

SECTION 6.0 ALTERNATIVES TO THE PROPOSED PROJECT

6.1 INTRODUCTION

Section 15126.6 of the California Environmental Quality Act (CEQA) Guidelines addresses the discussion of alternatives in an Environmental Impact Report (EIR). Key provisions of the CEQA Guidelines are identified throughout this section to explain the basis for the alternatives evaluation in this EIR. Section 15126.6(a) states:

“An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of 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. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason”.

6.1.1 PROJECT SUMMARY

The Master Development Plan Input (MDPI) identifies conceptual proposals for possible improvements within the Whittier Narrows Dam Basin Recreation Area (WNCBRA) and presents a long-term vision for the WNCBRA, including how and where new uses and activities might be accommodated. The MDPI proposes programs, facilities, and improvements to enhance natural ecosystems and habitats and to increase recreational opportunities at the WNCBRA, while ensuring that its flood risk management and water conservation functions are maintained. The MDPI does not serve as a formal update to the 1996 *Whittier Narrows Dam Master Plan*. Only the USACE has the authority to alter or update the 1996 Master Plan. The ultimate goal of the MDPI is to provide a guidance document with recommendations that have been vetted through a robust community input process that may be useful and help to inform a future USACE Master Plan update process.

The MDPI identifies potential facilities and uses that could be developed in the future, as well as projects or programs that could be implemented in the WNCBRA by the Water Conservation Authority (WCA) or its partner agencies in the short-term. Proposed projects can be categorized as one of the following: (1) administrative actions; (2) operational activities and programs by the WCA; and (3) proposed facilities and improvements that would result in physical changes at the WNCBRA.

6.1.2 PROJECT OBJECTIVES

CEQA Guidelines Section 15124(b) indicates that an EIR should include “a statement of objectives sought by the proposed project”.

Vision

An overarching vision was crafted to help guide the development of the MDPI. This overarching vision was translated into four major themes that guided and helped to shape concept proposals.

- **Restoration.** Addresses enhancement of the native landscape through removal of invasive vegetation and follow up management actions; enhancement of water conservation and recharge opportunities; improvement of water quality in the Rio Hondo and the San Gabriel River through more effective treatment of storm runoff; and improvement of water quality within the conservation pool through the implementation of area-specific Best Management Practices.
- **Reconnection.** Addresses improved community connections to the WND BRA so that residents may walk or bike safely to the area; signage and way-finding that can strengthen identity; safe road crossings; and opportunities for stewardship.
- **River Enhancement.** Enables visitors to experience a natural Southern California riparian environment in a safe and secure manner.
- **Recreation.** Seeks to define a flexible program for public use that anticipates needs over a 15- to 20-year planning horizon. Concept proposals are not intended to be prescriptive, but rather provide guidance based on underlying resource values and use compatibility that can inform future land use decision-making.

Resource Objectives

The Resource Objectives that have been developed for the WND BRA are listed in Table 4-1 in Section 4.0, Project Description, and include objectives for:

- Flood Protection;
- Water Conservation;
- Water Quality;
- Habitat Connectivity;
- Ecosystem Functions;
- Biodiversity;
- Education and Interpretation;
- Buffers;
- Recreation; and
- Low Density Recreation.

6.1.3 ALTERNATIVES TO THE PROPOSED PROJECT

In accordance with the CEQA Guidelines Section 15126.6(a), the discussion in this section focuses on a reasonable range of alternatives. This EIR includes an evaluation of the following alternatives to the proposed project:

- **No Project/No Action Alternative.** This alternative assumes that no changes to the existing facilities and improvements at the WNCBRA would occur and current environmental conditions would remain as is.
- **Current Master Plan Alternative.** This alternative assumes that future facilities and improvements at the WNCBRA would be developed as allowed under the 1996 *Whittier Narrows Dam Master Plan*.
- **Reduced Facilities Alternative.** This alternative assumes that a different set of facilities and improvements would be implemented at the WNCBRA. Specifically, a number of recreational facilities that are proposed in the MDPI would not be developed in the WNCBRA.
- **Conservation Only Alternative.** This alternative assumes that existing facilities at the WNCBRA would be retained but conservation programs would be implemented to preserve and/or restore natural areas and biological habitats. No new recreational facilities would be developed under this alternative.

6.2 ALTERNATIVES ELIMINATED FROM DETAILED CONSIDERATION

Section 15126.6(c) of the CEQA Guidelines specifies that an EIR should (1) identify any alternatives that were considered by the lead agency but were eliminated from detailed consideration because they were determined to be infeasible during the scoping process and (2) briefly explain the reasons underlying the lead agency's determination. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are (1) failure to meet most of the basic project objectives; (2) infeasibility; or (3) inability to avoid significant environmental impacts. Below are alternatives that have been eliminated from consideration.

6.2.1 OFF-SITE ALTERNATIVE SITES

Section 15126.6(f)(2)(A) of the CEQA Guidelines indicates that, in determining the consideration of an alternative location, "The key question and first step in 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". Section 15126.6(f)(3) of the CEQA Guidelines further states "an EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative".

The site for the proposed MDPI (the WNCBRA) consists of approximately 1,500 acres of recreational areas and riverine/natural environments. There is no site in the County that is of the same size and contains the same uses and conditions as the WNCBRA or that could benefit in the same way as the WNCBRA from the proposed recreational facilities and site improvements. Thus, an alternative site along another river segment or dam basin is not considered a feasible alternative to the proposal.

