

Executive Summary

Introduction

The City of Los Angeles (City) is part of a worldwide movement to re-evaluate attitudes towards consumption, disposal, product stewardship, and infrastructure to reduce plastic waste and promote sustainability. The City proposes to expand upon previously passed ordinances by implementing a city-wide Comprehensive Plastics Reduction Program (Program). The City is evaluating numerous upstream measures to reduce or eliminate the production and use of single-use plastic products, and encourage reuse or recycling of other items to the extent feasible, thereby reducing or eliminating the input of single-use plastics into the City's waste stream and the environment. The Program's upstream elements include the following broad categories:

- Plastic Bottle Policies
- Foodware Policies
- Textile Policies
- Per- and polyfluoroalkyl substances (PFAS) Ban
- Additional Product Bans
- Formation of Working Groups and Additional Studies
- Outreach and Education

The City is also evaluating downstream measures by which to increase the City's ability to manage these materials and divert them from landfill disposal. Downstream measures include collecting, reusing, recycling, and composting alternative materials and supporting reusable products. Downstream measures may include the construction or expansion of recycling and composting facilities; regional market development to expand the City's ability to recycle and reuse currently unmarketable single-use items; and infrastructure to support reusable items. The Program would also include public education, outreach, and engagement as well as enforcement.

Program Location

Implementation of the Program would occur throughout the entirety of the incorporated City of Los Angeles, which encompasses approximately 469 square miles, stretching from the Angeles National Forest to the north to the Pacific Ocean to the south (Figure ES-1).

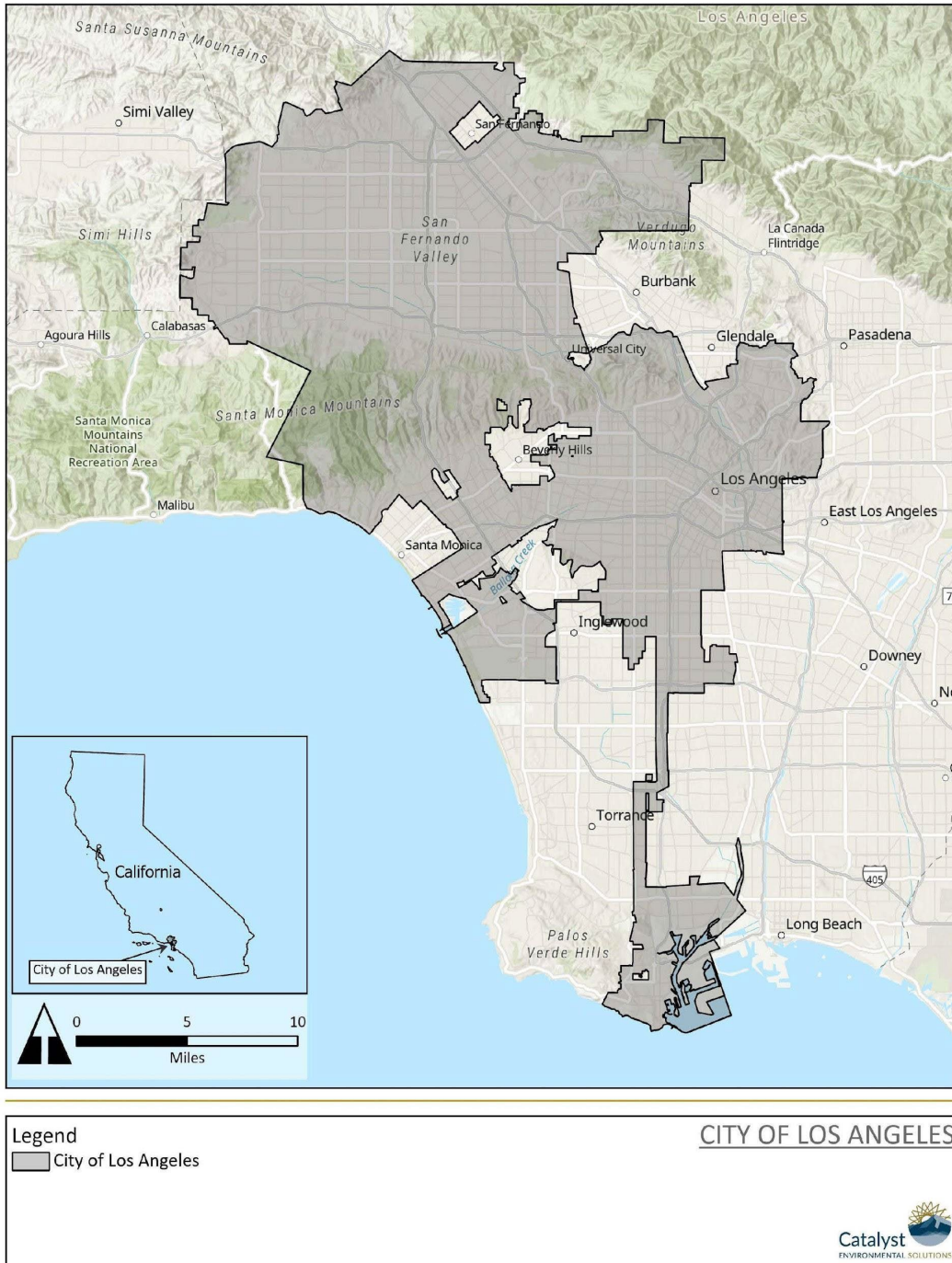


Figure ES-1. Program Location

Program Objectives

CEQA Guidelines Section 15124(b) require the project description to include a statement of objectives for the proposed project, including the underlying purpose of the proposed project. The underlying purpose of the Program is to create a comprehensive city-wide strategy to reduce plastic waste and

reduce the environmental and human health impacts of single-use plastics. To meet this purpose, the objectives are as follows:

- Contribute to the City’s goal of becoming zero waste by 2050.
- Reduce the volume of single-use plastics, particularly those that cannot be composted or recycled in City-contracted facilities, into the City’s waste stream.
- Reduce the amount of plastic waste that is littered and pollutes water resources and has adverse effects on human health and wildlife.
- Encourage and support the use of reusable alternative materials.
- Reduce aesthetic degradation of the City due to plastic litter.
- Develop downstream systems and facilities as needed to support the reuse, recycling, and composting of alternative products to single-use plastics.

Upstream and downstream measures would work together to create a zero waste loop in the City (Figure ES-2).

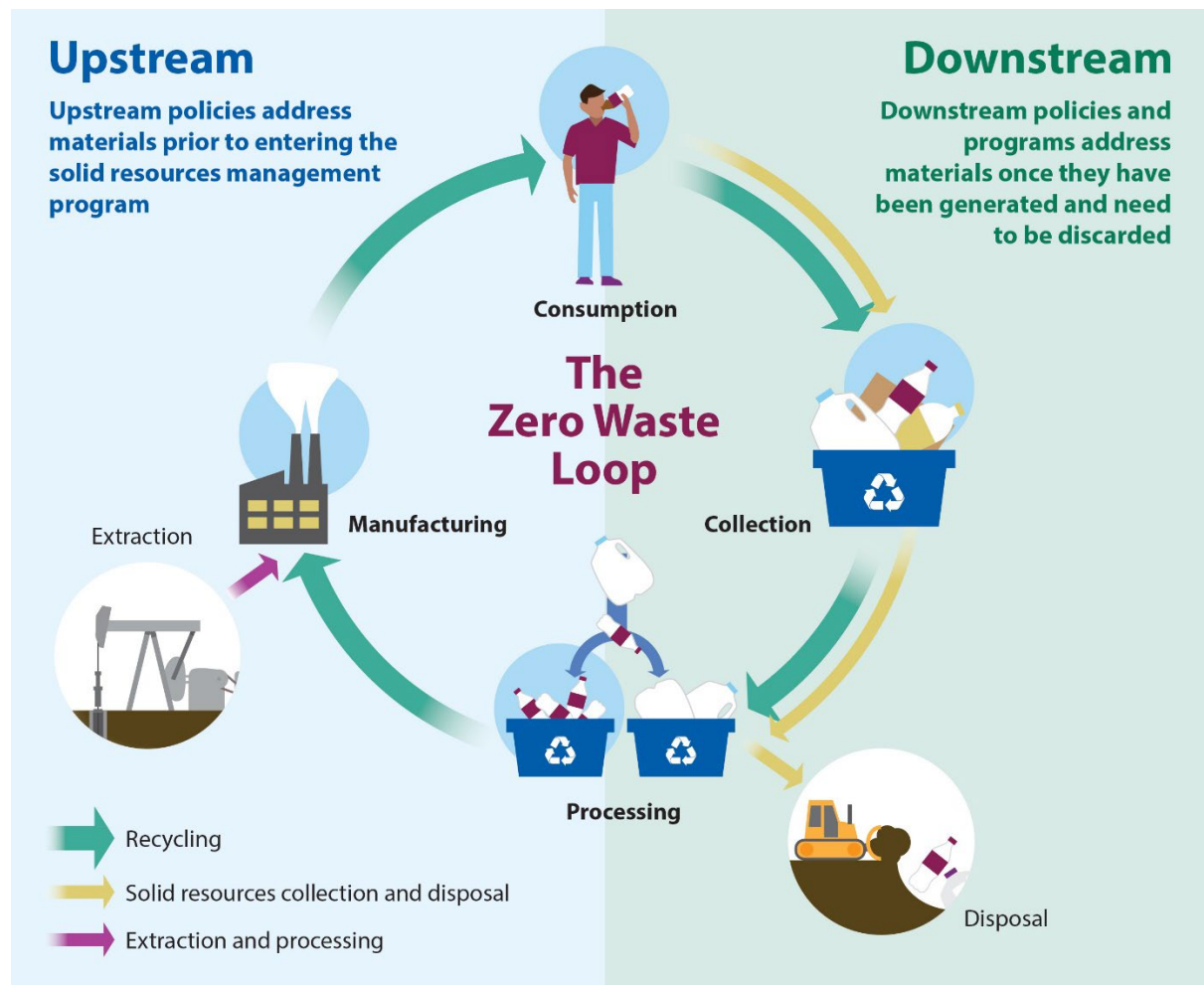


Figure ES-2. Zero Waste Loop

Program Overview

The City is proposing the Program to reduce the volume of single-use plastics and related items in the City’s waste stream and reduce environmental and human health impacts of single-use plastics. The Program would include City actions and policies that can be defined as upstream measures to reduce or eliminate the use of single-use plastics and products in the City’s waste stream and downstream measures to expand the City’s ability to manage reuse, recycling, and composting of alternative materials in order to support reusable products. Figure ES-3 illustrates the different categories and the individual Program elements within each category.



