, and this alternative is environmentally neutral to the Proposed Project. This is not a significant and unavoidable impact of the Proposed Project.

### 7.4.8 Land Use and Planning

No changes to the current land uses would occur under this alternative. No general plan or zoning code amendments would be necessary. However, the existing uses would be allowed to operate even under the Proposed Project. Additionally, the Proposed Project provides long-term economic opportunities and new vision for the future in a more sustainable manner. This alternative is environmentally inferior to the Proposed Project. This is not a significant and unavoidable impact of the Proposed Project.

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### 7.4.9 Noise

Most of the Project Area is currently developed and several noise-sensitive receptors such as residences, hospitals, hotels, and schools are located within the Project Area. Under this alternative, the increase in development intensity would increase construction-related noise and result in approximately 9,685 additional trips (86,941 ADT versus 77,256 ADT). Therefore, potential noise impacts would be increased. This alternative is environmentally inferior to the Proposed Project. This is not a significant and unavoidable impact of the Proposed Project.

### 7.4.10 Population and Housing

Under this alternative, fewer residential units and more non-residential development would be constructed, as compared to the Proposed Project. The jobs/housing ratio for the Project Area would be 3.42, as compared to 1.08 for the Proposed Project. Although jobs-housing goals and ratios are advisory only, a range of 1.3 to 1.7 is recognized by the American Planning Association (APA) as being balanced and is used in this analysis as a guideline. As shown in previous Table 5.10-6, the overall job/housing ratio for the City is projected to be 1.92 in 2040. This alternative would worsen the City's projected jobs/housing ratio due to the increase in employment. Therefore, this alternative is environmentally inferior to the Proposed Project. This is not a significant and unavoidable impact of the Proposed Project.

### 7.4.11 Public Services

Under this alternative, approximately 3.4 million square feet of non-residential building space and 2,516 residential units would be provided within the Project Area; therefore, additional public services demands related to school, public library, and daycare would be reduced due to the reduction in residential units. Demands for these services are typically greater with residential uses compared to nonresidential uses. Impacts to fire and police would be similar. This alternative is environmentally superior to the Proposed Project. This is not a significant and unavoidable impact of the Proposed Project.

### 7.4.12 Recreation

Under the No Project/Existing General Plan Alternative, no additional demand for parks and recreational facilities would be reduced since no fewer residential units would be constructed. However, opportunities for additional recreational amenities for the existing Anaheim residents would also be lost. This alternative is environmentally neutral to the Proposed Project. This is not a significant and unavoidable impact of the Proposed Project.

### 7.4.13 Transportation and Traffic

Under this alternative, the increase in development intensity would result in approximately 9,685 additional trips (86,941 ADT versus 77,256 ADT). This would result greater impacts to intersections and arterial segments, as compared to the Proposed Project. This alternative is environmentally inferior to the Proposed Project. This is a significant and unavoidable impact of the Proposed Project.

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### 7.4.14 Tribal Cultural Resources

Under this alternative, like the Proposed Project, some existing buildings would be removed and redeveloped over time. Therefore, the potential impacts to subsurface tribal cultural resources would be similar under this alternative. Tribal cultural resources impacts of this alternative are environmentally similar to the Proposed Project. Tribal cultural resources are not a significant and unavoidable impact of the Proposed Project.

### 7.4.15 Utilities and Service Systems

Under this alternative, approximately 3.4 million square feet of non-residential building space and 2,516 residential units would be provided within the Project Area. The increase in non-residential square footage is offset by the reduction in residential units. Therefore, impacts to utilities and service systems would be similar. However, Project impacts to utilities and service systems would be less than significant with mitigation and no significant impacts have been identified. This alternative is environmentally neutral to the Proposed Project. This is not a significant and unavoidable impact of the Proposed Project.