Alternatively, individual sites throughout the County may be developed with individual recreational facilities; habitat areas along rivers that may be subject to conservation and restoration efforts and locations for the proposed Green Streets and traffic calming measures. Selected park sites and trails along the Rio Hondo and San Gabriel River are subject to improvements under the Emerald Necklace project. If the MDPI projects are implemented

at other sites outside the WNCBRA, the WNCBRA would remain in its existing condition and would not complement the Emerald Necklace project, which includes the WNCBRA. Also, the benefits to smaller parks and river trails would replace project benefits to a larger recreational area such as the WNCBRA. Since these dispersed sites would not meet project objectives, this has also been rejected from further consideration. However, this does not mean that the WCA or its partner agencies would not pursue projects at smaller park sites and river trails along the Rio Hondo and San Gabriel River under separate undertakings.

6.2.2 INITIAL MDPI PROPOSAL

The initial proposal for the MDPI included a slightly different set of facilities and improvements. This alternative organizes the WNCBRA into six Planning Zones and one Conservation/Restoration Zone. The Planning Zones group the types and intensity of recreational activities that are compatible with each other and with the underlying natural resource values of the site. They include:

1. **Area A: Organized Athletics.** Located north of SR-60 and west of Rosemead Boulevard, this area would include opportunities for active organized sports, such as soccer, baseball, a skate park, BMX bicycle tracks, and court sports (e.g. tennis and basketball). This area would be bound on the west by the Rio Hondo Conservation/Restoration Zone.
2. **Area B: Family Activities.** Located north of SR-60 and east of Rosemead Boulevard, this area would include opportunities for family-related activities, such as group picnics, camping, outdoor amphitheater, movie nights, regional playground, splash park (water feature), and a welcome center.
3. **Area C: Range and Course Sports.** Located south of SR-60 and west of Rosemead Boulevard, this area would provide opportunities for active sports, such as rifle/revolver/clay shooting range, archery, disc golf, BMX bicycle tracks, and technical mountain bicycle trails. This area would be bound on the west by the Rio Hondo Conservation/Restoration Zone.
4. **Areas D, E: Lake Zone.** Located south of SR-60 and east of Rosemead Boulevard, this area would provide opportunities for lake and botanical-related activities, such as fishing, non-motorized boating, fitness routes, camping, group picnics, community gardens, and arboretums. This area would be bound on the south by the San Gabriel River/Lario Creek Conservation/Restoration Zone.
5. **Area F: Fairgrounds.** Located south of the San Gabriel River and north of I-605, this area would provide opportunities for active recreation activities, such as the equestrian center, sports arena, group picnic areas, athletic fields, and a performance pavilion. This area would be bound on the north and west by the San Gabriel River/Lario Creek Conservation/Restoration Zone.
6. **Area G: Golf Course.** Located west of the Rio Hondo, this planning area would provide for the continued operation of the existing Whittier Narrows Golf Course.

The Conservation/Restoration Zone includes areas adjacent to the San Gabriel River, the Rio Hondo, Zone 1 Ditch, and the spreading grounds. These areas would provide increased opportunities for habitat restoration and invasive plant removal, where appropriate, maintain existing recreational trails, and provide small “natural area” parks along the waterways in locations where they are compatible with existing trail infrastructure and biological resources.

While the majority of the proposed facilities and improvements under this initial alternative are similar to those in the proposed MDPI, this alternative had proposed the following:

- relocation of the model airplane hobby area from the Organized Athletics zone to the Fairgrounds zone;
- relocation of the shooting range from the Organized Athletics zone to the Range and Court Sports Zone; and
- realignment and improvement of Lario Creek/Zone 1 Ditch.

Due to safety concerns to model airplane users from high-voltage transmission lines and the water conveyance needs for the Zone 1 Ditch, these proposals were removed from the MDPI.

Other differences between this initial proposal and the current proposal are the locations of the splash park, welcome center, and community garden, along with elimination of other recreational facilities. Since this initial proposal was not acceptable to several stakeholders and would result in greater impacts than the proposed MDPI, it has been rejected from further consideration.

6.3 ALTERNATIVES CARRIED FORWARD FOR DETAILED CONSIDERATION

The analysis of each of the project alternatives identified below includes the following:

- A description of the alternative.
- An analysis of environmental impacts and a comparison to the possible impacts of the proposed project. Pursuant to the CEQA Guidelines, if an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed.
- An assessment of the alternative's ability to meet the project objectives (previously identified in Section 6.1.2).

The comparison of impacts between each alternative and the proposed MDPI assumes that the general nature and types of existing Standard Conditions/Requirements (SCs), Project Design Features (PDFs), and Mitigation Measures (MMs) identified in Section 5.0 under each environmental issue would also be implemented for each of the project alternatives, where appropriate. No PDFs or MMs are applied to the No Project/No Action Alternative, which assumes that the existing conditions at the WND BRA will remain unchanged.

6.3.1 NO PROJECT/NO ACTION ALTERNATIVE

This EIR section provides two No Project Alternatives analyses. The purpose of describing and analyzing a No Project Alternative is to allow decision-makers to compare the impacts of approving the proposed MDPI with the impacts of not approving the proposed MDPI.

Consistent with CEQA Guidelines Section 15126.6(e)(3)(B), the No Project/No Action Alternative is the circumstance under which the MDPI does not proceed. Under one alternative scenario, the WND BRA remains in its existing state and no changes occur, since no programs, facilities, or improvements would be implemented within the WND BRA by the WCA or its partner agencies.

CEQA Guidelines Section 15126.6(e)(3)(A) identifies the No Project Alternative as the continuation of the existing plan, policy, or operation into the future. Typically, this is a situation where the existing plan will continue if a new plan is not developed. Thus, the projected impacts of the proposed plan or alternative plans would be compared to the impacts that would occur under the existing plan. Therefore, the other No Project Alternative (or Current Master Plan Alternative) addressed later in this section assumes development of the WNCBRA with the proposed facilities called out in the 1996 *Whittier Narrows Dam Master Plan*, which is used by the USACE in allowing future uses or activities in the WNCBRA.

