

7. Alternatives to the Proposed Project

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 § 15126.6[a]). As required by CEQA, this chapter identifies and evaluates potential alternatives to the proposed project.

Section 15126.6 of the CEQA Guidelines explains the foundation and legal requirements for the alternatives analysis in an EIR. Key provisions are:

- “[T]he discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.” (15126.6[b])
- “The specific alternative of ‘no project’ shall also be evaluated along with its impact.” (15126.6[e][1])
- “The no project analysis shall discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, 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. 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]).
- “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])

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- “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.
- Evaluates the comparative merits of the alternative and the project.

According to Section 15126.6(d) of the CEQA Guidelines, “[i]f an alternative would cause...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.”

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. Transform a dormant, former surface quarry into a productive land use while preserving the majority of the site as natural, open space.
2. Develop first class, modern housing options that meet the needs for market-rate housing and evolving household demographics in Torrance.
3. Provide short-term construction employment opportunities in the South Bay region and long-term housing in Torrance.
4. Provide additional residential opportunities that are consistent with the scale and intensity of the existing land uses along Hawthorne Boulevard.
5. Establish a high-quality architectural community that enhances the area through new development and landscaping along a high visibility corridor.
6. Resolve existing hazardous conditions in an economically feasible way.
7. Preserve significant hilltop open space and retain public access.
8. Cluster development to minimize the overall development footprint.
9. Contribute to diverse housing stock.

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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 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. While the proposed project does not result in any significant impacts, two locations were identified as feasible locations during the public scoping process – (1) the Del Amo Residential site, and (2) the Radium Open Air Market site. Key factors in evaluating the feasibility of potential offsite locations for EIR project alternatives include:

- If it is in the same jurisdiction.
- Whether development as proposed would require a General Plan Amendment.
- Whether the project applicant could reasonably acquire, control, or otherwise have access to the alternative site (or the site is already owned by the proponent). (CEQA Guidelines Section 15126.6[f][1])

7.2.1.1 DEL AMO RESIDENTIAL SITE

The Del Amo Residential Site is comprised of four parcels totaling 15.6 acres located on the northeastern edge of the exiting Del Amo Fashion Center property. The site is bounded by Del Amo Circle East to the west, Fashion Center Way to the North, Madrona Avenue to the east, and Carson Street to the South. This site is located within the Hawthorne Boulevard Corridor Specific Plan (HBCSP) area and is zoned: H-DA-1 (Hawthorne Boulevard Corridor Specific Plan – Del Amo District 1), with a General Plan designation of Commercial Center. Mixed use residential is allowed with a minimum density of 27 dwelling units per acre, and no maximum density.

The proposed project includes the development of 248 multi-family units with no commercial uses. Development of the proposed project's 248 units on the 15.6-acre site would result in a density of 15.89 units per acre, and thus would be below the City's required minimum density for that location of 27 units per acre. Therefore, this alternative would require a General Plan Amendment to be consistent with the reduced density. Development of this site would require demolition of existing structures and related construction activities resulting in similar if not increased construction-related impacts to air quality, noise, and traffic. While the proposed project would involve grading that would likely be greater than what would be required at this alternative location; development of the Del Amo Residential Alternative would require demolition of existing buildings and a similar level of construction activities. As such, construction activities associated with this alternative would result in additional impacts on noise, air quality and construction related traffic compared to the proposed project. Therefore, implementation of this alternative would result in similar if not slightly greater

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impacts than what was evaluated for the proposed project. As this alternative would require a General Plan Amendment and it is not feasible that the applicant would be able to reasonably acquire, control, or otherwise have access to the alternative site, the Del Amo Residential Alternative was rejected from further consideration.

7.2.1.2 THE ROADIUM OPEN AIR MARKET SITE

The Radium Open Air Market site is comprised of three parcels (4067-012-001, 4067-012-014, & 4067-013-001) totaling 14.41 acres and is located at 2500 West Redondo Beach Boulevard in the City of Torrance. The site is currently utilized as an open-air discount market. According to the Radium Open Air Market website, the shopper count averages approximately 40,000 weekly or about 150,000 customers a month. The three parcels have disparate zoning and General Plan designations as follows:

- 4067-012-001 – Zoned C2-PP (General Commercial- Precise Plan), General Plan designation R-OF (Residential Office).
- 4067-012-014 – Zoned R-1 (Single-Family residential District), General Plan designation C-GEN (General Commercial).
- 4067-013-001 – Zoned C3-PP (Solely Commercial District-Precise Plan). General Plan designation C-GEN (General Commercial).

Development of the proposed project on the Radium Open Air Market site would require a General Plan Amendment and a Zone Change, similar to the proposed project. While residential development would be an allowable use on the site with the implementation of a Zone Change (which would require a Conditional Use Permit and a Planned Development), the City's General Plan Land Use Element identifies this site for its historical and current use as a drive-in movie theater and its current use as an open air discount market, allowing for the aforementioned uses. The General Plan envisions neighborhood serving commercial uses or high-density mixed-use development at this site. The Radium Open Air Market site is privately owned, and currently not available for purchase. As this alternative would require a General Plan Amendment and it is not feasible that the applicant would be able to reasonably acquire, control, or otherwise have access to the alternative site, the Radium Open Air Market Alternative was rejected from further consideration.

The project applicant does not own or control any other sites within the jurisdiction of the City of Torrance that are considered feasible alternatives to the proposed project. Since the project applicant cannot reasonably acquire, control, or otherwise access any other sites, and since the analysis of other sites would be speculative without site-specific data, no other sites will be further considered. In general, any development of the size and type proposed by the project would have substantially the same impacts on air quality, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, public services, transportation, tribal cultural resources and utilities. Impacts relating to aesthetics and biological resources would vary dependent on the availability of those resources within the alternative site locations. As described in the DEIR, Chapter 5, Sections 5.1 through 5.14, these impacts were found to be less than significant or less than significant with mitigation incorporated. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR (CEQA Guidelines § 15126[5][B][1]). As there are no identified significant effects of the proposed project, no further analysis of alternative locations is required.