### 7.4.16 Conclusion

#### Avoid or Substantially Lessen Project Impacts

As summarized in Table 7-2, this alternative would lessen impacts to public services. Impacts related to cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, tribal cultural resources, and utilities and service systems would be similar to the Proposed Project. Greater impacts are anticipated for aesthetics, land use and planning, and population and housing. Significant and unavoidable impacts related to air quality, GHG emissions, and transportation and traffic would be increased.

**Table 7-2 Summary of No Project/Existing General Plan Alternative Impacts**

Environmental Issue	Potential Significance of Alternative's Impact	Summary of Proposed Project Impacts	Comparison
Aesthetics	Less than Significant	Less Than Significant	Greater Than Project
Air Quality	Significant and Unavoidable After Mitigation	Significant and Unavoidable After Mitigation	Greater Than Project
Cultural Resources	Less Than Significant After Mitigation	Less Than Significant After Mitigation	Similar to the Project
Geology and Soils	Less Than Significant	Less Than Significant	Similar to the Project
Greenhouse Gas Emissions	Significant and Unavoidable After Mitigation	Significant and Unavoidable After Mitigation	Greater Than Project
Hazards and Hazardous Materials	Less Than Significant After Mitigation	Less Than Significant After Mitigation	Similar to the Project
Hydrology and Water Quality	Less Than Significant	Less Than Significant	Similar to the Project
Land Use and Planning	Less Than Significant	Less Than Significant	Greater Than Project
Noise	Less than Significant After Mitigation	Less Than Significant After Mitigation	Greater Than Project
Population and Housing	Less Than Significant	Less Than Significant	Greater Than Project

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**Table 7-2 Summary of No Project/Existing General Plan Alternative Impacts**

Environmental Issue	Potential Significance of Alternative's Impact	Summary of Proposed Project Impacts	Comparison
Public Services	Less Than Significant	Less Than Significant	Less Than Project
Transportation and Traffic	Significant and Unavoidable After Mitigation	Significant and Unavoidable After Mitigation	Greater Than Project
Tribal Cultural Resources	Less Than Significant After Mitigation	Less Than Significant After Mitigation	Similar to the Project
Utilities and Service Systems	Less Than Significant	Less Than Significant	Similar to the Project

### Attainment of Project Objectives

This alternative would not meet any of the project objectives identified in Section 7.2.1.

## 7.5 INCREASED COMMERCIAL USE ALTERNATIVE

Under the Increased Commercial Use Alternative, 4.3 acres from the mixed-use medium uses allowed on the Westgate site (located on the northeast corner of Beach Boulevard and Lincoln Avenue) would be converted to regional commercial uses, allowing only commercial uses. Under this alternative, the total regional commercial uses would increase from 380,000 square feet to 483,298 square feet, whereas the non-residential uses and the number of residential units from the mixed use medium uses would decrease from 210,575 square feet to 190,575 square feet, and 605 unit to 450 units, respectively. This conversion would keep the total number of ADT the same as under the Proposed Project (77,256 ADT for both the Proposed Project and the Increased Commercial Use Alternative). The jobs housing ratio under this alternative would improve from 1.08 (Proposed Project) to 1.15 (Increased Commercial Use Alternative) within the Specific Plan area.

### 7.5.1 Aesthetics

Implementation of this alternative would eliminate 155 residential units and increase the amount of commercial space on the Westgate site. Under this alternative, the Specific Plan would continue to provide new development standards, permitted and prohibited uses, design guidelines, and implementation programs to promote revitalization of the Project Area. Therefore, enhancements to the aesthetic character of the project area would be similar to the Proposed Project. This alternative is environmentally neutral to the Proposed Project. This is not a significant and unavoidable impact of the Proposed Project.