Figure ES-3. Overview of Comprehensive Plastics Reduction Program Measures

Upstream Measures

The City may implement various measures to reduce or eliminate the use of single-use products within the City. These measures fall into the following categories shown in Table ES-1 and are described in detail herein.

Table ES-1. Overview of Upstream Measures

Upstream Measure Policy Category	Associated Elements
Plastic Bottles	<ul style="list-style-type: none"> Single-use plastic water bottles Refillable plastic bottles Refillable beverage bottles Leashed lids on single-use plastic bottles Single-use plastic beverage holder rings
Foodware	<ul style="list-style-type: none"> Dine-in services Single-use to-go foodware Meal kit reuse and recycling Plastic tea bags Coffee/beverage pods Bioplastics ban City reusable foodware pilot projects
Textiles	<ul style="list-style-type: none"> Textile disposal policies Washing machine microfiber filtration
PFAS	--
Additional Products	<ul style="list-style-type: none"> Plastic bag clips Aerosol string Plastic sandbags Lighter-than-air balloons Single-use e-cigarettes Single-use printer cartridges
Working Group and Additional Studies	<ul style="list-style-type: none"> Zero waste in food or beverage facilities Extended producer responsibility program support
Outreach and Education	--

Downstream Measures

As the City implements the various upstream measures to reduce the production and use of single-use products within the City, it is anticipated that use of alternative reusable, compostable, and recyclable materials to plastics would increase throughout the City. Therefore, while the City anticipates a decrease in single-use materials entering the City’s waste stream and requiring disposal in landfills, it also anticipates that it would need to increase its capacity to handle compostable and recyclable replacement materials. The City may also seek to develop new facilities to handle trash/waste to avoid landfill disposal; expand or upgrade existing facilities to increase and/or improve processing capabilities;

and/or develop new facilities to enable the repair and reuse of materials (e.g., washing stations for reusable foodware, table linens). Therefore, the City may have the need to develop, expand, or upgrade the following new facilities and infrastructure:

- Facilities to handle recyclable materials (i.e., “blue bin facilities”);
- Facilities to handle compostable materials (i.e., “green bin facilities”);
- Facilities to handle trash/waste disposal (i.e., “black bin facilities”);
- Bottle refilling/hydration stations; and
- Foodware and linen washing facilities.

Environmental Review Process

As described in CEQA Guidelines Section 15168 (a) and (b), a program EIR is an EIR that may be prepared on a series of actions that can be characterized as one large project, and are related either:

- Geographically;
- As logical parts in the chain of contemplated actions;
- In connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program; or
- As individual activities carried out under the same authorizing statutory or regulatory authority, and having generally similar environmental effects which can be mitigated in similar ways.

As such, the City is preparing a Program Environmental Impact Report (PEIR) for its Comprehensive Plastics Reduction Program. This PEIR has been prepared in conformance with CEQA (Public Resources Code [PRC] Section 21000 et seq.) and the State CEQA Guidelines (Title 14, California Code of Regulations, Section 15000 et seq.).

Purpose and Use of the PEIR

The purpose of this document is to inform agency and governmental decision-makers and the public about the potential significant environmental effects associated with implementation of the range of activities that the City may conduct, implement, or oversee as part of the Program.

As described in CEQA Guidelines Section 15121(a), an EIR is a public information document that assesses potential environmental impacts of a proposed project and identifies mitigation measures and alternatives to the project that could reduce or avoid adverse environmental impacts. It is not the purpose of the PEIR to recommend either approval or denial of the proposed measures. Rather the PEIR serves to provide a full disclosure of potential environmental impacts of the Program for the City’s review and consideration.

Lead Agency

The lead agency is the public agency that has the greatest responsibility for carrying out or approving a project that may have a significant effect upon the environment (PRC Section 21067). The City of Los

Angeles, acting through the Bureau of Sanitation (LA Sanitation and Environment, LASAN), is the Lead Agency for this Program.

Summary of Environmental Impacts and Mitigation Measures

Upstream Measures

As described in the PEIR, implementation of the Program upstream elements would cause no impacts to agricultural and forestry resources, cultural resources, geology and soils, land use and planning, mineral resources, population and housing, public services, recreation, tribal cultural resources, and wildfire. Impacts to aesthetics, air quality, biological resources, energy, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, noise, transportation, and utilities and service systems would be beneficial or less than significant (Table ES-1).

Downstream Measures

Construction and operation of Program downstream elements would cause less than significant impacts to greenhouse gas emissions, energy, land use and planning, mineral resources, population and housing, public services, and recreation. Downstream measures would cause impacts that would be mitigated to less than significant levels to aesthetics, agriculture and forestry, air quality, geology and soils, hydrology and water quality, and utilities and service systems. Construction and operation of downstream elements has the potential to cause significant and unavoidable impacts to biological resources, cultural resources, hazards and hazardous materials, noise, transportation, tribal cultural resources, and wildfire (Table ES-2).