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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/No Development
- Allowable Density Alternative
- Reduced Density Alternative

An EIR must identify an “environmentally superior” alternative. 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. No impacts were found to be significant and unavoidable in the DEIR. Section 7.7 identifies the Environmentally Superior Alternative. Table 7-1, *Comparison of Alternatives* provides a summary of the proposed project and the two identified development alternatives, followed by an analysis of the No Project Alternative in Section 7.4. A density analysis of the proposed project on the entire 24.68-acre site results in a ratio of 10.0 dwelling units per acre (DU/acre), and would support the project's general plan amendment request to change the land use designation from Low-Density Residential (0-9.0 DU/acre) to Low-Medium-Density Residential (9.10-18.0 DU/acre). When viewed as an independent parcel, only the 5.71-acre developable area of Lot 1 was considered, resulting in the proposed project's DU/acre ratio of 43.4. For comparison purposes, the allowable density alternative and the reduced density alternative were analyzed utilizing the available 5.71-acre development area of Lot 1, as presented below.

Table 7-1 Buildout Statistical Summary

	Proposed Project	Allowable Density Alternative	Reduced Density Alternative
Dwelling Units	248	51	188
Maximum Building Height	65	27	55
Population	722 ¹	135 ²	562
Employment	5	0	5
DU/Acre (5.71 acres Lot 1)	43.4	8.9	32.9

¹ The project population estimate used in the EIR was 722, from the Hydraulic Network Analysis for the proposed project, which assumes occupancy of two persons per bedroom and is considered a conservative estimate.

² The project population estimate is based on the average household size in the City of Torrance in 2017, 2.62 persons; see California Department of Finance. 2017. E-5 Population and Housing Estimates for Cities, Counties, and the State, January 2011- 2017. http://www.dof.ca.gov/Forecasting/Demographics/Estimates/E-5/documents/E-5_2017InternetVersion.xls.

7.4 NO PROJECT/NO DEVELOPMENT ALTERNATIVE

In this alternative the proposed project is not built, and the project site remains as is. The backfilled former mine pit would remain as bare land and sparse vegetation, mainly non-native grassland. The upland portion of the project site would remain as vacant land and would continue to operate in its current capacity. Currently,

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the site is private property, signed and partially restricted by fencing on adjacent properties; there are no sanctioned public access points to the site. However, it should be noted that public trespassing onto the property commonly occurs from multiple access points in Palos Verdes Estates, Rolling Hills Estates and Torrance.

7.4.1 Aesthetics

In the No Project/No Development Alternative the project site remains in its current condition; therefore, the existing visual character and resources would remain as is. The various visual changes that would be introduced through development of the site (e.g., landscaping, building form, architectural design, materials and finishes, and lighting) and the amendment to the Torrance General Plan and zone change would not occur under this alternative. Therefore, the existing visual character and resources near and on the project site would be preserved in their current state. Given that no development would occur, no new sources of light or glare would be generated either. Although aesthetics impacts are inherently subjective, the proposed project would improve the vacant, unmaintained site with a new residential building and landscaping. However, this alternative would not alter or impede scenic views from Slope 1 or Slope 3. Therefore, it is concluded that the aesthetics impact for the No Project/No Development alternative (vacant, unmaintained lot) would be less than for the proposed project. As with the proposed project, aesthetic impacts would be considered less than significant.

7.4.2 Air Quality

The No Project/No Development Alternative would not involve construction and operation of land uses that would generate criteria air pollutants and toxic air contaminants. Proposed project impacts respecting construction emissions, operational emissions, consistency with the Air Quality Management Plan, and objectionable odors would all be less than significant without mitigation. Overall, air quality impacts would be reduced by the No Project/No Development Alternative compared to those of the proposed project as no grading, construction or site development would occur.

7.4.3 Biological Impacts

The No Project/No Development Alternative would not involve clearance of the 5.71-acre development area or partial clearance of the 0.99-acre brush management zone within Lot 2. No direct impacts to burrowing owl, toyon chaparral, or to nesting birds would occur; and no indirect impacts to sensitive species or to toyon chaparral—such as noise, lighting, and dust—would occur. All of those impacts of the proposed project would be less than significant with mitigation for the proposed project. Overall, biological resources impacts would be reduced by the No Project/No Development Alternative compared to those of the proposed project.

7.4.4 Cultural Resources

The No Project/No Development Alternative would not involve ground disturbance in the backfilled former mine pit. Impacts of the proposed project to historical and archaeological resources would be less than significant: project development would not diminish the historical significance of any historic properties, and it is expected that mining equipment or other artifacts that could yield information important to the mining

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history of the Palos Verdes Peninsula would have been removed before or during closure of the mine. Overall, cultural resources impacts would be reduced by the No Project/No Development Alternative compared to those of the proposed project.

7.4.5 Geology and Soils

The No Project/No Development Alternative would not involve development of 248 housing units in a site subject to hazards from landslides, small slips during future earthquakes, soils unsuitable for supporting the proposed development, and expansive soils. Geological hazard impacts of the proposed project would be less than significant after compliance with regulations and recommendations of the geotechnical investigation report. The No Project/No Development Alternative would lessen potential for these hazards and impacts would be reduced from the proposed project, as no excavation or grading would occur. The No Project/No Development Alternative would not disturb soil and thus would not potentially damage fossils on the project site. While impacts of the proposed project on fossils would be less than significant with mitigation, these impacts would be non-existent under the No Project/No Development Alternative. Overall, geology and soils impacts would be reduced by the No Project/No Development Alternative compared to those of the proposed project.