Description of the Alternative

The No Project/No Action Alternative assumes the retention of the site in its existing condition, since the MDPI would not be approved and the WCA or its partner agencies would not spearhead any programs or projects in the WNCBRA. As described in Section 3.0, Environmental Setting, the 1,500-acre project site is currently developed with flood risk management facilities, various recreational uses, agricultural fields, and a wastewater treatment plant. On-site vegetation includes natural and riparian vegetation along the Rio Hondo, San Gabriel River, Natural Area, and conservation pool, with introduced species at developed and recreational areas. The No Project/No Action Alternative assumes existing uses on site would remain and the recreational and non-recreational uses at the WNCBRA would continue to operate. Visitation is assumed to remain stable at 2 to 2.6 million visitors per year (similar to visitation estimates in 2006 to 2009).

Comparative Analysis of Environmental Impacts

Aesthetics

The No Project/No Action Alternative does not involve any development or change in current uses at the WNCBRA. There would be no change to the visual quality or character of the project site or surrounding areas. Aesthetic changes associated with development of the project site would not occur with this alternative. No aesthetic impacts related to visual changes or new sources of light and glare would occur under this alternative. This alternative would have less impact on aesthetics than the proposed MDPI.

Agriculture and Forest Resources

Existing agricultural uses on the site would remain under this alternative. No conversion of agricultural uses would occur and no impact to farmlands, forest lands, or timberland would occur. This impact is the same as the impact of the proposed MDPI.

Air Quality

The No Project/No Action Alternative would not involve any construction activities (i.e., grading, excavation, and building construction). Therefore, this alternative would avoid short-term significant and unavoidable construction-related local and regional air quality impacts that would add the existing violations of clean air standards in the South Coast Air Basin. Also, no increases in long-term air quality emissions associated with new vehicular trips and operational activities that may be generated by new recreational facilities at the WNCBRA would occur. As such, the air quality impacts of this alternative would be substantially less than the impacts of the proposed MDPI.

Biological Resources

No disturbance of existing plant and animal habitats would occur under the No Project/No Action Alternative. At the same time, invasive species in the rivers, natural areas, and conservation pool would remain. No habitat restoration or riparian enhancement efforts would be implemented under this alternative. Thus, this alternative would have greater impacts on biological resources than the proposed MDPI.

Cultural Resources

No changes to existing facilities would occur under this alternative; therefore, no ground disturbance would be required. Cultural resources and foundation remains would not be disturbed under this alternative and any cultural resources at the WNDBRA would remain in place. Thus, the No Project/No Action Alternative would avoid any potentially significant impacts to known and unknown historic, archaeological, and/or paleontological resources. This alternative would result in less impact on cultural resources than the proposed MDPI.

Geology and Soils

The No Project/No Action Alternative would not involve grading or excavation activities that would be required to construct new recreational facilities or improvements at the WNDBRA, as proposed in the MDPI. With no ground disturbance, no increase in exposure to geologic and seismic hazards at the WNDBRA would occur. This alternative would result in less impact on geology and soils than the proposed MDPI.

Hazards and Hazardous Materials

With no construction activities or new facilities at the WNDBRA, no increase in the use of hazardous materials at the WNDBRA would occur. This alternative would result in less impact related to hazards and hazardous materials than the proposed MDPI.

Hydrology and Water Quality

Under this alternative, the existing hydrology patterns and hydrologic characteristics of the WNDBRA would remain. Compared to the proposed MDPI, there would be no increase in the amount and velocity of surface runoff from individual sites because there would be no increase in impervious surfaces from proposed facilities and improvements. Also, this alternative would not increase the amount of pollutants in storm water runoff. At the same time, proposed water quality improvements at drainage outlets, Green Streets, and storm water BMPs would not be implemented to improve storm water quality. Impacts under this alternative would be the same as the impacts of the proposed MDPI.

Land Use and Planning

Under this alternative, the existing land uses at the WNDBRA would be retained. Existing developments are consistent with the 1996 Whittier Narrows Dam Basin Master Plan and the Open Space land use and zoning designations of the site. As with the proposed MDPI, this alternative would not result in any significant land use impacts.

Mineral Resources

No demand on mineral resources for construction would occur under the No Project/No Action Alternative. This alternative would result in less impact on mineral resources than the proposed MDPI.

Noise

The No Project/No Action Alternative would not involve any construction activities; therefore, noise and vibration effects associated with construction would not occur. Additionally, with no new recreational facilities, no increase in long-term, traffic-related and stationary noises would occur at the WNCBRA. This alternative would result in less impact related to noise than the proposed MDPI.

Population, Housing, and Employment

Under this alternative, no additional employment opportunities would be provided, and there would be no major change in the number of visitors to the WNCBRA. No impacts on population, housing, and employment would occur, similar to the proposed MDPI. This alternative would have less beneficial impacts related to employment than the proposed MDPI.

Public Services

The No Project/No Action Alternative would not place new demands on public services (fire protection and police protection) because no new recreational uses would be developed at the WNCBRA. This impact is less than the impact of the proposed MDPI. No demand for school and library services would occur, similar to the proposed MDPI.

Parks and Recreation

This alternative would not create a demand for recreational services and facilities, similar to the proposed MDPI. At the same time, this alternative would not address the demand for recreation from the surrounding areas and the County. This alternative would have less beneficial impacts related to recreation than the proposed MDPI.

