SECTION 5 Alternatives

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.

Specifically, CEQA requires consideration of a range of alternatives to the Project or Program that: (1) could feasibly attain most of the basic Program objectives and (2) would avoid or substantially lessen any of the significant impacts of the proposed Program. An alternative cannot be eliminated simply because it is costlier than the proposed Program or if it could impede the attainment of all Program objectives to some degree. However, the CEQA Guidelines state that an EIR need not consider an alternative whose effects cannot be reasonably ascertained and whose implementation is remote or speculative. CEQA requires that an EIR include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed Program.

The following sections discuss the alternatives screening methodology, the screening results, and the alternatives that have been eliminated from consideration.

5.1 Alternatives Development Process

In addition to the No Program Alternative, the City has identified a reasonable range of alternatives to analyze in comparison to the Program in the PEIR, based on the following steps:

- Step 1: Defining the alternatives to allow comparative evaluation.
- Step 2: Evaluating each alternative in consideration of the following criteria:
    - the extent to which the alternative would accomplish most of the basic goals and objectives of the Program;
    - the extent to which the alternative would avoid or lessen one or more of the identified significant environmental effects of the Program;
    - the potential feasibility of the alternative, in consideration of site suitability, economic viability, availability of infrastructure, and consistency with other applicable plans and regulatory limitations; and
    - the appropriateness of the alternative in contributing to a “reasonable range” of alternatives necessary to permit a reasoned choice.

Step 3: Determining the suitability of the proposed alternative for full analysis in the PEIR. If the alternative was unsuitable, then it was eliminated from further consideration, with appropriate justification. In the final phase of the screening analysis, the City carefully weighed the environmental advantages and disadvantages of the remaining alternatives with respect to the potential for overall environmental advantage, technical feasibility, and consistency with Program objectives.

The following subsections present the results of this process.

5.1.1 Step 1: Alternatives Considered

Throughout the PEIR the upstream and downstream elements are identified and analyzed separately, which is continued in the development of alternatives. The direct impacts of upstream program elements are driven by the removal or reduction of the program component, while indirect effects are driven by the market and user's response to the removal through adoption of alternate materials, replacement behavior, or new practices.

The upstream elements are a blueprint for future development of ordinances and programs. If additional elements are identified through the study and engagement process described in the Program description, then these can be added to the Program (although these would not likely be addressed by the PEIR environmental analysis). Similarly, the Los Angeles City Council may decline to move forward to request that ordinances be developed for individual upstream Program elements. Several items were identified during scoping for inclusion of additional upstream Program elements. These were not considered as alternatives, because under the Program future study and engagement process these may be considered in the future. If they are considered in the future, any discretionary action by the City would be subject to a separate environmental review under CEQA. These elements are:

- Receipts only printed on request.
- Prohibit the sale and distribution of products packaged the following materials: Polyvinyl chloride; Polyvinylidene chloride; Oxo-degradable additives, including oxo-biodegradable additives; non-detectable pigments (e.g. carbon black); pigments (other than transparent blue or green) added to polyethylene terephthalate bottles; polyethylene terephthalate glycol.
- Replace plastic packaging with cardboard/paper packaging.
- Recycling of film set walls and set pieces.
- Reduce use of packaging that is not recyclable or compostable.
- Eliminate reusable plastic bags.
- Work with the state on the implementation of SB 54.

No significant impacts were identified for upstream Program elements. Alternatives to the upstream elements of the Comprehensive Plastics Reduction Program are therefore developed at the program level. The upstream Program consists of bans, restrictions on use, EPR programs, and education and outreach to affected businesses, agencies, and the public.

One alternative that would reduce the effects of the Program would be one that does not include bans, but instead replaces them with EPR programs. This could be considered a "reduced project" alternative, although it is more of a change in focus away from any bans. This alternative is similar in principle to the state SB 54 (Plastic Pollution Prevention and Packaging Producer Responsibility Act), which also takes an EPR approach. However, this alternative would follow the City's program approach to target specific products and end uses, rather than the state approach of addressing plastic material type and form through recycling. For example, the consideration of banning plastic bag clips stems from the inability of City material recovery facilities to separate items less than 3 inches in diameter. The SB 54 implementing regulations find that plastic bag clips are recyclable, and addresses them according to recycling by plastic resin type. However, because they cannot be separated in the City, they never enter a recycling stream

in the first place. Therefore, in considering an EPR alternative for plastic bag clips, the focus is on product specific end use, and requires a take-back program specific to plastic bag clips.

A second alternative would be to further reduce the Program to voluntary reduction in the use of plastics and other Program elements. This alternative is similar in principle to the Federal National Strategy to Prevent Plastic Pollution (USEPA 2023), which also focuses on voluntary plastic reduction measures, rather than bans or EPR.

Downstream program elements include the potential for construction of new facilities. The ground-disturbing activity and physical changes to the environment for operation and construction of new or modified facilities drive the direct impacts of these elements of the Program. Because neither the location of the facilities nor their actual size and capacity is known at this time, the initial PEIR analysis resulted in the potential for significant impacts to some environmental resources under some specific circumstances of location or capacity. These impacts are driven by the lack of constraint on location or capacity of facilities at this Programmatic level of certainty. An alternative that would reduce or eliminate the significant impacts of the project would be to identify the specific drivers of the significant impact, and use these to constrain the location or capacity of potential new downstream facilities. That is, the facilities could still be developed, but under this alternative, certain locations with significant impacts would not be pursued, or certain size thresholds would not be exceeded.

Four alternatives, in addition to the Program, were identified in this step and are subject to screening level analysis in the next Section:

- Alternative 1: No Program Alternative
- Alternative 2: EPR
- Alternative 3: Voluntary Reduction
- Alternative 4: Reduce Significant Impacts of Downstream Facilities.

5.1.2 Step 2: Screening Level Evaluation of Alternatives

Each alternative is analyzed at a screening level in this step, to determine the alternatives that will be carried forward for full analysis in the PEIR.