7.4.6 Greenhouse Gas Emissions

The No Project/No Development Alternative would not involve development of residential uses that would generate GHG emissions during construction and operation. No construction grading or development activities would occur, and no operational impacts would be introduced involving vehicle traffic and building emissions. Impacts of the proposed project on GHG emissions and on policies and plans for reducing GHG emissions would both be less than significant without mitigation. Overall, GHG impacts would be reduced by the No Project/No Development Alternative compared to those of the proposed project.

7.4.7 Hazards and Hazardous Materials

The No Project/No Development Alternative would not develop residential uses on backfill soil contaminated with arsenic, hexavalent chromium, benzo(a)pyrene, benzene, and tetrachloroethylene, at concentrations above screening levels for residential uses. Impacts of the proposed project arising from contaminated soil and soil vapor would be less than significant after implementation of mitigation including a vapor barrier cap or sub-slab liner; an operations and maintenance monitoring plan for the cap or liner; and institutional controls such as prohibitions on activities that could damage the cap or liner, as required and overseen by the Department of Toxic Substances Control (DTSC).

The No Project/No Development Alternative would not involve construction or operation of land uses; and thus, would not use hazardous materials in construction and operation and would not create hazards arising from accidental release of hazardous materials present on the project site. As no development or occupancy of the site would occur under the No Project/No Development Alternative, there would be no potential for upset of contaminated soil on the site and no potential exposure to site users. While such impacts of the proposed project would be less than significant, impacts from hazards would be reduced under the alternative.

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The No Project/No Development Alternative would not involve development of residential uses next to a Very High Fire Hazard Severity Zone (VHFHSZ). Proposed project development would not exacerbate wildfire risks in VHFHSZs upwind from the project site or within the Development Area and thus, would not expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire. Wildfire hazard impacts of the proposed project would be less than significant, and the No Project/No Development Alternative would not cause wildfire hazard. Overall, hazards and hazardous materials and wildfire impacts would be reduced by the No Project/No Development Alternative compared to those of the proposed project.

7.4.8 Hydrology and Water Quality

The No Project/No Development Alternative would not add impervious areas or otherwise change the hydrology of the project site and would not involve construction or operation of land uses that would generate water contaminants either onsite or offsite. Impacts of the proposed project on hydrology, flooding, and water quality would be less than significant after regulatory compliance. Overall, hydrology and water quality impacts would be reduced by the No Project/No Development Alternative compared to those of the proposed project, as no development and no changes to the site's drainage patterns would occur compared to existing conditions.

7.4.9 Land Use

The No Project/No Development Alternative would not involve construction or operation of the new residential uses onsite. The proposed project was found to be consistent with the City of Torrance General Plan and policies adopted for the purpose of avoiding or mitigating an environmental effect, and with approval of the proposed project's General Plan Amendment, zone change and Precise Plan, impacts would be less than significant. Land use and planning impacts would be reduced by the No Project/No Development Alternative compared to those of the proposed project as no development would occur onsite, and no zone changes or general plan amendment would occur.

7.4.10 Noise

The No Project/No Development Alternative would not involve construction and operation of residences onsite. Proposed project construction would subject nearby residents to noise levels exceeding local standards. Project operation could subject project residents near Hawthorne Boulevard to interior noise levels exceeding local standards. Noise impacts of the proposed project would be less than significant with mitigation. Noise impacts would be nonexistent under the No Project/No Development Alternative as no new development or planned uses would occur and would not result in additional construction or operational noise. Overall, noise impacts would be reduced by the No Project/No Development Alternative compared to those of the proposed project.

7.4.11 Public Services

The No Project/No Development Alternative would not involve development of residential uses that would increase demands for fire protection, emergency medical services, police protection, schools, and library services. Public services related impacts of the proposed project would be less than significant without

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mitigation. Overall, public services impacts would be reduced by the No Project/No Development Alternative compared to those of the proposed project, as no new residential uses would be created in the project area.

7.4.12 Transportation and Traffic

The No Project/No Development Alternative would not involve development of residential uses that would result in an increase of vehicle trips to the local and regional circulation system. Under this alternative, no development would occur on the project site, and therefore no construction traffic or operational traffic would be created as a result. Transportation and traffic impacts of the proposed project would be less than significant with mitigation. Since this No project/No Development Alternative would not add any vehicle trips to the roadway system or involve any construction activities, traffic impacts would be reduced compared to those of the proposed project.

7.4.13 Tribal Cultural Resources

The No Project/No Development Alternative would not involve development onsite that could damage tribal cultural resources (TCRs). No TCRs are expected to be present in backfill soil in the mine pit; however, project construction would involve some disturbance of native soils that could contain TCRs and could damage TCRs on the surface that may not have been identified by the Cultural Resources Investigation. Proposed project impacts to TCRs would be less than significant with mitigation. Overall, tribal cultural resources impacts would be reduced by the No Project/No Development Alternative compared to those of the proposed project since no disturbance of the soils would occur.

7.4.14 Utilities and Service Systems

The No Project/No Development Alternative would not involve development onsite that would generate utility demands or require installation of infrastructure. Proposed project development would generate wastewater; require replacement of existing sewers with larger sewers in Hawthorne Boulevard and 242nd Street; increase water demand; increase solid waste generation; and increase use of electricity, natural gas, and transportation fuels. Proposed project impacts to wastewater treatment capacity; solid waste disposal capacity; and supplies of water, electricity, and natural gas would be less than significant without mitigation. Proposed project impacts to sewer capacity would be less than significant with mitigation. Overall, utilities and service systems and energy impacts would be reduced by the No Project/No Development Alternative compared to those of the proposed project as no development would occur and no additional demand would be added to existing infrastructure.