### 7.5.2 Air Quality

Under this alternative, the Westgate site, comprising of approximately 4.3 acres would be converted from mixed uses to commercial uses, while keeping the total number of ADT as the Proposed Project, which is 77,256 ADT. Under this alternative, the jobs-housing ratio would increase from 1.08 for the Proposed Project to 1.15 for this alternative, slightly improving the ratio within the BBSP area when compared to APA's jobs-housing goal of 1.5. However, the City of Anaheim is projected to be jobs-rich city with 1.87 ratio in 2020 and 1.92 by 2040, and more jobs than housing within BBSP under this alternative, therefore, is less likely to

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capture trips within the City and more likely to result in greater VMT. Air quality impacts cannot be contained within BBSP boundaries and the slight change jobs-housing balance within the BBSP would not generally affect the overall City's jobs-housing balance and trip capture ability. Similar to the Proposed Project, significant and unavoidable air quality impacts would occur. This alternative is environmentally neutral to the Proposed Project since air quality impacts would be similar.

### 7.5.3 Cultural Resources

Under this alternative, like the Proposed Project, existing buildings would be removed and redeveloped over time. Therefore, the potential impacts to subsurface archaeological and paleontological resources would be similar under this alternative. Cultural resources impacts of this alternative are environmentally similar to the Proposed Project. Cultural resources are not a significant and unavoidable impact of the Proposed Project.

### 7.5.4 Geology and Soils

No changes to the project boundaries would occur under this alternative, and all development projects under this alternative would be required to comply with the most recently updated building and seismic codes and regulations. No significant geologic and soils impacts have been identified, and this alternative is environmentally neutral to the Proposed Project. This is not a significant and unavoidable impact of the Proposed Project.

### 7.5.5 Greenhouse Gas Emissions

Under this alternative, the projected GHG emissions of 99,150 MTCO<sub>2e</sub> from project-related operational activities would remain the same. This alternative would be environmentally neutral to the Proposed Project, and the significant and unavoidable GHG emissions impacts would be similar. This is a significant and unavoidable impact of the Proposed Project.

### 7.5.6 Hazards and Hazardous Materials

The Project Area is currently developed with various commercial uses that handle, store, and dispose of various hazardous materials. Compliance with existing regulations and standards related to hazardous materials currently provide adequate environmental safety within the BBSP area. Under this alternative, BBSP would continue to emphasize sustainable development, which would encourage cleanup and phasing out of hazardous materials use where necessary. Under this alternative, residential uses would be allowed on the Westgate site, which is a former landfill containing hazardous materials. However, no residential uses would be allowed on the former landfill portion of the site, and required site cleanup would occur before development. Therefore, no new significant impacts related to hazards and hazardous materials would occur. No significant impacts related to hazardous materials were identified under the Proposed Project, and no significant impacts are anticipated under this alternative. This alternative is environmentally neutral to the Proposed Project. This is not a significant and unavoidable impact of the Proposed Project.

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### 7.5.7 Hydrology and Water Quality

The Project Area is already developed with urban uses and most runoff is conveyed by surface streets or local storm drains to regional storm drainage facilities. Like the Proposed Project, this alternative would increase impervious surfaces in the Project Area due to increased development square footages. However, this alternative would also implement site design measures, Low Impact Development, and best management practices—such as biofiltration treatment features, permeable paving materials, and porous asphalt infiltration features—that reduce runoff volumes that are conveyed to drainage system, as appropriate. The approach in dealing with water quality requirements would be similar under the Proposed Project and this alternative—that is, a project-specific water quality management plan would also be prepared and recommendations therein would be implemented so that no significant impacts on hydrology and water quality occur. No significant impact under the Increased Residential Use Alternative would occur, and this alternative is environmentally neutral to the Proposed Project. This is not a significant and unavoidable impact of the Proposed Project.

### 7.5.8 Land Use and Planning

This alternative would require all of the amendments proposed under the Proposed Project. Therefore, the potential land use impacts would be similar to those of the Proposed Project. This alternative is environmentally neutral to the Proposed Project. Land Use and Planning is not a significant and avoidable impact of the Proposed Project.