Transportation and Circulation

The No Project/No Action Alternative would not change the existing traffic conditions on area streets and freeways because no new facilities or improvements would occur at the WNCBRA. No short-term (construction) or long-term (operational) traffic trips would be generated. At the same time, existing traffic congestion at the Rosemead Boulevard and San Gabriel Boulevard/Durfee Avenue intersection and the lack of parking in Area A and during large events at the WNCBRA would remain. Also, Green Streets, traffic calming measures, and entry signage would not be implemented to improve local circulation. However, no new vehicle trips would be generated since no new facilities are proposed. This alternative would result in less impact on transportation and circulation than the proposed MDPI.

Utilities and Service Systems

The No Project/No Action Alternative would not place new demands on utilities and service systems because no new facilities would be developed at the WNCBRA. Under this alternative, no utility upgrades would be necessary and no physical impacts would result. This alternative would result in less impacts on utilities and service systems than the proposed MDPI.

Greenhouse Gas Emissions

This alternative would not change or increase the amount and type of greenhouse gas (GHG) emissions generated by on-site uses and visitors, and would avoid any increase in GHG emissions. This impact would be less than the impacts of the proposed MDPI.

Conclusion

The No Project/No Action Alternative would not result in environmental changes or impacts over existing conditions, and would avoid the significant unavoidable impacts that would occur with implementation of the proposed MDPI, including (1) short-term, construction-related air quality impacts; and (2) long-term operational air quality impacts. For the remaining environmental issues, the proposed MDPI would have less than significant impacts or potentially significant impacts that can be mitigated to less than significant levels.

This alternative does not reflect the MDPI's vision for Restoration, Reconnection, River Enhancement and Recreation. Also, the No Project/No Action Alternative would not meet any of the project's Resource Objectives identified in Section 6.1.2 of this EIR. Retention of the WNDDBRA in its existing condition would not lead to the restoration of natural habitats along the Rio Hondo and San Gabriel River and would not meet the recreational needs of the surrounding areas, the San Gabriel Valley, and the County. Additionally, this alternative would not protect existing natural areas from invasive plant species and human intrusion, nor would it improve storm water quality; water conservation; biodiversity; habitat connectivity; ecosystem functions; and recreation, education, interpretation, and employment opportunities at the WNDDBRA.

6.3.2 CURRENT MASTER PLAN ALTERNATIVE

Description of the Alternative

Section 15126.6(e)(2) of the CEQA Guidelines specifies that the "No Project analysis shall discuss the existing conditions at the time the Notice of Preparation (NOP) is published, as well as what would be reasonably 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". This alternative assumes future improvements in the WNDDBRA pursuant to the 1996 *Whittier Narrows Dam Master Plan*, which regulates allowable uses and facilities on the site. This Master Plan is used by the USACE to evaluate proposals for new uses at the WNDDBRA.

To date, a number of facilities are proposed in the current Master Plan that are yet to be developed. These include:

- An overnight camping at the existing plant nursery at the end of Rush Street (Area A).
- Expansion of the Whittier Narrows Golf Course along the western side of the Rio Hondo Channel.
- An open air amphitheater for 6,000 to 8,000 persons at the northeastern corner of SR-60 and Rosemead Boulevard (Area B), with a mitigation area for the amphitheater to be located west of Wastewater Reclamation Plant (Area C).
- Active recreational facilities (e.g., grand prix racing, roller hockey, water play park, golf driving range, or other commercial recreation facilities) for the area north of SR-60 and west of Santa Anita Avenue (Area B).
- Passive picnic area and trails within the conservation pool/recharge basin.

This alternative assumes that the facilities above would be developed in the WNCBRA, instead of those set forth in the proposed MDPI.

Comparative Analysis of Environmental Impacts

Aesthetics

This alternative would retain existing recreational uses on the site, with new uses proposed at selected locations. These new facilities would change the visual character of the WNCBRA, similar to the proposed MDPI. With implementation of the mitigation measures in Section 5.1, Aesthetics, of this EIR, impacts would be less than significant. However, the current Master Plan does not include programs to improve the aesthetics of the WNCBRA, as proposed in the MDPI (such as PDF 5.1.1, Signage Master Plan; PDF 5.1.2, Identity and Branding Program; PDF 5.1.3, Volunteer Cleanup Activities; and PDF 5.1.4, Green Streets). Thus, no unified character for the WNCBRA would be created, nor would improvements to local streets and trash cleanup occur. The impact of this alternative would be greater than the impact of the proposed MDPI.

Agriculture and Forest Resources

This alternative would lead to the displacement of the existing plant nursery at the western end of Rush Street (Area A) and the community gardens at the Santa Anita Avenue on-ramps to SR-60 (Area B). An overnight camping area is proposed at Area A, and grand prix racing, roller hockey, a water play park, a golf driving range, or another commercial recreational facility are proposed at Area B. Since no displacement of agricultural uses would occur under the proposed MDPI, this alternative would result in greater impacts to agriculture and forest resources than the proposed MDPI.

Air Quality

Development of this alternative would occur on five separate areas of the WNCBRA and would lead to construction emissions that would add to air pollution levels in the South Coast Air Basin. Increases in the number of visitors to the WNCBRA would also lead to vehicle and stationary emissions that would add to existing air pollution levels. A different set of facilities and improvements are proposed under the current Master Plan than called out in the proposed MDPI. However, construction and operational emissions from this alternative are expected to result in about the same impacts on air quality as the emissions that would be generated by facilities proposed in the MDPI.