5.1.2.1 Alternative 1: No Program Alternative

The purpose of the No Project or Program Alternative is “to allow decisionmakers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project” (CEQA Guidelines Section 15126.6(e)). State CEQA Guidelines Section 15126.6(e)(2) requires that the no project alternative analysis “discuss the existing conditions…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 policies and consistent with the available infrastructure and community services.” Existing conditions are defined as those at the time the NOP was published.

Under the No Program Alternative, the City would not implement any upstream measures 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.

It is reasonably foreseeable, based on population growth and increasing trends in single-use plastics production, use, and improper disposal, that without the proposed Program, the adverse effects of plastic pollution described in Section 1.3 (Program 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. In considering the effects of the No Program Alternative, these increasing levels of environmental degradation are taken into account.

5.1.2.2 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. That is, compared to a ban which is an upstream measure that removes the product or material from the system entirely, EPR is fundamentally a downstream measure that seeks to reduce the impacts of products and materials that continue to be used and released in the system.

This EPR 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 practice, EPR has been implemented for certain products as discussed below at the state level and the responsibility for participation, and in some cases the cost, is borne by the consumer. Depending on how EPR is implemented, it can more accurately be viewed as Enhanced Consumer Responsibility (CRI 1997). For an EPR program to be successful, it is the consumer that must participate by bringing their used materials to a producer, local, or state facility. For most EPR programs, the funding comes from the consumer in the form of regulatory-required increases in the cost of goods to fund the EPR program directly or in the form of deposits with uncollected deposits to fund the EPR program indirectly.

There are five basic types of producer responsibility:

- Liability – the producer is responsible for environmental damage caused by the product in question.
- Economic responsibility – the producer covers all or part of the costs for collection, recycling, or final disposal of products and may charge a special fee to the consumer to offset or remove the need for producer payment.
- Physical responsibility – the producer is involved in physical management of the products or the effect of the products. This can range from merely developing the necessary technology to managing the total “take-back” system for collecting or disposing of products the manufacturer has manufactured for which they may charge a fee.
- Ownership – the producer assumes both physical and economic responsibility.

- Informative responsibility – the producer is responsible for providing information on the product or its effects at various stages of its life cycle, but it is up to the consumer to both act and pay for methods to extend its life cycle or reduce its effects.

Take-back programs generally combine both economic (i.e., fees to both the producer and the consumer) and physical (i.e., producer provides the system, consumer is responsible for taking actions) responsibility for both the consumer and the producer. Take-back programs are also specific to products and producers.

SB 54 applies a different approach to EPR: producers have liability for environmental damage, ownership of physical and economic responsibility, and responsibility for providing information on the product or its effects at various stages of its life cycle. Implementation is through grouping producers into a Producer Responsibility Organization based in part on the amount and type of single-use plastic. Funding is assessed, and expenditures overseen by an expanded CalRecycle and Division of Circular Economy.

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.

Several comments received during public scoping for this PEIR recommended that the City consider an EPR approach to plastics reduction because the state has applied an EPR approach to the reduction of plastic and other packaging through SB 54. The state, through CalRecycle, currently oversees several statewide EPR programs, including:

- Paint Stewardship Program (AB 1343, 2010);
- Carpet Stewardship Program (AB 2398, 2011);
- Mattress Stewardship Program (SB 254, 2013);
- Pharmaceutical and Sharps Waste Stewardship Program (SB 212, 2018);
- Plastic Pollution and Packaging Producer Responsibility Program (SB 54, 2022); and
- Responsible Battery Recycling Program (AB 2440, 2022).

The implementation of these programs varies in their implementation measures and are specific to the relevant legislation within each product area. Of these programs, the paint, mattress, and carpet stewardship programs are funded by fees on the product purchaser (i.e., the consumer). The pharmaceutical and sharps waste stewardship program is funded by producers. Programs for plastic pollution and packaging and battery recycling were recently passed by the legislature in 2022 and have not yet been implemented.

The Program as proposed would apply an EPR approach to reducing waste associated with textiles, coffee/beverage pods, and meal kits, after the City considered application of a ban or restriction on these items and determined that it would be infeasible at this time. These Program elements are different from, but complementary to, SB 54 because they target specific products and end uses. This EPR alternative would only apply to those Program elements for which a ban or restriction is currently

proposed. For each of these Program elements, this alternative would replace the ban or restriction with an EPR program that, unlike SB 54, targets specific products and end uses. The alternative would continue the nature of the City Program in being different from, but complimentary to, SB 54. The Program elements that consist of bans are shown below along with the nature of an EPR program in Table 5.1-1. Those elements that would be affected by this alternative are indicated in **bold** text and include single-use plastic water bottles, single-use plastic beverage holder rings, plastic bag clips, and single-use e-cigarettes and vape cartridges. This alternative would still ban the Program elements for which there is no feasible way to implement an EPR program (i.e., plastic tea bags, bioplastics, PFAS, aerosol string, plastic sandbags, and lighter-than-air balloons). Additionally, Program elements that do not ban products, such as a requirement that 25% of all plastic bottles and jugs be refillable or leashed lids on plastic bottles, would still be retained under this alternative.