Alternatives to the Proposed Program

An important aspect of the environmental review process is the identification and analysis of alternatives to the Program that would avoid or minimize the significant impacts identified for the proposed Program, are feasible, and substantially meet the Program objectives. The CEQA Guidelines (Section 15126.6(a-f)) require an EIR to describe a reasonable range of feasible alternatives, including a No Project/Program Alternative, and to analyze the impacts of the alternatives to allow for a comparative analysis of impacts for consideration by decision-makers.

A screening-level analysis was conducted to identify a reasonable range of alternatives to analyze in comparison to the proposed Program in the PEIR. Based on the screening level analysis, two alternatives, in addition to the proposed Program, have been carried through for comparative evaluation in the PEIR: Alternative 1: No Program Alternative and Alternative 2: Extended Producer Responsibility (EPR) Alternative.

Comparison of Alternatives

Alternative 1: No Program Alternative

Under the No Program Alternative, the City would not implement any upstream measures proposed under the Program to reduce the distribution, offer, provision, and sale of single-use plastic products in

the City. The City also would not expand its capacity to recycle, compost, and reuse alternative materials via downstream measures. There would be continued compliance with state-level plastic reduction laws and regulations as well as continued enforcement of existing City ordinances banning or restricting certain types of single-use plastics.

The adverse effects of plastic pollution described in Section 1.3 (Project Objectives, Purpose, and Need) would continue in the City, including steadily increasing plastic waste going to landfills and plastic pollution degrading ecosystem health, human health, and the aesthetics of the City.

Alternative 2: Extended Producer Responsibility

EPR is generally described as a pollution prevention policy that focuses on products used by consumers, rather than mining/material extraction and manufacturing. EPR allows business as usual in terms of the materials used to produce products and focuses on ways to manage the material once it is discarded. This concept is based on the premise that the primary responsibility for waste generated during the production process (including extraction of raw materials) and after the product is discarded, is that of the producer of the product. The theory is that by making producers pay for the waste (wasted resources and post-consumer waste) and pollution they create, they will have an incentive to incorporate a broader range of environmental considerations into both their product design and choice of materials, thereby reducing consumption of resources at the various stages of the life cycle of a product or package. Cleaner production and waste prevention are the goals.

In the context of recycling plastics, EPR aims to shift the burden of managing plastic waste from local governments to the companies that produce and sell plastic products, and to the consumers who must take action for the program to work, and who often pay a fee to fund the program. This is particularly relevant due to the challenges posed by plastic pollution and the difficulty of effectively recycling plastic materials at municipal facilities.

The Extended Producer Responsibility Alternative would meet the Program objectives but to a lesser extent because the manufacture, sale, provision, and offer of single-use plastics that would be banned under the proposed Program would be allowed to continue under this alternative. Alternative 2 is effectively business as usual for the use of all types of plastic materials. Further, the success of the Extended Producer Responsibility Alternative in meeting the Program objectives would be dependent on effective consumer participation. Any lack of consumer participation would reduce the ability of this alternative to meet the Program objectives compared to the Program. However, the Extended Producer Responsibility Alternative would avoid the potential impacts of the Program that may occur due to the production and disposal (i.e., recycling and composting) of alternative materials to single-use plastics.

Environmentally Superior Alternative

The State CEQA Guidelines (Section 15126.6(d)) require that an EIR include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed Project. The CEQA Guidelines (Section 15126.6(e)(2)) further state, in part, that “If the environmentally superior alternative is the “No Project” alternative, the EIR would also identify an environmentally superior alternative among the other alternatives”. Based on the analysis provided in this PEIR, the City has determined that the Program is the environmentally superior alternative.

Organization of the PEIR

The following describes the organization of this PEIR:

- Section 1: Introduction. This section discusses the CEQA process, the purpose of the PEIR, and public involvement in the CEQA process.
- Section 2: Program Description. This section provides a detailed description of the Program, including rationale for the proposed measures included in the Program.
- Section 3: Environmental Setting, Impacts, and Mitigation Measures. This section describes the environmental setting and identifies potential impacts of the Program and alternatives for each of the CEQA Guidelines Appendix G environmental resource areas. If potentially significant adverse effects are identified, then measures to mitigate such impacts are presented.
- Section 4: Cumulative Impacts. This section analyzes the potential for the Program to have significant cumulative effects when combined with other past, present, and reasonably foreseeable future projects in each resource area’s cumulative geographic scope.
- Section 5: Alternatives. This section presents an overview of the alternatives development process and describes the alternatives to the Program that were considered.
- Section 6: Other CEQA Concerns. This section identifies areas of the PEIR where significant environmental effects cannot be avoided, if any. It also includes an analysis of growth inducement impacts that could occur due to the proposed Program.
- Section 7: References. This section provides a complete list of all references used to prepare the PEIR.
- Section 8: Report Preparers. This section identifies authors involved in preparing the PEIR, including any persons and organizations consulted during the CEQA process.