Biological Resources

This alternative includes the expansion of the Whittier Narrows Golf Course into the western edge of the Rio Hondo and the construction of trails and passive recreational areas at the conservation pool. These facilities would disturb the natural vegetation present in these areas. Also, the current Master Plan does not propose habitat conservation and habitat restoration efforts along the Rio Hondo, San Gabriel River, Natural Area, and conservation pool. Thus, greater impacts on biological resources would occur under this alternative than the proposed MDPI.

Cultural Resources

Development under this alternative would lead to potential disturbance of known and unknown cultural resources in the WND BRA. However, since only five separate areas would be disturbed, this alternative would result in less impact on cultural resources than the proposed MDPI.

Geology and Soils

Similar to the proposed MDPI, this alternative would require grading and earth movement at various sites in the WND BRA. With only five areas of disturbance this alternative would result in less impact related to exposure to on-site geologic and seismic hazards than the proposed MDPI.

Hazards and Hazardous Materials

As with the proposed MDPI, construction and maintenance activities would have the potential to utilize hazardous materials. With fewer facilities under the current Master Plan, the use of hazardous materials under this alternative would be less than hazardous materials use expected under the proposed MDPI.

Hydrology and Water Quality

As with the proposed MDPI, new facilities developed under this alternative would result in an increased amount and velocity of surface water runoff compared to existing conditions due to the increased amount of impervious surfaces. Changes in hydrology would be confined to five separate areas of the WND BRA under this alternative. With fewer visitors, sources of storm water pollutants would also be less. However, proposed water quality improvements at drainage outlets, Green Streets, and storm water BMPs would not be implemented to improve storm water quality at the WND BRA. Thus, this alternative would result in greater impacts related to hydrology and water quality than the proposed MDPI.

Land Use and Planning

The Current Master Plan Alternative is consistent with existing regulations for the WND BRA, and thus, no conflict with existing plans would occur. This alternative would result in less impact related to land use and planning than the proposed MDPI.

Mineral Resources

Demand for aggregate resources would be needed for construction of the proposed facilities under the current Master Plan. With fewer facilities to be developed, this alternative would result in less impact related to mineral resources than the proposed MDPI.

Noise

Implementation of this alternative would involve construction activities, vehicle trips, and on-site activities, generating noise impacts in and near the WND BRA. While fewer facilities would be developed, the noise impacts of this alternative are expected to be greater than the impacts of the proposed MDPI due to a proposed commercial recreational facility at the eastern end of the WND BRA and a larger amphitheater.

Population, Housing, and Employment

Implementation of this alternative would generate new employment opportunities at the WNCBRA, as well as increase the number of visitors to the site. However, with fewer facilities, less employment and fewer visitors are expected under this alternative than the proposed MDPI. Impacts would be less beneficial under this alternative than the proposed MDPI.

Public Services

This alternative would create new demands for police protection and fire protection services, but these demands would be less than the demand of the proposed MDPI because fewer facilities and visitors are expected under this alternative. However, large events at the amphitheater and the commercial recreational facility may require greater traffic and crowd control services from the Sheriff's Department. No demand for school or library services would occur, similar to the proposed MDPI.

Parks and Recreation

The implementation of the current Master Plan would lead to the development of additional recreational uses at the WNCBRA, which would address selected needs of the surrounding areas, the San Gabriel Valley, and the County. However, with fewer facilities, this alternative would result in less beneficial impacts related to recreation would than the proposed MDPI.

Transportation and Circulation

Short-term, construction-related traffic and long-term vehicle traffic would occur due to new recreational facilities that would be developed under this alternative. While fewer facilities would be developed at the WNCBRA under this alternative, the potential traffic impacts would depend on the trip generation that would accompany the proposed amphitheater and the selected commercial recreational uses (e.g., grand prix racing, roller hockey, water play park, golf driving range, or other commercial recreational facilities) at the northwestern corner of the Santa Anita on-ramp to the SR-60. The current Master Plan would allow the development of an amphitheater to accommodate 6,000 to 8,000 people, while the MDPI proposes an amphitheater for 550 people. Traffic impacts would be greater from these larger facilities than those proposed in the MDPI.

Utilities and Service Systems

This alternative would lead to new recreational facilities that would create additional demands on local utility providers. These demands are expected to be less than the demands from the proposed MDPI since fewer facilities and visitors are expected under this alternative, except during large events at the amphitheater or commercial recreational facility.

Greenhouse Gas Emissions

This alternative would generate greenhouse gas emissions during construction and operation of the new recreational facilities. The construction GHG emissions are expected to be less than the GHG emissions from the proposed MDPI since fewer facilities would be built. However, more GHG emissions would be generated by the greater number of visitors to the amphitheater and commercial recreation use that are expected under this alternative.

Conclusion

Based on the additional recreational facilities that would be developed under the Current Master Plan Alternative, this alternative would result in less impacts on cultural resources; geology and soils; hazards and hazardous materials; land use and planning; mineral resources; population, housing, and employment; and utilities than the proposed MDPI. Air quality impacts are expected to be the same and would be significant. Impacts on aesthetics, agricultural resources, biological resources, hydrology and water quality, noise, recreation, greenhouse gas emissions, and public services would be greater. Impacts on traffic cannot be readily compared since this alternative will have higher peak trip generation but fewer average daily trips.

This alternative does not reflect the MDPI's vision for Restoration, Reconnection and River Enhancement. However, it would meet the need for Recreation. This alternative would meet the project's Resource Objectives for Flood Protection and Recreation. However, it would not meet the other objectives for Water Conservation, Water Quality, Habitat Connectivity, Ecosystem Functions, Biodiversity, Education and Interpretation, and Buffers, which are primarily related to the improvement of the natural environment at the WND BRA. Additionally, this alternative would not improve the identity or aesthetic quality of the WND BRA or reduce the significant unavoidable impacts related to air quality.