Table 5.1-1. Comparison of Program Measures vs. EPR Alternative

Program Element Ban	Alternative 2: EPR Element
Single-Use Plastic Water Bottles	**Plastic bottle distributors to fund or implement a take back program, similar to the recommendations of the Legislative Analyst's Office[36] in addressing the funding gap of the existing CalRecycle Beverage Container Recycling Program. SB 54 exempts single-use plastic water bottles because they are currently covered by the Beverage Container Recycling Program.**
Single-Use Plastic Beverage Holder Rings	**Distributors of plastic beverage holder rings to fund or implement a take-back program focused on this product**
Plastic Tea Bags	No feasible EPR program owing to characteristics of used tea bags
Bioplastics	No feasible EPR program owing to the variety of products and difficulty of discerning difference from petroleum-based plastics
PFAS	No feasible EPR program owing to characteristics and uses of PFAS
Plastic Bag Clips	**Manufacturers of plastic bag clips fund or implement a take-back program focused on this product**
Aerosol String	No feasible EPR program owing to characteristics of aerosol strings
Plastic Sandbags	No feasible EPR program owing to characteristics and use of sandbags
Lighter-Than-Air Balloons	No feasible EPR program owing to characteristics of lighter-than-air balloons
Single-use E-cigarettes and Vape Cartridges	**Manufacturers or distributors of single use e-cigarettes and vape cartridges fund or implement a take-back program for these products**

[36] An Analysis of the Beverage Container Recycling Program (2015). California Legislative Analyst's Office: "LAO Recommendations Shift Processing Costs to Manufacturers. First, we recommend shifting processing costs to manufacturers. This would reduce BCRF expenditures significantly, probably eliminating the structural deficit. It would also require producers to cover the recycling costs of their products, which means that these costs are incorporated or "internalized" into the total cost of the product when it is sold. Therefore, the price that consumers pay reflects the entire cost of the product—its production and disposal. Shifting costs to manufacturers could be done in two ways, either by eliminating processing fee offsets or by moving to a market-based system where manufacturers are responsible for the recycling of materials. While either approach could work, we find that the market-based approach has several potential advantages."

The Program seeks to eliminate or substantially reduce single-use plastics with the objective of ultimately removing these single-use plastics from the environment through upstream measures. The EPR alternative would instead allow all of these materials into the environment (no bans) but would instead focus efforts on reusing or recycling these items rather than landfilling them. Thus, this alternative, like SB 54, is fundamentally a downstream approach. Manufacturers could continue to produce, and retailers would continue to sell these materials to consumers, and the EPR program would focus the efforts on diverting these materials from landfills. The success of EPR programs is dependent on consumer behavior: consumers need to properly sort, manage, and return items to the proper location at the proper time. The success of the EPR Alternative would also rely on either the consumer or the producer to fund the programs to reuse or recycle the materials.

Because the EPR approach allows these Program elements to continue being manufactured, distributed, and sold, this alternative would result in a greater amount of plastic pollution in the environment compared to the bans proposed by the Program. As such, the alternative would also have greater adverse effects to ecosystem health, human health, and aesthetics of the City compared to the Program. It would divert less plastic waste from landfills.

However, it is anticipated that the EPR Alternative could still meet in part the following Program objectives:

- 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.
- Reduce aesthetic degradation of the City due to plastic litter.

This alternative is anticipated to reduce some impacts of the Program related to the use of alternative materials because fewer or no alternative materials would be required. The level of reduction of impacts and use is expected to be less than for the Program, however, because of the continued use of the plastic materials and the dependence on consumer participation for EPR program success. However, because it has the potential to avoid some potentially adverse effects of the Program, this alternative is retained for comparative analysis in this PEIR.

5.1.2.3 Alternative 3: Voluntary Reduction

Under a Voluntary Reduction Alternative, the City would not implement new policies that constitute a ban on the manufacture, offer, sale, or provision of specific single-use plastics, nor would the City implement policies that require a form of EPR be implemented. Instead, the City would implement policies that would allow producers, businesses, and consumers to avoid the use of single-use plastics through voluntary measures. This alternative is similar in principle to the Federal National Strategy to Prevent Plastic Pollution (USEPA 2023), which also focuses on voluntary plastic reduction measures, rather than bans or EPR.

The City currently has two voluntary reduction ordinances in place: the 2021 Disposable Foodware Accessories-on-Request Ordinance (Ordinance 187030)[37] and 2019 Plastic Straws-on-Request Ordinance (Ordinance 186028)[38].

The success of a voluntary reduction program is ultimately dependent on behavioral changes of businesses and consumers and would likely be influenced by factors, including but not limited to, the following:

- awareness of voluntary reduction measure(s);
- knowledge/awareness of the benefits of avoiding single-use plastics or single-use products in general;
- cost of substitute products;
- knowledge of substitute products; and
- availability/ease of obtaining substitute products.

Extensive outreach and education to businesses and the public to inform them of the factors listed above would be needed to increase the likelihood of voluntary reduction. The Voluntary Reduction Alternative would seek to raise awareness of the need to reduce single-use plastic use and pollution; provide a focus for the voluntary actions that can be taken to respond to this need; and encourage the availability of the alternate materials or actions that need to be taken. Overall, the draft National Strategy to Prevent Plastic Pollution (USEPA 2023) has recommended primarily Voluntary Reduction, augmented by exploration of the applicability of EPR and inclusion of active reduction in plastics in federal procurement.

While voluntary reduction in the use of plastics can be a part of a more comprehensive strategy to address plastic pollution and environmental sustainability, its effectiveness is limited without the support of regulatory measures and broader systematic changes. Some key obstacles to achieving the Program objectives are:

- Limited Impact: Without regulatory or financial incentives, voluntary efforts might not lead to significant reductions in plastic use, especially when there are economic and convenience factors favoring plastic materials.
- Inequity: Voluntary actions may not ensure consistent reductions across industries or products. Some companies or sectors might not participate, leading to disparities in plastic reduction efforts.
- Behavioral Change: Encouraging consumers to voluntarily change their behavior can be challenging, as convenience and habits often play a significant role in product choices.

[37] More information about the Disposable Foodware Accessories-on-Request Ordinance, including full ordinance text, can be found at: https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r/s-lsh-wwd-s-r-fwa?_adf.ctrl-state=8ndmsgavf_5&_afrLoop=12665017259225703#!

[38] More information about the Straws-on-Request Ordinance, including full ordinance text, can be found at: https://www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-s-r-psro?_adf.ctrl-state=8ndmsgavf_5&_afrLoop=12664895721428414#!

- Market Dynamics: In a competitive market, companies might be hesitant to reduce plastic usage voluntarily if it is perceived that customers still prefer plastic-based products.
- Lack of Accountability: Without clear regulations, there might be no mechanism to hold companies accountable if they fail to meet their voluntary commitments.