Table ES-2. Summary of Alternatives

Would the Program?	Program	Alternative 1 – No Program	Alternative 2 – EPR	Mitigation Measures
Aesthetics				
a) Have a substantial adverse effect on a scenic vista?	Upstream: Less than Significant	Upstream: Less than Significant ++	Upstream: Less than Significant +	None
	Downstream: Less than Significant with Mitigation	Downstream: No Impact	Downstream: Less than Significant with Mitigation	MM AES-1: Visual Impact Assessment
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	Upstream: Less than Significant	Upstream: Less than Significant ++	Upstream: Less than Significant +	None
	Downstream: No Impact	Downstream: No Impact	Downstream: No Impact	None
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	Upstream: Less than Significant	Upstream: Less than Significant ++	Upstream: Less than Significant +	None
	Downstream: Less than Significant with Mitigation	Downstream: No Impact	Downstream: Less than Significant with Mitigation	MM AES-1: Visual Impact Assessment
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	Upstream: No Impact	Upstream: No Impact	Upstream: No Impact	None
	Downstream: Less than Significant	Downstream: No Impact	Downstream: Less than Significant	MM AES-2: Lighting

Would the Program?	Program	Alternative 1 – No Program	Alternative 2 – EPR	Mitigation Measures
e) Create a new source of shading that would degrade the existing visual character or quality of the site and its surroundings?	Upstream: No Impact	Upstream: No Impact	Upstream: No Impact	None
	Downstream: Less than Significant with Mitigation	Downstream: No Impact	Downstream: Less than Significant with Mitigation	MM AES-1: Visual Impact Assessment MM AES-3. Shading Reduction
Agricultural Resources				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	Upstream: No Impact	Upstream: No Impact	Upstream: No Impact	None
	Downstream: Less than Significant with Mitigation	Downstream: No Impact	Downstream: Less than Significant with Mitigation	MM AG-1: Farmland replacement/ easement
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	Upstream: No Impact	Upstream: No Impact	Upstream: No Impact	None
	Downstream: Less than Significant	Downstream: No Impact	Downstream: Less than Significant	None
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	Upstream: No Impact	Upstream: No Impact	Upstream: No Impact	None
	Downstream: No Impact	Downstream: No Impact	Downstream: No Impact	None

Would the Program?	Program	Alternative 1 – No Program	Alternative 2 – EPR	Mitigation Measures
d) Result in the loss of forest land or conversion of forest land to non-forest use?	Upstream: No Impact	Upstream: No Impact	Upstream: No Impact	None
	Downstream: No Impact	Downstream: No Impact	Downstream: No Impact	None
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	Upstream: No Impact	Upstream: No Impact	Upstream: No Impact	None
	Downstream: No Impact	Downstream: No Impact	Downstream: No Impact	None
Air Quality				
a) Conflict with or obstruct implementation of the applicable air quality plan?	Upstream: Less than Significant	Upstream: No Impact	Upstream: Less than Significant	None
	Downstream: Less than Significant with Mitigation	Downstream: No Impact	Downstream: Less than Significant with Mitigation	MM AQ-1: Air Quality Impact Analysis and Emissions Reduction Measures
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	Upstream: Less than Significant	Upstream: No Impact	Upstream: Less than Significant	None
	Downstream: Less than Significant	Downstream: No Impact	Downstream: Less than Significant	None
c) Expose sensitive receptors to substantial pollutant concentrations?	Upstream: Less than Significant	Upstream: No Impact	Upstream: Less than Significant	None
	Downstream: Less than Significant with Mitigation	Downstream: No Impact	Downstream: Less than Significant with Mitigation	MM AQ-1: Air Quality Impact Analysis and Emissions Reduction Measures

Would the Program?	Program	Alternative 1 – No Program	Alternative 2 – EPR	Mitigation Measures
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	Upstream: Less than Significant	Upstream: No Impact	Upstream: Less than Significant	None
	Downstream: Less than Significant	Downstream: No Impact	Downstream: Less than Significant	None
Biological Resources				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	Upstream: Less than Significant	Upstream: Less than Significant ++	Upstream: Less than Significant +	None
	Downstream: Less than Significant with Mitigation	Downstream: No Impact	Downstream: Less than Significant with Mitigation	MM BIO-1: Biological Surveys MM BIO-3: Worker Environmental Awareness MM NOI-1: Noise and Vibration Study and Control Plan
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	Upstream: No Impact	Upstream: Less than Significant	Upstream: No Impact	None
	Downstream: Less than Significant with Mitigation	Downstream: No Impact	Downstream: Less than Significant with Mitigation	MM BIO-1: Biological Surveys MM BIO-2: Sensitive Community Mitigation MM BIO-3: Worker Environmental Awareness

Would the Program?	Program	Alternative 1 – No Program	Alternative 2 – EPR	Mitigation Measures
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	Upstream: No Impact	Upstream: Less than Significant	Upstream: No Impact	None
	Downstream: Less than Significant with Mitigation	Downstream: No Impact	Downstream: Less than Significant with Mitigation	MM BIO-2: Sensitive Community Mitigation MM BIO-3: Worker Environmental Awareness
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	Upstream: No Impact	Upstream: No Impact	Upstream: No Impact	None
	Downstream: No Impact	Downstream: No Impact	Downstream: No Impact	
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	Upstream: No Impact	Upstream: No Impact	Upstream: No Impact	None
	Downstream: No Impact	Downstream: No Impact	Downstream: No Impact	None
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	Upstream: No Impact	Upstream: No Impact	Upstream: No Impact	None
	Downstream: No Impact	Downstream: No Impact	Downstream: No Impact	None