7.4.15 Conclusion

Compared to the Proposed Project, the No Project/No Development Alternative would reduce impacts to aesthetics, air quality, biological resources, cultural resources, geology and soils, greenhouse gas emissions, hazards and hazardous materials and wildfire hazards, hydrology and water quality, land use and planning, noise, public services, transportation and traffic, tribal cultural resources, and utilities and service systems and energy compared to impacts of the proposed project.

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The No Project/No Development Alternative would not achieve any of the proposed project objectives: transform a reclaimed mine while preserving the majority of the site as natural, open space; develop first class, modern, market-rate housing; provide short-term construction employment and long-term housing in Torrance and the South Bay Region; provide additional residential opportunities consistent with the scale and intensity of existing land uses along Hawthorne Boulevard; enhance the area through new development and landscaping along a high visibility corridor; resolve existing hazardous conditions in an economically feasible way; preserve significant open space and retain existing public access; minimize the development footprint; and contribute to diverse housing stock.

7.5 ALLOWABLE DENSITY ALTERNATIVE

The Allowable Density Alternative would provide for the development of 51 single-family detached homes within the 5.71-acre Lot 1 development area consistent with the existing allowable density of the general plan designation. The proposed project site has a current General Plan designation of Low-Density Residential (R-LO), which allows for development of 0-9.0 dwelling units per acre. Development of the project's 24.68 acres would result in the development of 222 single-family homes within the 24.68-acre site. However, in order to develop these 222 structures, it is assumed that all of Lot 3's 12.92-acres would be developed, and Slope 3 would be substantially graded. However, development of the project site with a more intensive construction scenario would not fulfill the requirements set forth in CEQA Guidelines Section 15126.6(b), which requires that "...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." Therefore, this alternative assumes that all development associated with the Allowable Density Alternative would occur within the 5.71-acre footprint of Lot 1's development area.

The Allowable Density Alternative assumes that the homes would be no higher than 27 feet in height, consistent with the single-family development standards and reviewed under the Hillside and Local Coastal Overlay Zone requirements with implementation of a Precise Plan. In contrast to the proposed project, the Allowable Density Alternative would not require a General Plan Amendment or a zone change, but would similarly require the preparation of a Precise Plan and Tentative Tract Map subdivision activity.

Under this Alternative, it is assumed that all parking would be provided for in private two-car garages as required for single family residences, and with surface parking within the development, and that no parking structure would be constructed. Further, this alternative would reduce the building height of the one- to two-story residential structures to between 14 and 27 feet, which would substantially reduce the visibility of the buildings from Hawthorne Boulevard and Via Valmonte as compared to the proposed project. The decreased density would also allow for more landscaping and open area on the development lot. Due to the reduced density, height and massing, the Allowable Density Alternative would not be readily visible to the five homes located to the northwest of the project site along Via Valmonte

Construction activities would be similar to those anticipated for the proposed project, as this alternative would result in extensive grading with the removal of Slope 2, geotechnical engineering for foundations and footings, and the development of the clean soil cap as required by DTSC. However, grading and excavation activities would be slightly reduced compared to the proposed project as the geotechnical preparation would be reduced

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due to the shallower foundations required for single-family houses. As such, it is anticipated that there would be a reduction in soils export activities. Similarly, building construction and architectural coating would be significantly reduced from those evaluated for the proposed project due to the lower intensity of the development. Under the Allowable Density Alternative, Lots 2 and 3 are retained as natural open space, as with the proposed project.

7.5.1 Aesthetics

Under the Allowable Density Alternative, 51 one- to two-story single-family homes with a maximum height of 14 to 27 feet would be developed, respectively. The Allowable Density Alternative would significantly reduce the aesthetic impacts of the project. The reduced density of development would allow for an increase in landscaping, as well as allow for greater setbacks from Hawthorne Boulevard compared to the proposed project. As discussed in Chapter 5.1, Aesthetics, the proposed project would alter the horizon/skyline of the existing bluff and create buildings visible from various vantage points where no buildings currently exist. Under the proposed project, the residential uses along Via Valmonte would have altered foreground views with development of the residential buildings and the parking structure. Under this alternative, the views from the affected homes on Via Valmonte would be unaltered. As with the proposed project, this alternative would not obstruct existing public scenic views or otherwise substantially impact scenic views or resources. Additionally, the buildings constructed under this alternative would have a maximum height of 14 to 27 feet and would not be visible to the homes along Via Valmonte, thereby reducing potential impact associated with new light sources. As a result, this alternative would result in less impact than the proposed project with regard to aesthetic resources.

7.5.2 Air Quality

The Allowable Density Alternative would result in substantially less construction activity compared to the proposed project due to the decrease in housing units and elimination of the parking structure. While grading and soil hauling activities are anticipated to be similar but slightly reduced, building construction would be substantially reduced under the Allowable Density Alternative. The smaller buildings would also require a reduction in the need for retaining walls and other landform alterations compared to the proposed project. Additionally, operation of the Allowable Density Alternative would result in a reduction in the maximum daily operational phase impacts. Regional emissions would also be reduced due to the reduction in total daily vehicle trips and associated vehicle miles traveled. Proposed or Alternative Project operational impacts would not exceed SCAQMD's threshold levels. The Allowable Density Alternative would reduce air quality impacts compared to the proposed project.

7.5.3 Biological Impacts

While the development intensity of the Allowable Density Alternative is substantially reduced, this alternative assumes the same level of area disturbance within the 5.71 acres of Lot 1. As such, construction and operational activities would disturb a similar amount of native grasslands and special status species. This alternative would therefore be environmentally equal to the proposed project with regard to biological impacts.

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7.5.4 Cultural Resources

This alternative would involve ground-disturbing activities throughout the entire development area. However, grading and excavation activities would be slightly reduced compared to the proposed project as the geotechnical preparation would be reduced due to the shallower foundations required. As a result, this alternative would be slightly less likely to disturb undiscovered cultural resources. Impacts would remain less than significant, and the impacts of the Allowable Density Alternative would be similar, but slightly reduced to those of the proposed project.