While voluntary reduction efforts can contribute to raising awareness and fostering innovation, they are often most effective when combined with regulatory measures and systematic changes that create a conducive environment for reducing plastic use and addressing plastic pollution on a larger scale.

Because the Voluntary Reduction Alternative would not prohibit single-use plastics from being manufactured, distributed, and sold in the City, it would result in more single-use plastic items in circulation throughout the City compared to the Program. This in turn would result in a greater amount of plastic pollution in the environment and waste in the City's waste stream and would also have greater adverse effects to ecosystem health, human health, and aesthetics of the City compared to the Program. The effectiveness of the Voluntary Reduction Alternative would be dependent upon business and consumer behavior. The City anticipates that this Alternative would reduce a certain amount of plastic use within the City. However, because there would be no regulatory requirement to reduce plastic use or EPR program in place, the volume of single-use plastics reduced within the City is speculative but would likely be much less than under the Program.

The Voluntary Reduction Alternative would not meet the following Program objectives:

- 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.
- 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.

As such, this alternative is not analyzed further in this PEIR.

5.1.2.4 Alternative 4: Reduce Significant Impacts of Downstream Facilities

The ground-disturbing activity and physical changes to the environment from the construction and operation of new or modified downstream facilities drive the direct impacts of the Program's downstream elements. However, although this PEIR could analyze the impact driver, the locations of the facilities are not known. As such, some locations could have receptors or setting characteristics that lead to the potential for significant and unavoidable impacts of the downstream elements of the Program.

Under this alternative, the Program impact analysis of downstream facilities is used to identify the characteristics of the environmental setting that lead to significant impacts. Where feasible, this alternative then uses these characteristics as constraints to location or capacity of downstream facilities. Therefore, this alternative consists of a series of constraints that would apply to potential future downstream facilities that would reduce or eliminate the significant impacts.

Each of the resource categories for which the downstream elements of the Program had the potential for a significant and unmitigable impact in the initial resources analyses were considered as part of this alternative and evaluated for the possibility to reduce impacts further than originally identified. Additional mitigation measures constraining the locations and/or design of potential future downstream measures were identified. The City determined these additional mitigation measures to be potentially feasible, in consideration of site suitability, economic viability, availability of infrastructure, and consistency with other applicable plans and regulatory limitations. Therefore, additional siting constraints evaluated as part of Alternative 4 have been incorporated into mitigation measures of the Proposed Program, and Alternative 4 is not evaluated as an independent alternative in this PEIR.

5.1.3 Step 3: Alternatives Carried Forward for Full Evaluation

The 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 Program. The Lead Agency is required to evaluate and compare the environmental impacts of alternatives to the proposed Program, though not at the same level of detail as the proposed Program. Based on the screening level analysis described above, two alternatives, in addition to the proposed Program, have been carried through for comparative evaluation in the PEIR:

- Alternative 1: No Program Alternative
- Alternative 2: EPR Alternative

Each of the alternatives is potentially feasible, in consideration of site suitability, economic viability, availability of infrastructure, and consistency with other applicable plans and regulatory limitations. Finally, the Program and these two alternatives provide a "reasonable range" of alternatives necessary to permit a reasoned choice.

5.2 Comparative Impact Analysis of Alternatives

Figure 5.2-1 provides a graphical representation of the differences between the Program and alternatives. A comparative summary of the potential impacts under each alternative is provided in Table 5.2-1. The following subsections provide a comparative analysis of the impacts in narrative form to complement Table 5.2-1.