6.3.3 REDUCED FACILITIES ALTERNATIVE

Description of the Alternative

The purpose of this alternative is to reduce the demand-driven impacts of the proposed MDPI, including the amount of construction-related impacts (primarily associated with air quality emissions) and the amount of new facilities to address long-term operational impacts associated with air quality, which have been determined to be significant unavoidable impacts of the proposed MDPI.

Under this alternative, proposed facilities and improvements under the MDPI would be limited to those that would have minimal impacts on air quality and traffic. Thus, the skate park or court sports and the additional soccer fields in Planning Area A, the amphitheater in Planning Area B, the splash park in Planning Area D, and the performance pavilions in Planning Area F would be eliminated from the proposed facilities. All other proposed facilities, programs, and improvements in the MDPI would be retained and implemented under this alternative, as would the operational and administrative actions. Visitation is assumed to remain stable in the 2 to 2.6 million visitors per year range, or grow at a rate proportional to projected population increase for the region.

Comparative Analysis of Environmental Impacts

Aesthetics

This alternative would retain existing recreational uses on the site, with new uses proposed at selected locations. These new facilities would change the visual character of the WND BRA, similar to the proposed MDPI. This alternative also assumes implementation of the programs to improve the aesthetics of the WND BRA, as proposed in the MDPI (such as PDF 5.1.1, Signage Master Plan; PDF 5.1.2, Identity and Branding Program; PDF 5.1.3, Volunteer Cleanup Activities; and PDF 5.1.4, Green Streets) and the mitigation measures in Section 5.1, Aesthetics, of this EIR. Thus, this alternative would result in less impact related to aesthetics than the proposed MDPI.

Agriculture and Forest Resources

This alternative would not lead to the displacement of the existing plant nurseries and agricultural fields at the WNCBRA, similar to the proposed MDPI. This impact is similar to the impact of the proposed MDPI.

Air Quality

Development of facilities and improvements under this alternative would occur throughout the WNCBRA and would lead to construction emissions that would add to air pollution levels in the South Coast Air Basin. Increases in the number of visitors to the WNCBRA would also lead to vehicle and stationary emissions that would add to existing air pollution levels. However, fewer facilities and improvements are proposed under this alternative than called out in the proposed MDPI. Thus, construction and operational emissions from this alternative are also expected to be less than those generated by facilities under the proposed MDPI.

Biological Resources

This alternative includes habitat conservation, riparian enhancement, and habitat restoration efforts along the Rio Hondo, the San Gabriel River, Natural Area, and conservation pool, as proposed under the MDPI. With the elimination of several recreational facilities from development in the WNCBRA, less impact on biological resources would occur under this alternative than the proposed MDPI.

Cultural Resources

Development under this alternative would lead to potential disturbance of known and unknown cultural resources in the WNCBRA. However, since less land area would be disturbed, there would be less impact on cultural resources under this alternative than under the proposed MDPI.

Geology and Soils

Similar to the proposed MDPI, this alternative would require grading and earth movement at the WNCBRA. With less ground disturbance and the potential for fewer visitors, there would be less impact related to exposure to on-site geologic and seismic hazards under this alternative than under the proposed MDPI.

Hazards and Hazardous Materials

As with the proposed MDPI, construction and maintenance activities would have the potential to utilize hazardous materials. With fewer facilities proposed under this alternative, the use of hazardous materials during maintenance activities would also be less under this alternative than the hazardous materials use expected under the proposed MDPI.

Hydrology and Water Quality

As with the proposed MDPI, new facilities developed under this alternative would result in an increased amount and velocity of surface water runoff compared to existing conditions due to the increased amount of impervious surface. However, changes in hydrology would be confined to a smaller area of the WNCBRA. With fewer visitors and vehicles, sources of storm water pollutants would also be less under this alternative. Green Streets, Storm water BMPs, and

water quality improvements at drainage outlets would still be implemented under this alternative, as with the MDPI. Thus, this alternative would result in less impact related to hydrology and water quality than the proposed MDPI.

Land Use and Planning

This alternative would not displace any existing recreational uses at the WNCBRA and would not conflict with existing land use and zoning designations for the WNCBRA. While not consistent with the *Whittier Narrows Dam Master Plan*, this alternative would not result in any significant land use impacts. This impact is similar to the impact of the proposed MDPI.

Mineral Resources

Demand for aggregate resources would be needed for construction of the proposed facilities under this alternative. With fewer facilities to be developed, this alternative would result in less impact on mineral resources than the proposed MDPI.

Noise

Implementation of this alternative would involve construction activities, vehicle trips and on-site activities, generating noise impacts in and near the WNCBRA. However, noise impacts associated with the amphitheater, splash park, skate park or court sports, additional soccer fields, or performance pavilions, would not occur under this alternative. With fewer facilities to be developed and with fewer visitors expected, less noise impacts are expected under this alternative than under the proposed MDPI.

Population, Housing, and Employment

Implementation of this alternative would generate new employment opportunities at the WNCBRA, as well as increase the number of visitors to the site. However, with fewer facilities, less employment and fewer visitors are expected under this alternative than under the proposed MDPI. Less beneficial impacts related to employment would occur under this alternative than under the proposed MDPI.

Public Services

This alternative would create new demands for police protection and fire protection services, but these demands would be less than the demand of the proposed MDPI because fewer facilities and visitors are expected under this alternative than under the MDPI. No demand for school or library services would occur, similar to the proposed MDPI.

Parks and Recreation

The implementation of this alternative would lead to the development of additional recreational uses at the WNCBRA, which would address selected recreational needs of the surrounding areas, the San Gabriel Valley, and the County. However, with fewer facilities, this alternative would result in less beneficial impacts related to recreation than the proposed MDPI.