7.5.5 Geology and Soils

The Allowable Density Alternative's buildings would have a significantly smaller footprint and significantly shorter building height than those in the proposed project. Smaller footprints and scale of buildings would reduce the need for retaining walls, excavation and grading, and similar landform alteration. While hazards present as relating to geology and soils (such as potential for landslide, soils unsuitable for supporting the proposed development and expansive soils) would still exist on the project site, many impacts would be lessened by the decrease in building excavation and footing depth of single family homes compared to five-story residential development. As with the proposed project, this alternative would be required to comply with the latest California Building Code (CBC) and the site-specific geotechnical report recommendations. Therefore, the impacts to geology and soils from the Allowable Density Alternative would be slightly less, but generally similar to, those of the proposed project. Impacts under this alternative would remain less than significant.

7.5.6 Greenhouse Gas Emissions

The Allowable Density Alternative, like the proposed project, would generate an increase in greenhouse (GHG) emissions onsite and would not exceed the SCAQMD's proposed GHG screening threshold. As with air quality impacts, while grading and soil hauling activities are anticipated to be similar but slightly reduced, building construction would be substantially reduced under the Allowable Density Alternative due to the decrease in density, building footprint and building size, and elimination of the construction of the parking structure. Operational vehicle trips associated with the Allowable Density Alternative would be less than the proposed project due to the decrease in occupancy. GHG emissions under this alternative would be less than under the proposed project. Impacts would remain less than significant.

7.5.7 Hazards and Hazardous Materials

The Allowable Density Alternative would be subject to the same oversight provided for the proposed project by the Department of Toxic Substances Control (DTSC). In October 2017, Torrance entered into a California Land Reuse and Revitalization Agreement Act (CLRRRA) Agreement for regulatory oversight of the environmental aspects of the Project Site with DTSC. The Allowable Density Alternative would still be subject to the regulations and guidelines of federal, state, and local agencies for the use, handling, storage, and transport of hazardous materials. Therefore, impacts would be similar to the proposed project and less than significant.

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7.5.8 Hydrology and Water Quality

This alternative would create significantly smaller building footprints. The smaller structures and building footprints would create slightly less impervious areas on the project site, as additional spaces for landscaping would be introduced. Therefore, this alternative would reduce sheet flow runoff, provide larger landscaped areas for infiltration, and allow for greater flexibility in treating runoff throughout the site. As a result, reduced sheet flow runoff would be easier to control, direct, and detain, thereby reducing potential runoff from the property. As with the proposed project, new infrastructure, such as curbs, gutters, and drains, would be constructed to minimize runoff.

As with the proposed project, neither the construction nor the operation of the Allowable Density Alternative would result in a significant degradation of water quality, or in a violation of any water quality standards. Likewise, neither the construction nor the operation of this alternative would significantly reduce, degrade, or otherwise impact groundwater. The construction and operational impacts of the Allowable Density Alternative would be slightly less due to the reduced intensity of development than those of the proposed project and therefore the impacts to hydrology and water quality would be less.

7.5.9 Land Use

The Allowable Density Alternative would allow for a single-family residential development within the footprint of the proposed project's development area, with less development intensity than the proposed project. This alternative would not require amendments to the General Plan and Zoning Code, but would still require preparation of a Precise Plan. This alternative would clearly be consistent with the requirements of the Hillside and Local Coastal Overlay Zone, adherence to which protects against development infringing on light, air, view, and privacy of the neighborhood. As such, this alternative would have a reduced impact compared to the proposed project, as the proposed project partially obstructs foreground and long-range views from existing uses along Slope 1 and Slope 3. The proposed project would require a General Plan Amendment and a Zone Change, which would not be required under the Allowable Density Alternative. As such, this alternative would have similar, but reduced impacts to the proposed project, which were found to be less than significant.

7.5.10 Noise

Reduction in building development intensity would incrementally reduce the length of project-related construction noise impacts, but not peak construction noise volumes. As described in Section 5.10, peak construction noise is created by grading operations for the proposed project. While grading activities would be reduced under this alternative, the peak construction activity would still occur under this alternative. Due to the peak construction noise volumes and distance to sensitive activities this alternative would be slightly less than the proposed project, but still require mitigation to reduce impacts. During the operational phase, this alternative would be significantly reduced compared to the proposed project due to the reduced intensity of uses. However, no significant operational-related noise impacts were identified for the proposed project. The noise impacts of this alternative would be reduced compared to the proposed project and would be less than significant.

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7.5.11 Public Services

As the Allowable Density Alternative would be located on the same site as the proposed project but would result in a smaller amount and type of development than the proposed project, development under the Allowable Density Alternative would generate a smaller number of new residents than the proposed project. Therefore, impacts to public services would be lesser due to the decrease in project occupants. Accordingly, impacts to fire, police, schools, parks and libraries would be less than significant under Allowable Density Alternative with the payment of required development impact fees and school fees, but reduced from the proposed project.

7.5.12 Transportation and Traffic

Short-term traffic impacts under the Allowable Density Alternative would be similar in nature but slightly less than the proposed project because of the decrease in the number of construction-related trips and length of construction activities. Similar to the proposed project, this alternative would reduce impacts to less than significant levels through the implementation of a construction traffic management plan as required by Mitigation Measure TR-1. Operational impacts would be reduced due to the substantial reduction in trips associated with the Allowable Density Alternative. Therefore, operational traffic impacts would be less under this alternative compared to the proposed project. Overall, impacts to transportation and traffic under the Allowable Density alternative would be lesser than those of the proposed project.