### 7.5.9 Noise

Most of the Project Area is currently developed, and several noise-sensitive receptors such as residences, hospitals, hotels, and schools are within the Project Area. Under this alternative, the increase in residential uses is offset by a corresponding decrease in commercial square footage. As a result, total traffic volumes would be the same as the Proposed Project (77,256 ADT). Therefore, potential noise impacts would be similar. This alternative is environmentally neutral to the Proposed Project. This is not a significant and unavoidable impact of the Proposed Project.

### 7.5.10 Population and Housing

Under this alternative, more non-residential development would be constructed compared to the Proposed Project. The jobs/housing ratio for the Project Area would be 1.15 under this alternative, compared to 1.08 for the Proposed Project. Although jobs-housing goals and ratios are advisory only, a ratio of 1.5 and/or a range of 1.3 to 1.7 is recognized by the APA as being balanced and is used in this analysis as a guideline. Therefore, this alternative would allow more balanced jobs/housing ratio within the BBSP Area. However, as shown in previous Table 5.10-6, the overall job/housing ratio for the City is projected to be 1.92 in 2040. This indicates that the City is projected to be a jobs-rich city and more housing units are necessary to meet the APA's advisory goal. Because this alternative reduce 155 residential units from the Proposed Project and convert to commercial uses, this alternative would worsen the City's overall jobs/housing ratio by adding

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more jobs than housing. Therefore, this alternative is environmentally inferior to the Proposed Project. This is not a significant and unavoidable impact of the Proposed Project.

### 7.5.11 Public Services

The demand for public services would be slightly increased because the number of residential units would be slightly increased compared to the Proposed Project. Typically, greater public services demands are associated with residential uses compared to nonresidential uses. Therefore, demands for fire, police, school, public library, and daycare would likely increase under this alternative. When compared in general, public service impacts would be environmentally inferior to the Proposed Project. This is not a significant and unavoidable impact of the Proposed Project.

### 7.5.12 Recreation

Under this alternative, demands for parks, open space, and recreation facilities within BBSP would be reduced as these recreational opportunities are generally generated by residents rather than employees. Public and private open space requirements identified as part of the BBSP would be applicable, where minimum open space areas are identified per residential unit and for non-residential uses. Adequate recreational services would be provided for the proposed uses under this alternative and for the Proposed Project. This alternative is environmentally similar to the Proposed Project. This is not a significant and unavoidable impact of the Proposed Project.

### 7.5.13 Transportation and Traffic

Under this alternative, more commercial uses would be provided compared to the Proposed Project, but the total number of ADT would be the same as under the Proposed Project (i.e., 77,256 ADT). However, there would be less opportunities for trip capture and reductions in VMT under this alternative compared to the Proposed Project, because residential units would be eliminated on the Westgate site. Considering the same number of ADT as the Proposed Project, significant and unavoidable transportation and traffic impacts would still occur under this alternative. This alternative is environmentally neutral to the Proposed Project since traffic impacts would be similar.

### 7.5.14 Tribal Cultural Resources

Under this alternative, like the Proposed Project, some existing buildings would be removed and redeveloped over time. Therefore, the potential impacts to subsurface tribal cultural resources would be similar under this alternative. Tribal cultural resources impacts of this alternative are environmentally similar to the Proposed Project. Tribal cultural resources are not a significant and unavoidable impact of the Proposed Project.

### 7.5.15 Utilities and Service Systems

Under this alternative, 155 residential units would be eliminated from the Westgate site and the total non-residential uses would increase from 2,189,445 square feet under the Proposed Project to 2,272,743 square feet. Considering that residential uses make up less than 10 percent of the overall utilities demands, additional

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83,298 square feet of non-residential uses would result in greater utilities and service systems impacts. Therefore, utilities and service systems impacts would likely be inferior to the Proposed Project. This is not a significant, unavoidable impact of the Proposed Project.