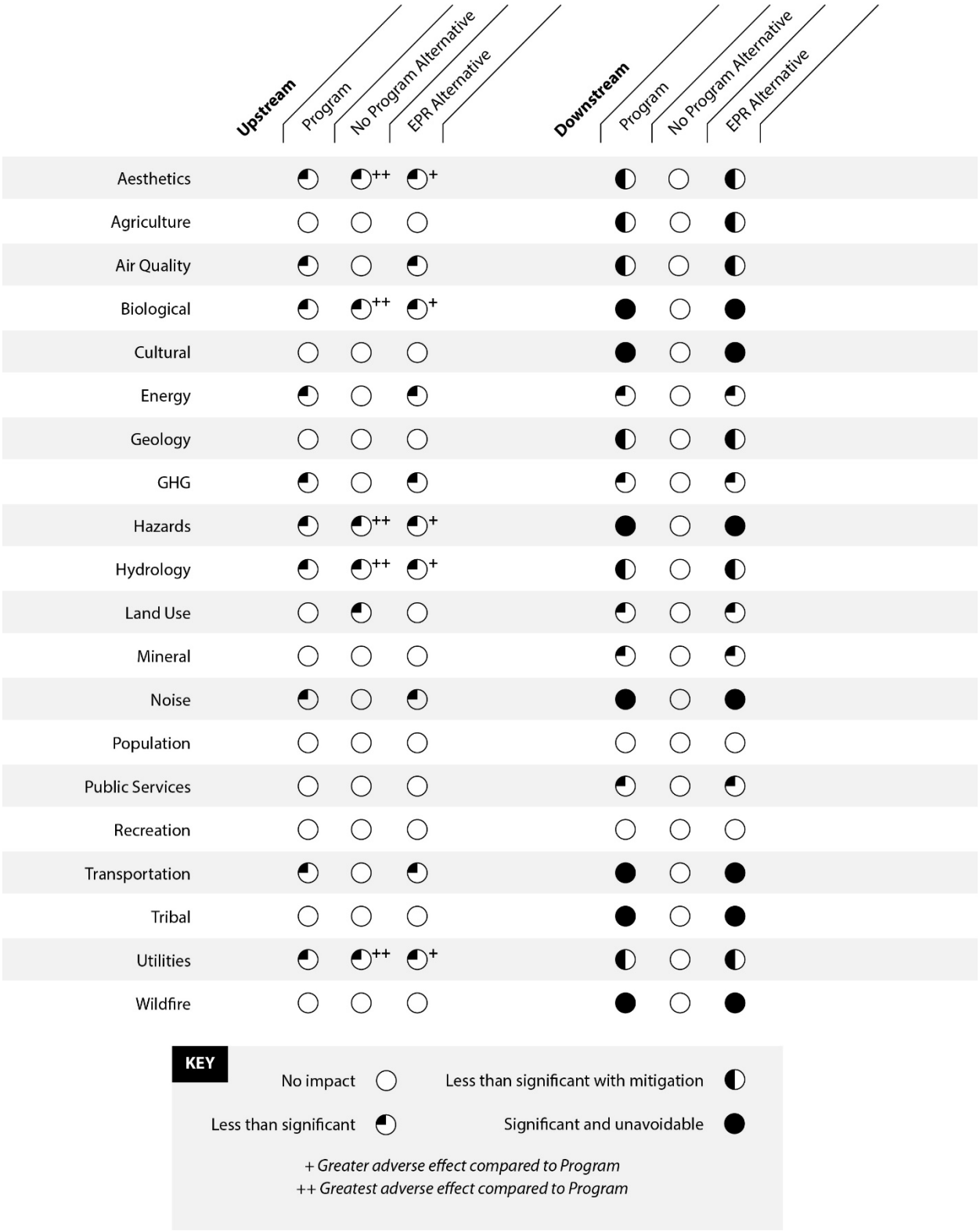

Figure 5.2-1. Alternatives Impact Comparison

5.2.1 Alternative 1: No Program

Under the No Program Alternative, the adverse effects of plastics pollution described in Section 1.3 (Program 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. These adverse effects would continue into the future and could be reasonably foreseen to increase in the severity of adverse effects. Under the No Program alternative, it is anticipated that single-use plastics would continue to have the following adverse environmental impacts:

- Being the primary source of land litter in California;
- Infiltrating City drainages and accrue in landfills;
- Being channeled to the Pacific Ocean via urban runoff;
- Contributing to loss of tourism and recreational/aesthetic values;
- Posing a human health threat; and
- Not being routinely recycled (UCLA Luskin School of Public Affairs 2020).

The No Program Alternative and proposed Program upstream measures would have no impact on the following environmental resource areas and therefore, they are not analyzed further in this section:

- Agriculture and Forestry
- Cultural Resources
- Geology and Soils
- Mineral Resources
- Population and Housing
- Public Services
- Recreation
- Tribal Cultural Resources
- Wildfire

No downstream impacts of the Program would occur under the No Program alternative. All of the significant and unavoidable impacts of the downstream elements of the proposed Program would not occur in the No Program alternative. Therefore, a resource-specific analysis of downstream impacts is not provided below. Due to a continued increase in single-use plastic materials, it is reasonably foreseeable that an increase in the number of City-contracted solid resources facilities would need to increase. However, the types of facilities would be different from those considered in the downstream Program elements because these focus on recycling and reuse. It is speculative at this point to specify with any certainty the relative amounts and impacts of different types of downstream facilities that would be needed in the future to handle additional waste.

5.2.1.1 Aesthetics

Under the No Program Alternative, the single-use plastics and products that would be banned, recycled, or reused under the proposed Program would continue to proliferate throughout the City. As explained in Section 3.2.3.2.1, the upstream Program would have substantial benefits to aesthetic resources. Therefore, the continued and increased use of single-use plastics and subsequent entry into the

environment under the No Program Alternative would be greater than those under the Program, because the beneficial impacts of the Program would not be realized.

5.2.1.2 Air Quality

Under the No Program Alternative, air quality impacts associated with single-use plastics are primarily related to the production and delivery of these products ultimately to the consumer as well as end-of-life disposition of such products including truck trips associated with the collection and transport of recyclables, organic materials, and municipal solid waste to the respective processing facilities or disposal sites, and emissions associated with reuse processing and/or disposal and eventual decomposition. The No Program Alternative would not change air quality and emission trends from existing conditions. As such, the impacts of the No Program Alternative on air quality would be less than those of the Program.

5.2.1.3 Biological Resources

Under the No Program Alternative, the single-use plastics and products that would be banned, recycled, or reused under the proposed Program would continue to proliferate throughout the City. As explained in Section 3.5.3.2.1, single-use plastics pose a risk to biological resources when they enter the environment via beach littering, road runoff, illegal dumping, sewage, wastewater treatment discharge, sewage sludge use in agriculture, and landfills. The adverse impacts of plastics on biological resources include reduced feeding capacity, energy reserves, and reproductive success, impaired digestive and immune system function, developmental abnormalities, thyroid disruption, and mortality, as well as injury and death via entanglement.

Therefore, the continued and increased use of single-use plastics and subsequent entry into the environment under the No Program Alternative would have greater impacts to special status species, riparian habitats or sensitive natural communities, protected wetlands, the movement of wildlife, and common wildlife compared to the Program because the beneficial impacts of the proposed Program on biological resources would not be realized.

5.2.1.4 Energy

Under the No Program Alternative, local energy impacts of single-use plastics would continue to be associated with truck trips related to the delivery of products to regional distribution centers and/or point-of-sale locations, as well as end-of-life transport including truck trips associated with collection and transport of recyclables, organic materials, and municipal solid waste to the respective processing facilities and return logistics for existing reuse programs. The No Program Alternative would not change energy use and consumption trends from existing conditions. As such, the impacts of the No Program Alternative on energy resources would be less than those of the Program.

5.2.1.5 Greenhouse Gas Emissions

Under the No Program Alternative, GHG impacts associated with single-use plastics are primarily related to the production and delivery of these products ultimately to the consumer as well as end-of-life disposition of such products including truck trips associated with the collection and transport of recyclables, organic materials, and municipal solid waste to the respective processing facilities or

disposal sites, and GHGs associated with reuse processing and/or disposal and eventual decomposition. The No Program Alternative would not change GHG emissions and emission trends from existing conditions. As such, the impacts of the No Program Alternative on GHG emissions would be less than those of the Program.