Transportation and Circulation

Short-term construction-related traffic and long-term vehicle traffic would occur due to new recreational facilities that would be developed under this alternative. With fewer recreational facilities to be developed at the WNDBRA under this alternative, there would also be less traffic impacts than under the proposed MDPI.

Utilities and Service Systems

This alternative would create new demands on local utility providers. These demands are expected to be less than the demands from the proposed MDPI since fewer facilities and visitors are expected under this alternative.

GHG Emissions

This alternative would generate GHG emissions during construction and operation of the new recreational facilities. These GHG emissions are expected to be less than the GHG emissions from the proposed MDPI since fewer facilities and visitors are expected under this alternative.

Conclusion

Based on the elimination of several recreational facilities that would otherwise be developed under the proposed MDPI, this alternative would result in less impact than the proposed MDPI on most issue areas, except for impacts on agricultural resources and land use and planning, which would be similar to the proposed MDPI. There would be less beneficial impacts on recreation due to the elimination of the skate park or court sports and additional soccer fields in Planning Area A, the amphitheater in Planning Area B, splash park in Planning Area D, and the performance pavilions in Planning Area F.

This alternative reflects the MDPI's vision for Restoration, Reconnection, and River Enhancement and Recreation. This alternative would also meet all the project's Resource Objectives for Flood Protection, Water Conservation, Water Quality, Habitat Connectivity, Ecosystem Functions, Biodiversity, Education and Interpretation, and Buffers. It would also meet the Resource Objectives for Recreation, although to a lesser degree with the reduction in recreational facilities that would be developed at the WNDBRA. Specifically, objectives AR-1, R-2, AR-3, AR-7 and AR-8 would only be partially met with the elimination of the skate park or court sports, amphitheater, splash park and performance pavilions.

The Reduced Facilities Alternative, as discussed above, would reduce potentially significant environmental impacts on air quality, but would not eliminate them. Due to existing violations of clean air standards in the South Coast Air Basin, this alternative would still have significant unavoidable impacts on air quality.

6.3.4 CONSERVATION ONLY ALTERNATIVE

Description of the Alternative

The purpose of the Conservation Only Alternative is to avoid the significant unavoidable impacts of the proposed MDPI on air quality, while promoting its benefits for habitat restoration and conservation. Under this alternative, no new recreational facilities, natural area parks, or river crossings would be implemented at the WNDBRA. However, programs for Arundo Removal and Riparian Enhancement, Reintroduction of Native Species, Water Quality Improvement

Programs, Storm water BMPs, and Green Streets would be implemented. Under this alternative, the operational programs and administrative actions called out in the MDPI would still be implemented. Visitation is assumed to remain stable at 2 to 2.6 million visitors per year.

Comparative Analysis of Environmental Impacts

Aesthetics

This alternative would retain existing recreational uses in the WND BRA. Habitat conservation and restoration efforts would occur along the Rio Hondo, the San Gabriel River, Natural Area, conservation pool, and the Conservation Zone of the MDPI. Changes in visual quality would be limited and introduction of natural areas would create a more natural environment at the WND BRA. This alternative would result in less impact than the proposed MDPI.

Agriculture and Forest Resources

Existing agricultural uses on the site would remain under this alternative. No conversion of agricultural uses or impacts to farmland, forest lands, or timberland would occur. This alternative results in the same impacts as the proposed MDPI.

Air Quality

The Conservation Only Alternative would not involve any construction activities (including grading, excavation, and building construction), except for ground disturbance needed for the invasive species removal, riparian enhancement, native species reintroduction, water quality improvement programs, storm water BMPs, and Green Streets. Therefore, this alternative would avoid short-term significant and unavoidable construction-related local and regional air quality impacts that would occur with the proposed MDPI due to the existing violations of clean air standards in the South Coast Air Basin. Also, no increases in long-term air quality emissions associated with vehicular and operational activities at the WND BRA would occur. As such, there would be substantially less air quality impacts under this alternative than under the proposed MDPI.

Biological Resources

No removal or disturbance of existing plant and animal habitats would occur under this alternative. Rather, invasive species in the rivers, natural areas, and conservation pool would be removed and habitat restoration efforts would be implemented in the Conservation Zone. Thus, this alternative would result in more beneficial impacts on biological resources than the proposed MDPI.

Cultural Resources

No changes to existing facilities would occur under this alternative; therefore, no earthwork or grading would be required. Cultural resources and foundation remains would not be disturbed under this alternative, and the resources would remain in place. Activities would be limited to invasive species removal, revegetation, and storm water quality improvement programs. Thus, this alternative would avoid any potentially significant impacts to known and unknown historic, archaeological, and/or paleontological resources. This alternative would result in less impact related to cultural resources than the proposed MDPI.

Geology and Soils

The Conservation Only Alternative would not involve grading or excavation activities that would be required to construct new recreational facilities or improvements at the WNDBRA, as proposed in the MDPI. With no ground disturbance and no expected increase in visitors, no increase in exposure to geologic and seismic hazards of the site would occur. Impacts related to geology and soils from this alternative would be less than the impacts from the proposed MDPI.

Hazards and Hazardous Materials

With no construction activities or new facilities at the WNDBRA, no increases in the use of hazardous materials at the WNDBRA would occur. This alternative would result in less impact related to hazards and hazardous materials than the proposed MDPI.

Hydrology and Water Quality

Under this alternative, the existing hydrology patterns and hydrologic characteristics of the WNDBRA would remain the same. Compared to the proposed MDPI, there would be no increase in the volume or velocity of surface runoff from the WNDBRA because there would be no increase in impervious surfaces from proposed facilities and improvements. Also, this alternative would not increase the amount of pollutants in storm water runoff. Water quality improvement programs would improve storm water quality at the WNDBRA. Impacts under this alternative would be less than under the proposed MDPI.