### 7.5.16 Conclusion

#### Avoid or Substantially Lessen Project Impacts

As summarized in Table 7-3, this alternative would slightly increase impacts to population and housing, public services. Population and housing impacts would be reduced slightly. Impacts to all other issue areas would be similar to the Proposed Project. Significant and unavoidable impacts related to air quality, GHG emissions, and transportation and traffic would still occur.

**Table 7-3 Summary of Increased Residential Use Alternative Impacts**

Environmental Issue	Potential Significance of Alternative's Impact	Summary of Proposed Project Impacts	Comparison
Aesthetics	Less Than Significant	Less Than Significant	Similar to the Project
Air Quality	Significant and Unavoidable After Mitigation	Significant and Unavoidable After Mitigation	Similar to the Project
Cultural Resources	Less Than Significant After Mitigation	Less Than Significant After Mitigation	Similar to the Project
Geology and Soils	Less Than Significant	Less Than Significant	Similar to the Project
Greenhouse Gas Emissions	Significant and Unavoidable After Mitigation	Significant and Unavoidable After Mitigation	Similar to the Project
Hazards and Hazardous Materials	Less Than Significant After Mitigation	Less Than Significant After Mitigation	Similar to the Project
Hydrology and Water Quality	Less Than Significant	Less Than Significant	Similar to the Project
Land Use and Planning	Less Than Significant	Less Than Significant	Similar to the Project
Noise	Less than Significant After Mitigation	Less Than Significant After Mitigation	Similar to the Project
Population and Housing	Less Than Significant	Less Than Significant	Greater Than Project
Public Services	Less Than Significant	Less Than Significant	Greater Than Project
Transportation and Traffic	Significant and Unavoidable After Mitigation	Significant and Unavoidable After Mitigation	Similar to the Project
Tribal Cultural Resources	Less Than Significant After Mitigation	Less Than Significant After Mitigation	Similar to the Project
Utilities and Service Systems	Less Than Significant	Less Than Significant	Greater Than Project

#### Attainment of Project Objectives

This alternative would meet all of the objectives of the Proposed Project identified in Section 7.1.2.

## 7. Alternatives to the Proposed Project

### 7.6 RESIDENTIAL DEVELOPMENT CAP ALTERNATIVE

The Residential Development Cap Alternative would not change the proposed specific plan designations. However, a residential development cap would be added to Table 4-1 in the specific plan to limit the number of residential units within the specific plan area to 2,500 dwelling units. Non-residential square footage would remain the same as under the Proposed Project. This alternative would reduce overall ADT from 77,256 to 62,418, a 20 percent decrease in total trips generated within the specific plan area compared to the Proposed Project. The intent of this alternative is to reduce the air quality, GHG emissions, and traffic impacts associated with implementation of the Proposed Project while achieving the basic objectives of the Proposed Project.

#### 7.6.1 Aesthetics

Under this alternative, the overall decrease in development density would potentially result in slightly reduced visual impacts during construction, as the duration and intensity would be less than the Proposed Project. The anticipated visual enhancement from various public realm improvements and consistent design schemes would be similar to the Proposed Project. However, there would be fewer opportunities for redevelopment of blighted and underutilized sites within the Project Area. Therefore, this alternative is environmentally inferior to the Proposed Project. This is not a significant and unavoidable impact of the Proposed Project.

#### 7.6.2 Air Quality

This alternative would reduce overall ADT from 77,256 to 62,418, a 20 percent decrease from the Proposed Project in total trips generated within the specific plan area. Therefore, the Residential Development Cap Alternative would reduce regional air quality impacts by approximately 20 percent. With residential units capped at 2,500 dwelling units, there would be less development potential within the Project Area, and daily emissions associated with construction would likely be less, but would still exceed the SCAQMD's threshold levels for VOC, NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub>. The maximum daily operational phase regional emissions would be reduced by 20 percent. However, even with that reduction, the net increase would continue to exceed SCAQMD's threshold levels for VOC, NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub>. As with the Proposed Project, the Residential Development Cap Alternative could potentially exceed the assumptions in the AQMP and considered inconsistent with the AQMP. This alternative would slightly reduce the air quality impacts, and it would be environmentally superior to the Proposed Project. However, significant and unavoidable construction and operational phase air quality impacts would not be eliminated.