5.2.1.6 Hazards and Hazardous Materials

Under the No Program Alternative, single-use plastics would continue to be a source of human exposure to harmful chemicals, as described in Section 3.10.3.2.1, and would have greater impacts compared to the proposed Program because the beneficial impacts of the proposed Program on human health would not be realized.

5.2.1.7 Hydrology and Water Quality

Under the No Program Alternative, single-use plastics would continue to be a source of litter in terrestrial and aquatic environments in the City and an impediment to the City's ability to meet TMDL goals. Therefore, the No Program Alternative would have greater impacts on water quality compared to the proposed Program, and the beneficial impacts of the proposed Program would not be realized.

5.2.1.8 Land Use and Planning

The No Program Alternative would not result in construction of any infrastructure and would not result in any changes in land use and zoning. It would not divide an established community. However, the No Program Alternative would not support the L.A.'s Green New Deal (City of Los Angeles 2019), which lays out targets for waste reduction. Therefore, the No Program Alternative would conflict with local land use plans, and impacts would be greater than those of the proposed Program because the beneficial impact of the proposed Program in meeting L.A.'s Green New Deal targets would not be realized.

5.2.1.9 Noise

Under the No Program Alternative, noise impacts associated with continued use of single-use plastic in the City would be associated with truck trips and traffic noise associated with the collection and transport of recyclables, organic materials, and municipal solid waste to the respective processing facilities. Similarly, vibrations due to rubber-tire heavy vehicles traveling along uneven roadways within proximity to sensitive uses would continue to occur. The No Program Alternative would not directly result in exposure of people residing or working in the project area to excessive noise levels associated with private airstrips, airport land use plan area, or public airport. Therefore, the impacts of the No Program Alternative on noise would be less than those of the Program.

5.2.1.10 Transportation

Traffic and transportation impacts associated with single-use plastics in the City are primarily related to truck trips related to the delivery of products to regional distribution centers and/or point-of-sale locations, as well as end-of-life transport including truck trips associated with the collection and transport of recyclables, organic materials, and municipal solid waste to the respective processing facilities and return logistics for reuse programs. Under the No Program Alternative, these truck trips would be expected to incrementally increase with population growth and increased single-use plastic

use and disposal. The No Program Alternative would not involve any transportation-related design features or incompatible uses that would increase transportation-related hazards nor would they result in any road changes or traffic obstructions that reduce or otherwise affect emergency access. Therefore, the impacts of the No Program Alternative on transportation, transportation hazards, or emergency access would be less than those of the Program.

5.2.1.11 Utilities and Service Systems

The No Program Alternative would not result in the relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage features and would not impact water supply or wastewater treatment capacity in the City.

Under the No Program Alternative, the City would not implement various measures to reduce the use and disposal of single-use plastics in the City and therefore solid waste in the City would not be reduced under the Program. Therefore, the No Program Alternative would impair the attainment of solid waste reduction goals, and impacts would be greater than those for the proposed Program because the beneficial impacts of the Program on solid waste reduction would not be realized.

5.2.2 Alternative 2: Extended Producer Responsibility

The EPR 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 continued use of all types of plastic materials with an emphasis on recycling. Further, the success of the EPR 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 EPR 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 that would be banned under the Program.

These Program elements are different from, but complementary to, SB 54 because the Program targets specific products and end uses. This EPR Alternative would only apply to those Program elements for which a ban or restriction is currently proposed. For each of these Program elements, this alternative would replace the ban or restriction with an extended producer responsibility program that, unlike SB 54, targets specific products and end uses. This alternative would continue the nature of the City Program in being different from, but complimentary to, SB 54.

The comparative Impacts of the EPR Alternative are provided below. The following would have no impact or no change in impact resulting from the EPR Alternative and are not analyzed further in this section:

- Agriculture and Forestry
- Cultural Resources
- Geology and Soils
- Land Use and Planning
- Mineral Resources
- Population and Housing
- Public Services
- Recreation
- Tribal Cultural Resources
- Wildfire

All downstream impacts for this alternative would be the same as those identified for the proposed Program. Therefore, a resource-specific comparative analysis of downstream impacts from the EPR Alternative is not provided below. The comparative evaluation of the potential impacts based on Alternative 2, EPR requirements for upstream measures, is provided below. This analysis focuses on the four Program elements for which replacement of a ban with an EPR program would be feasible: single-use plastic water bottles, single-use plastic beverage holder rings, plastic bag clips, and single-use e-cigarettes and vape cartridges.

5.2.2.1 Aesthetics

Unlike the proposed Program, single-use plastic water bottles, single-use plastic beverage holder rings, plastic bag clips, and single-use e-cigarettes and vape cartridges would be allowed to be sold within the City and would therefore be potential sources of trash that could adversely affect aesthetics in the City. Therefore, while the EPR Alternative would still reduce overall potential sources of trash in the City (e.g., via the requirement for refillable bottles or reusable foodware for dine-in services), the impacts of the alternative would be greater than those of the Program, and it would not achieve the same level of beneficial impacts with respect to aesthetics as the proposed Program.

5.2.2.2 Air Quality

As for the proposed Program, air quality impacts associated with the implementation of the upstream EPR Alternative upstream measures policies are primarily related to the transition to alternative materials associated with bans that would still occur under the alternative and the change in truck trips associated with the collection and transport of recyclables, organic materials, and municipal solid waste to the respective processing facilities and return logistics for reuse or take-back programs. An increase in take-back programs would have the potential to increase trips required for consumers to transport used products to the specified collection points. The increase in VMT would be highly dependent on customer behavior and method of return which may include return by the customer to the collection point or shipment of the used product by mail to the recycling facility. Where used products may be returned to the point-of-sale, it is assumed that customers would return used products the next time they purchase a new product. For other return schemes, the relative increase in VMT associated with extra trips would be highly dependent on the roundtrip distance and percentage of extra trips. As an example, assuming 5% of used products require an extra trip to return, the additional VMT would be 250 miles for every 1,000 cartridges for a 5-mile roundtrip compared to 1,000 miles for a 10-mile roundtrip assuming 10% of used products require an extra trip for return. No other sources of emissions different than the proposed Program are identified for the EPR Alternative. Therefore, the EPR Alternative upstream measures would have a similar level of impact on air quality as the proposed Program and would not conflict with or obstruct implementation of the applicable air quality plan, 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 air quality standard, expose sensitive receptors to substantial pollutant concentrations, or result in other emissions (such as those leading to odors) adversely affecting a substantial number of people, and impacts would be less than significant and similar to the proposed Program.