7.5.13 Tribal Cultural Resources

This alternative would involve ground-disturbing activities throughout the entire Lot 1 development area. The decreased density would allow for more landscaping and open area, and actual building footprints would encompass a slightly reduced amount of the site as compared to the proposed project, which would have a reduced likelihood of impacting tribal cultural resources than the proposed project. As a result, this alternative would be slightly less likely to disturb undiscovered tribal cultural resources. Impacts would remain less than significant, and the impacts of the Allowable Density Alternative would be similar but reduced compared to those of the proposed project, as extensive excavation and grading would still occur.

7.5.14 Utilities and Service Systems

Under the Allowable Density Alternative, building square footage and intensity of uses would be substantially reduced compared to the proposed project. Therefore, this alternative would generate less wastewater and consume less water. The solid waste generation of this alternative would also be reduced. Under this alternative, allowable building square footage would be reduced, and the associated energy demand would also be reduced. Construction and operational activities associated with this alternative would have reduced energy demand. Overall, utilities and service systems impacts of this alternative would be reduced compared to the proposed project and would remain less than significant after mitigation, as with the proposed project.

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7.5.15 Conclusion

The Allowable Density Alternative would lessen environmental impacts in the areas of aesthetics, air quality, GHG emissions, hydrology and water quality, land use and planning, noise, public services, transportation and traffic, tribal cultural resources, and utilities and service systems. This alternative would be required to implement all mitigation measures identified for the proposed project in order to ensure that impacts would remain less than significant. However, in accordance with CEQA, significant environmental effects may be avoided or substantially lessened through implementation of feasible alternatives or feasible mitigation measures.

Impacts to biological resources, geology and soils, and hazards and hazardous materials would remain the same as the proposed project. Therefore, this alternative is considered to be environmentally superior to the proposed project.

Under the Allowable Density Alternative, most of the proposed project's objectives would be achieved but to a lesser extent as compared to the proposed project. For example, the Allowable Density Alternative would transform the vacant former mining site and enhance the area with first class, modern housing while preserving the majority of the site for open space (Objectives 1,2,5,7), provide for short-term construction jobs while resolving existing hazardous conditions (Objectives 3,6), and cluster development to minimize the overall development footprint (Objective 8) . However, these objectives would be achieved to a lesser extent given the reduction in development intensity. Additionally, this alternative would not provide additional residential opportunities consistent with development density along portions of Hawthorne Boulevard (Objective 4) or contribute to a diverse housing stock to the same extent as the proposed project (Objective 9).

7.6 REDUCED DENSITY ALTERNATIVE

The Reduced Density Alternative would consist of development of the site with three four-story apartment buildings, comprised of 181-units, as well as a separate three-story 122-space parking garage. The first level of each building would include ground level semi-subterranean parking, with the exception of (Building A, which would be is semi-subterranean,) and ground floor lobbies, with three residential floors on the second through fourth floors. Similar to the proposed project, this alternative assumes that all development associated with the Reduced Density Alternative would occur within the 5.71-acre footprint of Lot 1's development area. The total density for the 181-unit buildings would be 31.69 dwelling units per acre within the 5.71-acre Lot 1, and 7.33 dwelling units per acre within the entire 24.68-acres site.

The proposed breakdown of units would be 99 one-bedroom and 82 two-bedroom units. The residential units would have a finished height of approximately 55 feet, while the parking structure would be approximately 48 feet high. This alternative assumes the same amount of parking being supplied under the three residential buildings as the proposed project, which would result in the parking structure being required to provide 122 spaces. The Reduced Density Alternative would provide the same onsite amenities, including common open space and recreation areas, a pool, and a clubhouse. Landscaping would be provided around the perimeter of Lot 1's development area, the site's entrance and surface parking area, courtyard, and pool area. Under the Reduced Density Alternative, Lots 2 and 3 are retained as natural open space, as with the proposed project.

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The Reduced Density Alternative would result in a similar level of construction intensity, as development of the project site under this alternative would require largely the same construction activities, including grading and soil hauling activities. As such, it is assumed that building pads would be constructed in the same manner as the proposed project, including the amount of excavation and grading, geotechnical engineering, and associated haul trips. It is also assumed that the buildings would have a similar finished floor elevation between 190.5 to 193.5 amsl.

7.6.1 Aesthetics

The Reduced Density Alternative would be located on the same site as the proposed project and would result in a similar type of development as compared to proposed project. This Alternative would introduce development onto a currently vacant site and would result in changes to the aesthetic character. However, the overall size and design of the Alternative would be more in keeping with the surrounding developments, as structures would be at a maximum of 55 feet high, as opposed to 65 feet under the proposed project. Furthermore, the Alternative's overall size would be less than that proposed under the project, such that the Reduced Density Alternative would result in reduced impacts on the residential uses north of the project site on Via Valmonte. Impacts associated with light and glare would also be similar to the proposed project, because interior and exterior artificial light would be necessary, and exterior-building materials would be identical to the proposed project. As with, the proposed project, Mitigation Measure MM-AE-1 would be implemented to reduce light and glare impacts. Overall, aesthetic impacts anticipated under this Alternative would be similar to the proposed project, although slightly less due to the slightly lower building heights and the reduced exterior nighttime lighting requirements and would be less than significant.

7.6.2 Air Quality

Development of the Reduced Density Alternative would result in a substantially similar duration and amount of construction activities as analyzed for the proposed project in the EIR. Although the construction impacts of this Alternative would be slightly reduced than that identified for the proposed project, compliance with the regulations set forth by the SCAQMD and identified for the proposed project would apply to this Alternative. As such, the Reduced Development Alternative would not exceed SCAQMD's daily thresholds for construction related emissions.