#### 7.6.3 Cultural Resources

Under this alternative, like the Proposed Project, existing buildings would be removed and redeveloped over time. Therefore, the potential impacts to subsurface archaeological and paleontological resources would be similar under this alternative. Cultural resources impacts of this alternative are environmentally similar to the Proposed Project. Cultural resources are not a significant and unavoidable impact of the Proposed Project.

## 7. Alternatives to the Proposed Project

### 7.6.4 Geology and Soils

No changes to the project boundaries would occur under this alternative, and all development projects under this alternative would be required to comply with the most recently updated building and seismic codes and regulations. No significant geologic and soils impacts have been identified, and this alternative is environmentally neutral to the Proposed Project. Geology and soils is not a significant and unavoidable impact of the Proposed Project.

### 7.6.5 Greenhouse Gas Emissions

This alternative would reduce overall ADT from 77,256 to 62,418, a 20 percent decrease from the Proposed Project in total trips generated within the Project Area. Indirect emissions from offsite energy production required for onsite activities, water use, and waste disposal would also be reduced due to the reduction in units. Under this alternative, the projected GHG emissions of 99,150 MTCO<sub>2e</sub> from project-related operational activities would be decreased by approximately 20 percent to 79,320 MTCO<sub>2e</sub>. However, even with the reduced ADT anticipated from the reduction in housing units, the total GHG emissions would exceed the screening threshold of 3,000 MTCO<sub>2e</sub>. As with the Proposed Project, this alternative would continue to promote the increase utilization of alternative forms of transportation and reduction in VMTs, and the BBSP includes policies and actions to increase bike and pedestrians pathways and to create a better-connected alternative transportation and active transit system. This alternative is environmentally superior to the Proposed Project. However, because this alternative would also exceed the screening threshold of 3,000 MTCO<sub>2e</sub>, impacts related to GHG emissions would be significant and unavoidable. GHG emissions impact was identified as significant and unavoidable under the Proposed Project and would remain significant and unavoidable.

### 7.6.6 Hazards and Hazardous Materials

The Project Area is currently developed with various industrial operations that handle, store, and dispose of various hazardous materials. Compliance with existing regulations and standards related to hazardous materials currently provide adequate environmental safety within the BBSP area. Under this alternative, BBSP would continue to emphasize green technologies and sustainable developments, and therefore would encourage cleanup and phasing out of hazardous materials use where necessary. No significant impacts related to hazardous materials were identified under the Proposed Project, and no significant impacts are anticipated under this alternative. This alternative is environmentally neutral to the Proposed Project. This is not a significant and unavoidable impact of the Proposed Project.

### 7.6.7 Hydrology and Water Quality

The Project Area is already developed with urban uses and most runoff is conveyed by surface streets or local storm drains to regional storm drainage facilities. Like the Proposed Project, this alternative would increase impervious surfaces in the Project Area due to increased development square footages. However, this alternative would also implement site design measures, Low Impact Development, and best management practices—such as biofiltration treatment features, permeable paving materials, and porous asphalt infiltration

## 7. Alternatives to the Proposed Project

features—that reduce runoff volumes that are conveyed to drainage system, as appropriate. The approach in dealing with water quality requirements would be similar under the Proposed Project and this alternative in that a project-specific water quality management plan would also be prepared, and recommendations therein would be implemented so that no significant impacts on hydrology and water quality occur. No significant impact under the Residential Development Cap Alternative would occur, and this alternative is environmentally neutral to the Proposed Project. This is not a significant and unavoidable impact of the Proposed Project.