5.2.2.3 Biological Resources

Unlike the Program, single-use plastic water bottles, single-use plastic beverage holder rings, plastic bag clips, and single-use e-cigarettes and vape cartridges would be allowed to be sold within the City and would be potential sources of trash that could adversely affect wildlife in the City. Therefore, while the EPR Alternative would still reduce overall potential sources of trash in the City (e.g., via the requirement for refillable bottles or reusable foodware for dine-in services), it would have greater impacts on biological resources as it would not achieve the same level of beneficial impacts with respect to biological resources as the proposed Program.

5.2.2.4 Energy

As for the proposed Program, local energy impacts associated with the implementation of the EPR Alternative upstream measures are primarily related to the transition to alternative materials along with the change in truck trips associated with the collection and transport of recyclables, organic materials, and municipal solid waste to the respective processing facilities and return logistics for reuse programs. It is assumed that take-back programs for single-use plastic water bottles, single-use plastic beverage holder rings, plastic bag clips, and single-use e-cigarettes and vape cartridges would be facilitated from existing operation locations and would not require construction of new facilities. An increase in take-back programs would have the potential to increase trips required for consumers to transport used products to the specified collection points. The increase in VMT would be highly dependent on customer behavior and method of return which may include return by the customer to the collection point or shipment of the used product by mail to the recycling facility. Where used products may be returned to the point of sale, it is assumed that customers would return used products the next time they purchase a new product. For other return schemes, the relative increase in VMT associated with extra trips would be highly dependent on the roundtrip distance and percentage of extra trips. As an example, assuming 5% of used products require an extra trip to return, the additional VMT would be 250 miles for every 1,000 cartridges for a 5-mile roundtrip compared to 1,000 miles for a 10-mile roundtrip assuming 10% of used products require an extra trip for return. Therefore, the EPR Alternative would have the similar level of impact as compared with the proposed Program and would not result in wasteful, inefficient, or unnecessary consumption of energy resources and would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency and impacts would be less than significant, similar to the proposed Program.

5.2.2.5 Greenhouse Gas Emissions

As for the proposed Program, GHG impacts associated with the implementation of the EPR Alternative upstream measures are primarily related to the transition to alternative materials along with the change in truck trips associated with the collection and transport of recyclables, organic materials, and municipal solid waste to the respective processing facilities and return logistics for reuse programs. It is assumed that take-back programs for single-use plastic water bottles, single-use plastic beverage holder rings, plastic bag clips, and single-use e-cigarettes and vape cartridges would be facilitated from existing operation locations and would not require construction of new facilities. An increase in take-back programs would have the potential to increase trips required for consumers to transport used products to the specified collection points. The increase in VMT would be highly dependent on customer behavior

and method of return which may include return by the customer to the collection point or shipment of the used product by mail to the recycling facility. Where used products may be returned to the point of sale, it is assumed that customers would return used products the next time they purchase a new product. For other return schemes, the relative increase in VMT associated with extra trips would be highly dependent on the roundtrip distance and percentage of extra trips. As an example, assuming 5% of used products require an extra trip to return, the additional VMT would be 250 miles for every 1,000 used products for a 5-mile round-trip compared to 1,000 miles for a 10-mile roundtrip assuming 10% of used products require an extra trip for return. However, recycling and reuse schemes associated with take-back programs would reduce overall VMT associated with production of the avoided virgin products and trips to landfills located outside of the City for materials that are otherwise disposed of. Accordingly, take-back programs are not expected to result in a measurable net increase in direct or indirect GHG emissions associated with transportation requirements. Therefore, the impacts associated with this alternative are considered less than significant and similar to the proposed Program as it would not have the potential to result in a significant impact on the environment, and would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

5.2.2.6 Hazards and Hazardous Materials

Unlike the Program, single-use plastic water bottles, single-use plastic beverage holder rings, plastic bag clips, and single-use e-cigarettes and vape cartridges would be allowed to be sold within the City. As described in Section 3.10.3.2.1, single-use plastic water bottles and single-use e-cigarettes and vape cartridges pose human health hazards and allowing them under the EPR Alternative would not remove these potentially harmful products from within the City. Therefore, the EPR Alternative would have greater impacts than the proposed Program with respect to creating a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

5.2.2.7 Hydrology and Water Quality

Unlike the Program, single-use plastic water bottles, single-use plastic beverage holder rings, plastic bag clips, and single-use e-cigarettes and vape cartridges would be allowed to be sold within the City and would therefore be potential sources of trash that could have an adverse effect on TMDLs within the City's waterbodies. Therefore, while the EPR Alternative would still reduce overall potential sources of trash in the City (e.g., via the requirement for refillable bottles or reusable foodware for dine-in services), it would have a greater impact than the proposed Program as it would not achieve the same level of beneficial impacts with respect to water quality as the proposed Program.

5.2.2.8 Noise

Similar to the proposed Program, the primary source of noise associated with upstream measures would be associated with any resulting changes in truck traffic. The EPR Alternative upstream measures would not result in a significant change in trips associated with purchase or disposal of alternative materials/products similar to the proposed Program, as detailed in Section 3.18, Transportation. No other sources of noise have been identified for the proposed Program or the EPR alternative. Therefore, noise impacts associated with implementation of the EPR Alternative would be less than significant.