Would the Program?	Program	Alternative 1 – No Program	Alternative 2 – EPR	Mitigation Measures
g) Would the Project Have a substantial impact, either directly or through habitat modifications, on common wildlife species?	Upstream: Less than Significant	Upstream: Less than Significant ++	Upstream: Less than Significant +	None
	Downstream: Significant and Unavoidable	Downstream: No Impact	Downstream: Significant and Unavoidable	MM BIO-3: Worker Environmental Awareness MM NOI-1: Noise and Vibration Study and Control Plan
Cultural Resources				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	Upstream: No Impact	Upstream: No Impact	Upstream: No Impact	None
	Downstream: Significant and Unavoidable	Downstream: No Impact	Downstream: Significant and Unavoidable	MM CUL-1: Pre-construction Cultural Surveys and Tribal Cultural Monitoring MM CUL-2: Unanticipated Discovery Procedures
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	Upstream: No Impact	Upstream: No Impact	Upstream: No Impact	None
	Downstream: Significant and Unavoidable	Downstream: No Impact	Downstream: Significant and Unavoidable	MM CUL-1: Pre-construction Cultural Surveys and Tribal Cultural Monitoring MM CUL-2: Unanticipated Discovery Procedures

Would the Program?	Program	Alternative 1 – No Program	Alternative 2 – EPR	Mitigation Measures
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	Upstream: No Impact	Upstream: No Impact	Upstream: No Impact	None
	Downstream: Less than Significant with Mitigation	Downstream: No Impact	Downstream: Less than Significant with Mitigation	MM CUL-1: Pre-construction Cultural Surveys and Tribal Cultural Monitoring MM CUL-3: Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects
Energy				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	Upstream: Less than Significant	Upstream: No Impact	Upstream: Less than Significant	None
	Downstream: Less than Significant	Downstream: No Impact	Downstream: Less than Significant	None
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	Upstream: Less than Significant	Upstream: No Impact	Upstream: Less than Significant	None
	Downstream: Less than Significant	Downstream: No Impact	Downstream: Less than Significant	None

Would the Program?	Program	Alternative 1 – No Program	Alternative 2 – EPR	Mitigation Measures
Geology and Soils				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42. ii) Strong seismic ground shaking? iii) Seismic-related ground failure, including liquefaction? iv) Landslides?	Upstream: No Impact	Upstream: No Impact	Upstream: No Impact	None
	Downstream: Less than Significant	Downstream: No Impact	Downstream: Less than Significant	None
b) Result in substantial soil erosion or the loss of topsoil?	Upstream: No Impact	Upstream: No Impact	Upstream: No Impact	None
	Downstream: Less than Significant	Downstream: No Impact	Downstream: Less than Significant	None
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	Upstream: No Impact	Upstream: No Impact	Upstream: No Impact	None
	Downstream: Less than Significant	Downstream: No Impact	Downstream: Less than Significant	None

Would the Program?	Program	Alternative 1 – No Program	Alternative 2 – EPR	Mitigation Measures
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	Upstream: No Impact	Upstream: No Impact	Upstream: No Impact	None
	Downstream: Less than Significant	Downstream: No Impact	Downstream: Less than Significant	None
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	Upstream: No Impact	Upstream: No Impact	Upstream: No Impact	None
	Downstream: Less than Significant	Downstream: No Impact	Downstream: Less than Significant	None
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	Upstream: No Impact	Upstream: No Impact	Upstream: No Impact	None
	Downstream: Less than Significant with Mitigation	Downstream: No Impact	Downstream: Less than Significant with Mitigation	MM GEO-1: Paleontological Resources Protection Measures
Greenhouse Gas Emissions				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	Upstream: Less than Significant	Upstream: No Impact	Upstream: Less than Significant	None
	Downstream: Less than Significant	Downstream: No Impact	Downstream: Less than Significant	None

Would the Program?	Program	Alternative 1 – No Program	Alternative 2 – EPR	Mitigation Measures
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	Upstream: Less than Significant	Upstream: No Impact	Upstream: Less than Significant	None
	Downstream: Less than Significant	Downstream: No Impact	Downstream: Less than Significant	None
Hazards and Hazardous Materials				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Upstream: Less than Significant	Upstream: Less than Significant ++	Upstream: Less than Significant +	None
	Downstream: Less than Significant with Mitigation	Downstream: No Impact	Downstream: Less than Significant with Mitigation	MM HAZ-1: Waste Management Plan MM HAZ-2: WEAP
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	Upstream: No Impact	Upstream: No Impact	Upstream: No Impact	None
	Downstream: Less than Significant with Mitigation	Downstream: No Impact	Downstream: Less than Significant with Mitigation	MM HAZ-1: Waste Management Plan MM HAZ-2: WEAP
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	Upstream: No Impact	Upstream: No Impact	Upstream: No Impact	None
	Downstream: Less than Significant with Mitigation	Downstream: No Impact	Downstream: Less than Significant with Mitigation	MM HAZ-1: Waste Management Plan MM HAZ-2: WEAP