### 7.6.8 Land Use and Planning

This alternative would require all of the amendments proposed under the Proposed Project. Therefore, even with the change in the jobs/housing ratio, the potential land use impacts would be similar to those of the Proposed Project. This alternative is environmentally neutral to the Proposed Project. This is not a significant and unavoidable impact of the Proposed Project.

### 7.6.9 Noise

This alternative would reduce total ADT by approximately 20 percent, thereby decreasing project-related noise impacts. Reductions in residential units would reduce the amount and duration of construction, reducing construction trips compared to the Proposed Project. Under this alternative, the number of sensitive receptors that could be impacted by the development would also be less than the Proposed Project. This alternative is environmentally superior to the Proposed Project. The Proposed Project would result in significant short-term construction impacts, less than significant traffic roadway and vibration impacts.

### 7.6.10 Population and Housing

Under this alternative, fewer residential units would be constructed compared to the Proposed Project. The jobs/housing ratio for the Project Area would be 2.29, compared to 1.08 for the Proposed Project. Although jobs-housing goals and ratios are advisory only, a range of 1.3 to 1.7 is recognized by the APA as being balanced and is used in this analysis as a guideline. As shown in previous Table 5.10-6, the overall job/housing ratio for the City is projected to be 1.92 in 2040. This alternative would slightly worsen the City's projected jobs/housing ratio due to the decrease in residential units. Therefore, this alternative is environmentally inferior to the Proposed Project. This is not a significant and unavoidable impact of the Proposed Project.

### 7.6.11 Public Services

The demand for public services generated at the Project Area would be reduced by eliminating 2,473 dwelling units, including the project's impact on police, fire, schools, and libraries. However, with the reduction in development intensity, the anticipated tax revenues would also decrease, which may impact the fire, police, and public library service providers' ability to provide necessary facilities, equipment, and personnel. Therefore, with implementation of existing regulations and standard conditions, impacts related to public

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services would be similar to those of the Proposed Project. Public service impacts would be environmentally neutral to the Proposed Project. This is not a significant and unavoidable impact of the Proposed Project.

### 7.6.12 Recreation

Under the Residential Development Cap Alternative, the demand for parks and recreational facilities would be less than the Proposed Project. However, dedication standards and conditions identified for the Proposed Project would still be applicable under this alternative. Therefore, as with the Proposed Project, this alternative would also create development opportunities in an underutilized area, thereby alleviating development pressures in other open space areas that could be developed for parks or other recreational purposes. Recreation impacts would be environmentally neutral to the Proposed Project. This is not a significant and unavoidable impact of the Proposed Project.

### 7.6.13 Transportation and Traffic

This alternative would have fewer traffic-related impacts than the Proposed Project. Total ADT generated by the Proposed Project would be reduced by approximately 20 percent. Therefore, this alternative is environmentally superior to the Proposed Project. Impacted intersections, segments, and freeway facilities under the Proposed Project are within the jurisdiction of the cities of Anaheim, Buena Park, and Stanton, and Caltrans. Therefore, although reduced, it is reasonable to anticipate that impacted facilities under this alternative cannot be guaranteed to be improved to operate at acceptable LOS. Therefore, as with the Proposed Project, impacts to the cities of Buena Park and Stanton and Caltrans facilities would remain a significant and unavoidable impact under this alternative. This is a significant and unavoidable impact of the Proposed Project.

### 7.6.14 Tribal Cultural Resources

Under this alternative, like the Proposed Project, some existing buildings would be removed and redeveloped over time. Therefore, the potential impacts to subsurface tribal cultural resources would be similar under this alternative. Tribal cultural resources impacts of this alternative are environmentally similar to the Proposed Project. Tribal cultural resources are not a significant and unavoidable impact of the Proposed Project.