Construction of this alternative would not expose sensitive receptors to substantial pollutant concentrations due to project-generated toxic air contaminants. Although construction activities typically generate emissions of toxic air contaminants (e.g., diesel emissions, fumes from paint and solvents), neither the amount of these emissions or the location of such emissions would result in substantial exposure for sensitive receptors in the project vicinity. This impact would be less than significant.

Construction activities associated with this alternative would not generate emissions that would result in an exceedance of localized significance thresholds established by the SCAQMD. This impact would be less than significant.

The maximum daily operational phase regional emissions would also be reduced due to the reduction in total daily vehicle trips and associated vehicle miles traveled. However, project operational impacts would not exceed

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SCAQMD's threshold levels. This alternative would slightly reduce the air quality impacts, which would be less than significant.

7.6.3 Biological Impacts

The building footprints would remain the same for each unit, as would the area of construction in Lot 1. Construction and operational activities would not disturb additional native grasslands and special status species. This alternative would therefore be environmentally equal to the proposed project with regard to biological impacts.

7.6.4 Cultural Resources

This alternative would involve the same amount of ground-disturbing activities, which would have a similar likelihood of impacting archaeological or paleontological resources compared to the proposed project. As a result, this alternative would be just as likely to disturb undiscovered cultural resources. Impacts would remain less than significant, and the impacts of the Reduced Density Alternative would be equal to those of the proposed project.

7.6.5 Geology and Soils

The proposed project's building footprints would remain unchanged in this alternative. Development of a four-story residential building (three stories of residential over one story of parking) rather than a five-story residential building does not impact the grading volumes or slope stability. The proposed project would require the same amount of grading and soil transport as this alternative. The impacts for this alternative would be equal to the proposed project with regard to geology and soils.

7.6.6 Greenhouse Gas Emissions

The Reduced Density Alternative would result in a reduction in overall development by 65 residential units and would decrease vehicle trips compared to the proposed project. Therefore, this alternative would result in a reduction in construction and operational GHG emissions as compared to the project. As with the proposed project, impacts related to GHG emissions would be less than significant.

7.6.7 Hazards and Hazardous Materials

There would be no difference between this alternative and the proposed project in terms of handling, transporting, or disposing of hazardous or potentially hazardous materials. Grading, and excavation activities for the Reduced Density Project could result in the exposure of construction personnel and the public to hazardous substances in the soil. Similar to the proposed project, implementation of the Reduced Density Alternative would involve the use of hazardous materials during construction and could expose construction workers to hazardous materials during grading from contaminated soils. However, construction materials such as fuels, paints, and solvents would be used in limited quantities and would not pose a significant safety hazard. Any remediation would be required to comply with the appropriate standards and guidelines.

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The Reduced Density Alternative would be subject to the same oversight provided under the proposed project by the Department of Toxic Substances Control (DTSC.) In October 2017, Torrance entered into a California Land Reuse and Revitalization Agreement Act (CLRRRA) Agreement for regulatory oversight of the environmental aspects of the Project Site with DTSC. The Reduced Density Alternative would still be subject to the regulations and guidelines of federal, state, and local agencies for the use, handling, storage, and transport of hazardous materials. Therefore, impacts would be similar to the proposed project and remain less than significant.

7.6.8 Hydrology and Water Quality

The construction and operation of the Reduced Density Alternative would be similar to the proposed project and therefore the impacts to hydrology and water quality would be the same. As with the proposed project, neither the construction nor the operation of the Reduced Density Alternative would result in a significant degradation of water quality, or in a violation of any water quality standards. Likewise, neither the construction nor the operation of this alternative would significantly reduce, degrade, or otherwise impact groundwater. Therefore, the hydrology and water quality impacts of this alternative would be similar to those of the proposed project.

7.6.9 Land Use

The Reduced Density Alternative would allow for a residential development within the footprint of the proposed project's development, but with less development intensity than the proposed project. This alternative would also require amendments to the general plan and zoning code. Due to the reduced heights, this alternative would not obstruct the foreground and long-range views from existing uses along Slope 1 and Slope 3 to the same extent as the proposed project. The project's roofline is below the grade of all other residences along Via Valmonte, and this alternative would result in a development that is an additional 10-feet below the grade. As with the proposed project, silhouettes will be necessary to accurately assess whether the scale of the proposed structures is orderly and in harmony with the nearby commercial development and the adjacent residential development during the Precise Plan/entitlement review of the proposed project. Similar to the proposed project, this alternative would require a General Plan Amendment and a Zone Change in order to be consistent with the City's General Plan. Therefore, this alternative would result in slightly reduced, less than significant impacts with regard to land use.

7.6.10 Noise

Reduction in building development intensity would incrementally reduce the length of project-related construction noise impacts, but not peak construction noise volumes. Due to the peak construction noise volumes and distance to sensitive activities this alternative would be slightly reduced compared to the proposed project.

The reduction in vehicle trips would slightly reduce the operational traffic-related noise impacts. However, no significant operational-related noise impacts were identified for the proposed project. Overall, noise impacts of

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this alternative would be slightly reduced compared to the proposed project and would remain less than significant with mitigation.

7.6.11 Public Services

Like the proposed project, this alternative would comply with the California Fire Code, and implementation of existing regulations and standard conditions would ensure that impacts related to fire service are not substantially different from that of the proposed project. As part of the proposed project, public service providers were contacted to determine whether development would adversely impact existing and future planned levels of service and resources. Fire and police protection service providers determined the project would not result in any adverse impacts to their services and resources. As with the proposed project, public service impacts would be slightly lessened due to the decrease in density, and would remain similar and less than significant.