Would the Program?	Program	Alternative 1 – No Program	Alternative 2 – EPR	Mitigation Measures
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	Upstream: No Impact	Upstream: No Impact	Upstream: No Impact	None
	Downstream: Less than Significant with Mitigation	Downstream: No Impact	Downstream: Less than Significant with Mitigation	MM HAZ-3: Phase I/II Environmental Site Assessment MM HAZ-4: Remediation Action Plan/Soil Management Plan
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	Upstream: No Impact	Upstream: No Impact	Upstream: No Impact	None
	Downstream: Less than Significant with Mitigation	Downstream: No Impact	Downstream: Less than Significant with Mitigation	MM HAZ-5: Airport Safety Hazard Assessment MM TR-1: Traffic Impact Report
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	Upstream: No Impact	Upstream: No Impact	Upstream: No Impact	None
	Downstream: Significant and Unavoidable	Downstream: No Impact	Downstream: Significant and Unavoidable	MM TR-1: Traffic Impact Analysis

Would the Program?	Program	Alternative 1 – No Program	Alternative 2 – EPR	Mitigation Measures
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	Upstream: No Impact	Upstream: No Impact	Upstream: No Impact	None
	Downstream: Significant and Unavoidable	Downstream: No Impact	Downstream: Significant and Unavoidable	MM TR-1: Traffic Impact Report MM HAZ-6: Emergency Access MM HAZ-7: Hillside Construction Staging and Parking Plan
Hydrology and Water Quality				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	Upstream: Less than Significant	Upstream: Less than Significant ++	Upstream: Less than Significant +	None
	Downstream: Less than Significant	Downstream: No Impact	Downstream: Less than Significant	None
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	Upstream: Less than Significant	Upstream: No Impact	Upstream: Less than Significant	None
	Downstream: Less than Significant with Mitigation	Downstream: No Impact	Downstream: Less than Significant with Mitigation	MM HWQ-1: Hydrology Study MM UTIL-3: Water Conserving Design MM UTIL-4: Water Supply Assessment

Would the Program?	Program	Alternative 1 – No Program	Alternative 2 – EPR	Mitigation Measures
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: (i) result in substantial erosion or siltation on- or off-site; (ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; (iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or (iv) impede or redirect flood flows?	Upstream: No Impact	Upstream: No Impact	Upstream: No Impact	None
	Downstream: Less than Significant	Downstream: No Impact	Downstream: Less than Significant	None
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	Upstream: No Impact	Upstream: No Impact	Upstream: No Impact	None
	Downstream: Less than Significant	Downstream: No Impact	Downstream: Less than Significant	None
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	Upstream: No Impact	Upstream: No Impact	Upstream: No Impact	None
	Downstream: Less than Significant	Downstream: No Impact	Downstream: Less than Significant	None
Land Use and Planning				
a) Physically divide an established community?	Upstream: No Impact	Upstream: No Impact	Upstream: No Impact	None
	Downstream: Less than Significant	Downstream: No Impact	Downstream: Less than Significant	None

Would the Program?	Program	Alternative 1 – No Program	Alternative 2 – EPR	Mitigation Measures
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	Upstream: No Impact	Upstream: Less than Significant	Upstream: No Impact	None
	Downstream: Less than Significant	Downstream: No Impact	Downstream: Less than Significant	None
Mineral Resources				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	Upstream: No Impact	Upstream: No Impact	Upstream: No Impact	None
	Downstream: Less than Significant	Downstream: No Impact	Downstream: Less than Significant	None
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	Upstream: No Impact	Upstream: No Impact	Upstream: No Impact	None
	Downstream: Less than Significant	Downstream: No Impact	Downstream: Less than Significant	None

Would the Program?	Program	Alternative 1 – No Program	Alternative 2 – EPR	Mitigation Measures
Noise				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	Upstream: Less than Significant	Upstream: No Impact	Upstream: Less than Significant	None
	Downstream: Significant and Unavoidable	Downstream: No Impact	Downstream: Significant and Unavoidable	MM NOI-1: Noise and Vibration Control Plan MM NOI-2: Construction Noise Authorization MM NOI-3: Construction Hours MM NOI-4: Sensitive Receptor Buffers MM NOI-5: Property Line Noise Levels
b) Generation of excessive groundborne vibration or groundborne noise levels?	Upstream: Less than Significant	Upstream: No Impact	Upstream: Less than Significant	None
	Downstream: Significant and Unavoidable	Downstream: No Impact	Downstream: Significant and Unavoidable	MM NOI-1: Noise and Vibration Control Plan
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	Upstream: No Impact	Upstream: No Impact	Upstream: No Impact	None
	Downstream: Significant and Unavoidable	Downstream: No Impact	Downstream: Significant and Unavoidable	MM NOI-6: Airport Impact Analysis

Would the Program?	Program	Alternative 1 – No Program	Alternative 2 – EPR	Mitigation Measures
Population and Housing				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	Upstream: No Impact	Upstream: No Impact	Upstream: No Impact	None
	Downstream: No Impact	Downstream: No Impact	Downstream: No Impact	None
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	Upstream: No Impact	Upstream: No Impact	Upstream: No Impact	None
	Downstream: No Impact	Downstream: No Impact	Downstream: No Impact	None
Public Services				
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: Fire protection? Police protection? Schools? Parks? Other public facilities?	Upstream: No Impact	Upstream: No Impact	Upstream: No Impact	None
	Downstream: Less than Significant	Downstream: No Impact	Downstream: Less than Significant	None
Recreation				
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	Upstream: No Impact	Upstream: No Impact	Upstream: No Impact	None
	Downstream: No Impact	Downstream: No Impact	Downstream: No Impact	None