Similar to the proposed Program, the EPR Alternative upstream policies have the potential to result in additional heavy vehicle trips on uneven roadways that may result in perceptible vibration at nearby receptors. Rubber-tire heavy vehicles traveling on roadways typically would not produce a significant vibration impact, except in situations where a large number of heavy vehicles are traveling along uneven roadways within proximity to sensitive uses. However, perceptible groundborne vibration generated by heavy vehicles on uneven roadways is typically limited to distances of up to 75 feet and would not be sufficient to cause building damage. Therefore, impacts related to groundborne vibration or groundborne noise levels would be less than significant and similar to the proposed Program.

5.2.2.9 Transportation

As with the proposed Program, traffic and transportation impacts associated with the implementation of the EPR Alternative upstream measures are primarily related to the change in truck trips associated with the collection and transport of recyclables, organic materials, and municipal solid waste to the respective processing facilities and return logistics for reuse programs. An increase in take-back programs would have the potential to increase trips required for consumers to transport used products to the specified collection points. The increase in VMT would be highly dependent on customer behavior and method of return which may include return by the customer to the collection point or shipment of the used product by mail to the recycling facility. Where used products may be returned to the point of sale, it is assumed that customers would return used products the next time they purchase a new product. For other return schemes, the relative increase in VMT associated with extra trips would be highly dependent on the roundtrip distance and percentage of extra trips. As an example, assuming 5% of used products require an extra trip to return, the additional VMT would be 250 miles for every 1,000 used products for a 5-mile roundtrip compared to 1,000 miles for a 10-mile roundtrip assuming 10% of used products require an extra trip for return, representing 0.00007 Household VMT per capita and 0.0003 Household VMT per capita, respectively. Any additional trips generated as a result of returning the used products would not have the potential to exceed the daily Household VMT per capita threshold of 6.0 to 9.4 (depending on APC Area; refer to Table 3.18-3) and would be distributed throughout the City and is not expected to conflict with adopted policies, plans, and programs to encourage the use of alternative transportation. Compared to the proposed Program, because single-use plastic water bottles would still be allowed under the EPR Alternative, it is expected that it would result in fewer substitutions with reusable products and the potential impacts caused by transportation of reusable or non-plastic bottles. In addition, recycling and reuse schemes associated with take-back programs would reduce overall VMT associated with production of the avoided virgin products and trips to landfills located outside of the City for materials that are otherwise disposed of. Further, this policy would not alter the surrounding transportation system, and therefore would not preclude the future establishment of transit, bicycle, and/or pedestrian facilities. Therefore, the EPR Alternative would have a similar level of impact as compared with the proposed Program and impacts pertaining to conflicts with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities would be less than significant and similar to the proposed Program.

5.2.2.10 Utilities and Service Systems

Unlike the Program, single-use plastic water bottles, single-use plastic beverage holder rings, plastic bag clips, and single-use e-cigarettes and vape cartridges would be allowed to be sold within the City. As

noted in Section 5.1.2.2, the reduction of waste from an EPR program depends on the behavior of the consumer to return the single-use items to the producer and the producer's recycling or reuse once the item is returned. Thus, requiring EPR programs for these products would remove a certain volume from the City's solid waste facilities but because there would not be 100% compliance from consumers, a certain volume would still end up in the City's solid waste facilities. Therefore, the EPR Alternative's upstream measures would have a beneficial impact on solid waste in the City and compliance with solid waste regulations but would have greater impacts than the proposed Program as it would not achieve the same level of beneficial impact as the proposed Program.

5.3 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 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.

In summary, the Program best meets the Program objectives and has the most environmental benefits. The environmental impacts of the Program's upstream measures would be due to the use of alternative materials to replace banned materials, and the impacts of downstream measures would be largely due to construction activities of facilities.

Table 5.3-1. 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

Would the Program?	Program	Alternative 1 – No Program	Alternative 2 – EPR	Mitigation Measures
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
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

Would the Program?	Program	Alternative 1 – No Program	Alternative 2 – EPR	Mitigation Measures
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
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	

Would the Program?	Program	Alternative 1 – No Program	Alternative 2 – EPR	Mitigation Measures
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
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

Would the Program?	Program	Alternative 1 – No Program	Alternative 2 – EPR	Mitigation Measures
				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
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

Would the Program?	Program	Alternative 1 – No Program	Alternative 2 – EPR	Mitigation Measures
	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
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

Would the Program?	Program	Alternative 1 – No Program	Alternative 2 – EPR	Mitigation Measures
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
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

Would the Program?	Program	Alternative 1 – No Program	Alternative 2 – EPR	Mitigation 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
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

Would the Program?	Program	Alternative 1 – No Program	Alternative 2 – EPR	Mitigation Measures
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
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

Would the Program?	Program	Alternative 1 – No Program	Alternative 2 – EPR	Mitigation Measures
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
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

Would the Program?	Program	Alternative 1 – No Program	Alternative 2 – EPR	Mitigation Measures
	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
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;	Upstream: No Impact	Upstream: No Impact	Upstream: No Impact	None
(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?	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

Would the Program?	Program	Alternative 1 – No Program	Alternative 2 – EPR	Mitigation Measures
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
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

Would the Program?	Program	Alternative 1 – No Program	Alternative 2 – EPR	Mitigation Measures
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
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

Would the Program?	Program	Alternative 1 – No Program	Alternative 2 – EPR	Mitigation Measures
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
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	Upstream: No Impact	Upstream: No Impact	Upstream: No Impact	None

Would the Program?	Program	Alternative 1 – No Program	Alternative 2 – EPR	Mitigation Measures
protection? Police protection? Schools? Parks? Other public facilities?				
	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
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

Would the Program?	Program	Alternative 1 – No Program	Alternative 2 – EPR	Mitigation Measures
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
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

Would the Program?	Program	Alternative 1 – No Program	Alternative 2 – EPR	Mitigation Measures
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
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

Would the Program?	Program	Alternative 1 – No Program	Alternative 2 – EPR	Mitigation Measures
				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
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

Would the Program?	Program	Alternative 1 – No Program	Alternative 2 – EPR	Mitigation Measures
				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
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

Would the Program?	Program	Alternative 1 – No Program	Alternative 2 – EPR	Mitigation Measures
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
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