7.6.12 Transportation and Traffic

Circulation, access, and parking on the site would be substantially similar to the proposed project. Access under the Reduced Density Alternative would be similar to the access configuration for the proposed project. Accordingly, review and approval of site plans by the City and its Fire Department before it issues a building permit for this alternative would ensure that development of this alternative does not substantially increase roadway hazards, nor result in inadequate emergency access. Additionally, consistent with the proposed project, the Reduced Density Alternative would not conflict with adopted policies, plans, or programs related to alternative transportation, as the site is well served by public transportation. As such, the Reduced Density Alternative, similar to the proposed project, would result in a less-than-significant impact related to roadway hazards, emergency access, and alternative transportation.

As the Reduced Density Alternative would result in a smaller number of residential units, the number of trips generated daily and during the AM and PM peak hours by the Reduced Density Alternative would be less than the proposed project. Therefore, consistent with the proposed project, all study intersections would operate at an acceptable level of service (LOS) under this alternative. As such, the Reduced Density Alternative would not result in significant traffic impacts at any of the study intersections, and a less-than-significant impact, similar to, but less than, the proposed project, would occur as the number of trips would be reduced compared to the proposed project under the Reduced Density Alternative.

7.6.13 Tribal Cultural Resources

Impacts to tribal cultural resources would be similar for the Reduced Density Alternative as for the proposed project, as the development footprint would be similar. Impacts would be less than significant with implementation of mitigation for both the proposed project and this alternative.

7.6.14 Utilities and Service Systems

Under this alternative, building square footage would be reduced compared to the proposed project. Therefore, this alternative would generate less wastewater and consume less water. The solid waste generation would also

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be reduced. Utilities and service systems impacts of this alternative would be reduced compared to the proposed project and less than significant after mitigation.

Under this alternative, allowable building square footage would be reduced, and the associated energy demand would also be reduced. Construction and operational activities associated with this alternative would have slightly reduced energy demand. Impacts would be similar to the proposed project and remain less than significant.

7.6.15 Conclusion

The Reduced Density Alternative would lessen environmental impacts in the areas of aesthetics, air quality, GHG emissions, noise, public services, transportation and traffic, and utilities and service systems compared to the proposed project. Similar to the Allowable Density Alternative, this alternative would be required to implement all mitigation measures identified for the proposed project in order to ensure that impacts would remain less than significant. However, in accordance with CEQA, significant environmental effects may be avoided or substantially lessened through implementation of feasible alternatives or feasible mitigation measures.

This alternative would have similar impacts in the area of biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, and tribal cultural resources. Overall, this alternative is considered environmentally superior when compared to the proposed project.

Under the Reduced Density Alternative, all of the proposed project's objectives would be achieved but to a lesser extent as compared to the proposed project. For example, the Reduced Density Alternative would transform the vacant former mining site and enhance the area with first class modern housing while preserving the majority of the site for open space (Objectives 1,2,5,7), provide for short-term construction jobs while resolving existing hazardous conditions (Objectives 3,6), provide additional residential opportunities consistent with density of development along Hawthorne Boulevard (Objective 4), cluster development to minimize the overall development footprint (Objective 8) and contribute to a diverse housing stock (Objective 9)..

7.7 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

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

- Allowable Density Alternative

The Allowable Density Alternative has been identified as the environmentally superior alternative. As shown on Table 7-1, this alternative would lessen environmental impacts in the areas of aesthetics, air quality, GHG emissions, hydrology and water quality, land use and planning, noise, public services, transportation and traffic, tribal cultural resources, and utilities and service systems. The alternative would be required to implement all

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mitigation measures identified for the proposed project in order to ensure that impacts would remain less than significant. However, in accordance with CEQA, significant environmental effects may be avoided or substantially lessened through implementation of feasible alternatives or feasible mitigation measures.

This alternative would have similar impacts in the area of biological resources, geology and soils, hazards and hazardous materials, and tribal cultural resources.

Due to the reduction in development intensity, this alternative would reduce the extent to which project objectives are attained. Furthermore, this alternative would not provide additional residential opportunities consistent with development density along portions of Hawthorne Boulevard (Objective 4) or contribute to a diverse housing stock to the same extent as the proposed project (Objective 9). The alternative would, however, be consistent with the type and scale of residential development to the north and northwest along Via Valmonte and to the southeast across Hawthorne Boulevard.

Table 7-1 Summary of Impacts of Alternatives Compared to the Proposed Project

Topic	Proposed Project	No Project/No Build Alternative	Allowable Density Alternative	Reduced Density Alternative
Aesthetics	LTS/M	Less than project LTS	Less than project LTS/M	Less than project LTS/M
Air Quality	LTS	Less than project LTS	Less than project LTS	Less than project LTS
Biological Resources	LTS/M	Less than project LTS	Similar to the project LTS/M	Similar to the project LTS/M
Cultural Resources	LTS/M	Less than project LTS	Similar to the project LTS/M	Similar to the project LTS/M
Geology and Soils	LTS/M	Less than project LTS	Similar to the project LTS/M	Similar to the project LTS/M
Greenhouse Gas Emissions	LTS	Less than project LTS	Less than project LTS	Less than project LTS
Hazards and Hazardous Materials	LTS/M	Less than project LTS	Similar to project LTS/M	Similar to the project LTS/M
Hydrology and Water Quality	LTS	Less than project LTS	Less than project LTS	Similar to the project LTS
Land Use and Planning	LTS	Less than Project LTS	Less than project LTS	Less to the project LTS
Noise	LTS/M	Less than project LTS	Less than project LTS/M	Less than project LTS/M
Public Services	LTS	Less than project LTS	Less than project LTS	Less than project LTS
Transportation and Traffic	LTS/M	Less than project LTS	Less than project LTS/M	Less than project LTS/M
Tribal Cultural Resources	LTS/M	Less than project LTS	Less than project LTS/M	Similar to the project LTS/M
Utilities, Service Systems, and Energy	LTS/M	Less than project LTS	Less than project LTS/M	Less than project LTS/M

Notes: LTS: Less than Significant; LTS/M: Less than Significant with Mitigation Incorporated;

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