Would the Program?	Program	Alternative 1 – No Program	Alternative 2 – EPR	Mitigation Measures
b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	Upstream: No Impact	Upstream: No Impact	Upstream: No Impact	None
	Downstream: No Impact	Downstream: No Impact	Downstream: No Impact	None
Transportation				
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	Upstream: Less than Significant	Upstream: No Impact	Upstream: Less than Significant	None
	Downstream: Significant and Unavoidable	Downstream: No Impact	Downstream: Significant and Unavoidable	MM TR-1: Traffic Impact Report
b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	Upstream: Less than Significant	Upstream: No Impact	Upstream: Less than Significant	None
	Downstream: Significant and Unavoidable	Downstream: No Impact	Downstream: Significant and Unavoidable	MM TR-1: Traffic Impact Report
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	Upstream: No Impact	Upstream: No Impact	Upstream: No Impact	None
	Downstream: Significant and Unavoidable	Downstream: No Impact	Downstream: Significant and Unavoidable	MM TR-1: Traffic Impact Report
d) Result in inadequate emergency access?	Upstream: No Impact	Upstream: No Impact	Upstream: No Impact	None
	Downstream: Significant and Unavoidable	Downstream: No Impact	Downstream: Significant and Unavoidable	MM TR-1: Traffic Impact Report

Would the Program?	Program	Alternative 1 – No Program	Alternative 2 – EPR	Mitigation Measures
Tribal Cultural Resources				
a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:	Upstream: No Impact	Upstream: No Impact	Upstream: No Impact	None
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	Downstream: Significant and Unavoidable	Downstream: No Impact	Downstream: Significant and Unavoidable	MM CUL-1: Pre-construction Cultural Survey and Tribal Cultural Monitoring MM CUL-2: Unanticipated Discoveries Procedures MM CUL-3: Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects

Would the Program?	Program	Alternative 1 – No Program	Alternative 2 – EPR	Mitigation Measures
Utilities and Services Systems				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	Upstream: No Impact	Upstream: No Impact	Upstream: No Impact	None
	Downstream: Less than Significant with Mitigation	Downstream: No Impact	Downstream: Less than Significant with Mitigation	MM UTIL-1: Underground Utilities Search MM UTIL-3: Water Conserving Designs MM UTIL-4: Water Supply Assessment MM UTIL-5: Wastewater Services Information (WWSI) Request MM UTIL-6: Energy Efficient Design
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	Upstream: Less than Significant	Upstream: No Impact	Upstream: Less than Significant	None
	Downstream: Less than Significant with Mitigation	Downstream: No impact	Downstream: Less than Significant with Mitigation	MM UTIL-3: Water Conserving Designs MM UTIL-4: Water Supply Assessment

Would the Program?	Program	Alternative 1 – No Program	Alternative 2 – EPR	Mitigation Measures
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments?	Upstream: Less than Significant	Upstream: No Impact	Upstream: Less than Significant	None
	Downstream: Less than Significant with Mitigation	Downstream: No impact	Downstream: Less than Significant with Mitigation	MM UTIL-5: Wastewater Services Information (WWSI) Request.
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	Upstream: Less than Significant	Upstream: Less than Significant ++	Upstream: Less than Significant +	None
	Downstream: Less than Significant with Mitigation	Downstream: No impact	Downstream: Same as Program	MM UTIL-2: Construction Waste Reduction MM UTIL-3: Water Conserving Designs
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	Upstream: Less than Significant	Upstream: Less than Significant ++	Upstream: Less than Significant +	None
	Downstream: Less than Significant	Downstream: No Impact	Downstream: Less than Significant	None

Would the Program?	Program	Alternative 1 – No Program	Alternative 2 – EPR	Mitigation Measures
Wildfire				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	Upstream: No Impact	Upstream: No Impact	Upstream: No Impact	None.
	Downstream: Significant and Unavoidable	Downstream: No Impact	Downstream: Significant and Unavoidable	MM TR-1: Traffic Impact Report MM HAZ-6: Emergency Access MM HAZ-7: Hillside Construction Staging and Parking Plan
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	Upstream: No Impact	Upstream: No Impact	Upstream: No Impact	None.
	Downstream: Significant and Unavoidable	Downstream: No impact	Downstream: Significant and Unavoidable	MM HAZ-6: Emergency Access MM HAZ-7: Hillside Construction Staging and Parking Plan
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	Upstream: No Impact	Upstream: No Impact	Upstream: No Impact	None
	Downstream: Significant and Unavoidable	Downstream: No impact	Downstream: Significant and Unavoidable	MM HAZ-6: Emergency Access MM HAZ-7: Hillside Construction Staging and Parking Plan

Would the Program?	Program	Alternative 1 – No Program	Alternative 2 – EPR	Mitigation Measures
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	Upstream: No Impact	Upstream: No Impact	Upstream: No Impact	None
	Downstream: Significant and Unavoidable	Downstream: No impact	Downstream: Significant and Unavoidable	MM HAZ-6: Emergency Access MM HAZ-7: Hillside Construction Staging and Parking Plan

Notes: + = greater adverse effect as compared to those of the Program; ++ = greatest adverse effect as compared to those of the Program