Land Use and Planning

Under this alternative, the existing land uses at the WNDBRA would be retained, and no new uses are proposed. No conflicts with existing plans would occur under this alternative. This alternative would result in less impact related to land use and planning than the proposed MDPI.

Mineral Resources

No demand on mineral resources for construction of proposed facilities and improvements would occur under the Conservation Only Alternative. This alternative would result in less impact related to mineral resources than the proposed MDPI.

Noise

The Conservation Only Alternative would not involve any construction activities; therefore, noise and vibration effects associated with the construction activities would not occur. Additionally, with no new recreational facilities, no increases in long-term traffic-related and no new stationary noises would occur. The noise impacts of this alternative would be less than the impacts of the proposed MDPI.

Population, Housing, and Employment

Under this alternative, additional employment opportunities would be limited to those involved in invasive species removal, riparian and natural area revegetation, and storm water quality programs. Also, no major changes in the number of visitors to the WNDBRA would occur. This alternative would have less beneficial impacts related to employment than the proposed MDPI.

Public Services

The Conservation Only Alternative would not place new demands on public services (fire protection and police protection) because no new recreational uses would be developed at the WNDBRA. This alternative would result in less impact related to fire and police protection than the proposed MDPI. No demand for school and library services would occur, similar to the proposed MDPI.

Parks and Recreation

This alternative would not create a demand for recreational services and facilities, similar to the proposed MDPI. At the same time, this alternative would not address the demand for recreation from the surrounding areas, the San Gabriel Valley, and the County. This alternative would have less beneficial impacts related to recreation than the proposed MDPI.

Transportation and Circulation

The Conservation Only Alternative would not cause any major change in existing traffic conditions because no new facilities or improvements would occur at the WNDBRA. Vehicle trips associated with invasive species removal and riparian and natural area revegetation and storm water quality programs would be temporary and minimal and would not create any additional congestion or parking demand. The impacts of this alternative on traffic and circulation would be less than those of the proposed MDPI.

Utilities and Service Systems

The Conservation Only Alternative would not place new demands on utilities and service systems because no new facilities would be developed at the WNDBRA. Under this alternative, no utility upgrades would occur and no physical impacts would result. The impacts related to utilities under this alternative would be less than under the proposed MDPI.

GHG Emissions

This alternative would not change or increase the amount and type of GHG emissions generated by on-site uses and visitors, and thus, would have less impacts related to GHG emissions and climate change than the proposed MDPI.

Conclusion

Based on the analysis above, limited environmental impacts would occur under the Conservation Only Alternative since no new recreational facilities or site improvements would be implemented at the WNDBRA. Habitat conservation and restoration efforts and storm water quality programs would be expanded to benefit the natural environment at the WNDBRA. This alternative reflects the MDPI's vision for Restoration, Reconnection and River Enhancement. However, it would not meet the need for Recreation. This alternative would meet all of the project's Resource Objectives for Flood Protection, Water Conservation, Water Quality, Habitat Connectivity, Ecosystem Functions, Biodiversity, Education and Interpretation, and Buffers. However, it would not meet the Resource Objectives for Recreation, since no new recreational facilities would be developed at the WNDBRA.

6.4 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires the identification of an environmentally superior alternative. Section 15126.6(e)(2) of the CEQA Guidelines states that if the No Project Alternative is the environmentally superior alternative, then the EIR shall also identify an environmentally superior alternative among the other alternatives.

The environmental analysis of alternatives above indicates that, through a comparison of potential impacts from each of the alternatives and the proposed MDPI, the No Project/No Action Alternative would be considered environmentally superior because no new environmental impacts would be introduced into the WNDBRA and the surrounding area. However, this alternative does not reflect the WCA's vision for the WNDBRA and would not meet any of the project's Resource Objectives for the improvement of the natural environment at the WNDBRA and the expansion of recreational opportunities at the WNDBRA to meet demands from the surrounding area. Thus, less beneficial impacts related to biological resources, hydrology and water quality, and recreation would occur under this alternative.

Aside from the No Project/No Action Alternative, the Conservation Only Alternative would also be considered environmentally superior. This alternative would result in no new recreational facilities at the WNDBRA, but programs for Arundo Removal and Riparian Restoration, Reintroduction of Native Species, Water Quality Improvement at Drainage Outlets, Storm water BMPs, and Green Streets would be implemented. Thus, this alternative avoids the unavoidable adverse impacts of the proposed MDPI on air quality. With implementation of the PDFs, SCs, and MMs, all environmental impacts would be reduced to less than significant levels.

This alternative reflects the MDPI's vision for Restoration, Reconnection and River Enhancement. However, it would not meet the need for Recreation. This alternative would meet the project's Resource Objectives for Flood Protection, Water Conservation, Water Quality, Habitat Connectivity, Ecosystem Functions, Biodiversity, Education and Interpretation, and Buffers. However, it would not meet the Resource Objectives for Recreation since no new recreational facilities would be developed to address the recreational needs of the surrounding area, the San Gabriel Valley, and the County.

6.5 REFERENCES

California Office of Administrative Law. 2010 (August 13). *California Code of Regulations* (Title 14, Natural Resources; Division 6, Resources Agency; Chapter 3, Guidelines for Implementation of the California Environmental Quality Act). Sacramento, CA: the State. <http://government.westlaw.com/linkedslice/default.asp?Action=TOC&RS=GVT1.0&VR=2.0&SP=CCR-1000>.

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