### 7.6.15 Utilities and Service Systems

This alternative would reduce the project's impact on sewer, water, electricity, natural gas, and solid waste by eliminating 2,473 dwelling units. It is anticipated that the majority of planned improvement and mitigation measures identified under the Proposed Project would still be required to reduce impacts to a less than significant level. This alternative is environmentally superior to the Proposed Project. This is not a significant and unavoidable impact of the Proposed Project.

## 7. Alternatives to the Proposed Project

### 7.6.16 Conclusion

#### Avoid or Substantially Lessen Project Impacts

As summarized in Table 7-4, this alternative would decrease impacts to air quality, GHG, noise, public services, transportation and traffic, and utilities and service systems. Impacts to aesthetics and population and housing would be increased. Impacts to all other issue areas would be similar to the Proposed Project. However, significant and unavoidable impacts related to air quality, GHG emissions, and transportation and traffic would still occur.

**Table 7-4 Summary of Residential Development Cap Alternative Impacts**

Environmental Issue	Potential Significance of Alternative's Impact	Summary of Proposed Project Impacts	Comparison
Aesthetics	Less than Significant	Less Than Significant	Greater than Project
Air Quality	Significant and Unavoidable After Mitigation	Significant and Unavoidable After Mitigation	Less Than Project
Cultural Resources	Less Than Significant After Mitigation	Less Than Significant After Mitigation	Similar to the Project
Geology and Soils	Less Than Significant	Less Than Significant	Similar to the Project
Greenhouse Gas Emissions	Significant and Unavoidable After Mitigation	Significant and Unavoidable After Mitigation	Less Than Project
Hazards and Hazardous Materials	Less Than Significant After Mitigation	Less Than Significant After Mitigation	Similar to the Project
Hydrology and Water Quality	Less Than Significant	Less Than Significant	Similar to the Project
Land Use and Planning	Less Than Significant	Less Than Significant	Similar to the Project
Noise	Less than Significant After Mitigation	Less Than Significant After Mitigation	Less Than Project
Population and Housing	Less Than Significant	Less Than Significant	Greater Than Project
Public Services	Less Than Significant	Less Than Significant	Less Than Project
Transportation and Traffic	Significant and Unavoidable After Mitigation	Significant and Unavoidable After Mitigation	Less Than Project
Tribal Cultural Resources	Less Than Significant After Mitigation	Less Than Significant After Mitigation	Similar to the Project
Utilities and Service Systems	Less Than Significant	Less Than Significant	Less Than Project

#### Attainment of Project Objectives

This alternative would meet some of the project objectives identified in Section 7.2.1, but not to the same extent as the Proposed Project.

## 7. Alternatives to the Proposed Project

### 7.7 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. The No Project/Existing General Plan Alternative is not environmentally superior to the Proposed Project.

The CEQA Guidelines (Section 15126[a]) state that an EIR must address “a range of reasonable alternatives to the project, or to the location of the project, which could feasibly attain the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives.

The DEIR identified significant and unavoidable impacts related to Air Quality, GHG emissions, and Traffic and Transportation.

The Residential Development Cap Alternative has been identified as “environmentally superior” to the Proposed Project. This alternative has been identified as having the least environmental impact and as being the superior of the three alternatives. The Residential Development Cap Alternative would lessen significant air quality, GHG, and traffic impacts associated with the Proposed Project by approximately 20 percent. However, although this alternative has the least environmental impact, it is not capable of eliminating any significant unavoidable adverse effects associated with the development. Additionally, it is anticipated that all mitigation measures identified under the Proposed Project would also need to be incorporated. 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]).

Moreover, while meeting all of the project objectives to a certain degree, it would not do so to the extent that can be achieved by the Proposed Project. For example, the Residential Development Cap Alternative would allow for some redevelopment and revitalization of the Project Area but not to the degree under the Proposed Project. Decreasing the residential development where additional density could be supported would result in greater development pressure elsewhere in the City.