

# 7 Alternatives

## 7.1 Introduction

The identification and analysis of alternatives is a fundamental concept under CEQA. This is evident in that the role of alternatives in an EIR is set forth clearly and forthrightly within the CEQA statutes. Specifically, CEQA §21002.1(a) states:

*“The purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided.”*

The CEQA Guidelines require an EIR to “describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives” (CEQA Guidelines §15126.6(a)). The CEQA Guidelines direct that selection of alternatives focus on those alternatives capable of eliminating any significant environmental effects of the project or of reducing them to a less-than significant level, even if these alternatives would impede to some degree the attainment of project objectives, or would be more costly. In cases where a project is not expected to result in significant impacts after implementation of recommended mitigation, review of project alternatives is still appropriate.

The range of alternatives required within an EIR is governed by the “rule of reason” which requires an EIR to include only those alternatives necessary to permit a reasoned choice. The discussion of alternatives need not be exhaustive. Furthermore, an EIR need not consider an alternative whose implementation is remote and speculative or whose effects cannot be reasonably ascertained.

Alternatives that were considered but were rejected as infeasible during the scoping process should be identified along with a reasonably detailed discussion of the reasons and facts supporting the conclusion that such alternatives were infeasible.

Based on the alternatives analysis, an environmentally superior alternative is designated among the alternatives. If the environmentally superior alternative is the No Project Alternative, then the EIR shall identify an environmentally superior alternative among the other alternatives (CEQA Guidelines §15126.6(e)(2)).

## 7.2 Criteria for Alternatives Analysis

As stated above, pursuant to CEQA, one of the criteria for defining project alternatives is the potential to attain the project objectives. Established objectives of the project applicant for the proposed project include:

- Develop a geothermal power plant with minimal disturbance footprint and environmental impacts by siting the facility on an existing disturbed industrial site.
- Develop clean, renewable geothermal energy in the Heber Geothermal Zone pursuant to the Imperial County General Plan.
- Utilize a location that is in close proximity to existing energy generation facilities and electrical transmission system.

- Develop supporting renewable energy solar PV facilities to support the geothermal power plant operations.
- Use proven and established PV technology that is efficient and requires low maintenance.
- Provide renewable baseload energy and capacity to assist the State of California with meeting the objectives of Senate Bill 100 (100% Clean Energy Act of 2018) and the State's Renewables Portfolio Standard program.
- Minimize and mitigate any potential impact to sensitive environmental resources within the project area.

## 7.3 Alternatives Considered but Rejected

### 7.3.1 Alternative Site

Section 15126.6(f)(2) of the CEQA Guidelines addresses alternative locations for a project. The key question and first step in the analysis is whether any of the significant effects of the proposed project would be avoided or substantially lessened by constructing the proposed project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need to be considered for inclusion in the EIR. Further, CEQA Guidelines Section 15126.6(f)(1) states that among the factors that may be taken into account when addressing the feasibility of alternative locations are whether the project proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent).

The proponent does not have control of an alternate site; if control were viable, the proponent would have to re-initiate the application process as a new project. Similar to the proposed project site, an alternate site would require environmental review once the proponent has prepared sufficient project description information. At present, the proponent does not have control of an alternate site. Alternative sites would also lack the benefits of located the proposed project next to existing facilities. Furthermore, geothermal resources (and solar facilities to complement them) are limited in their available locations. This alternative would likely be the most complex, costly, and time-consuming alternative to implement, and the environmental benefits are unlikely. For these reasons an alternative site was eliminated from further consideration in this EIR.

## 7.4 Alternative 1: No Project/No Development Alternative

The CEQA Guidelines require analysis of the No Project Alternative (PRC Section 15126). According to Section 15126.6(e)(1), "the specific alternative of 'no project' shall also be evaluated along with its impact." Also, pursuant to Section 15126.6(e)(2); "The 'no project' analysis shall discuss the existing conditions at the time the notice of preparation is published, ... at the time environmental analysis is commenced, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services."

The No Project/No Development Alternative assumes that the project, as proposed, would not be implemented and the project site would not be further developed with geothermal and solar energy facilities. The No Project/No Development Alternative would not meet the project objectives.

## 7.4.1 Environmental Impact of Alternative 1: No Project/No Development Alternative

### Aesthetics

Under the No Project/No Development Alternative, the project site would not be developed and would continue to be undeveloped land. The No Project/No Development Alternative would not modify the existing project site or add construction to the project site; therefore, there would be no change to the existing condition of the site. Under this alternative, there would be no potential to create a new source of light or glare associated with the PV arrays. As discussed in greater detail in Section 3.2, Aesthetics, the proposed project would result in a less than significant impact associated with introduction of new sources of light and glare. Under this alternative, no impacts related to light, glare, and aesthetic impacts would occur.

### Agricultural Resources

As discussed in Section 3.3, Agricultural Resources, implementation of the project would result in the temporary conversion of approximately 106.88 acres of land currently under or available for agricultural production to non-agricultural uses, as described below:

- Dogwood Geothermal Energy Project (CUP #23-0020): Approximately 5.31 acres of the Dogwood parasitic solar facility footprint are classified as Prime Farmland and 34.67 acres are classified as Farmland of Statewide Importance.
- Heber 2 Solar Energy Project (CUP #23-0021): Approximately 17.63 acres of the Heber 2 parasitic solar facility footprint are classified as Prime Farmland and 49.27 acres are classified as Farmland of Statewide Importance.

Compared to the proposed project, implementation of this alternative would avoid the conversion of Prime Farmland and Farmland of Statewide Importance. Therefore, this alternative would not contribute to the conversion of agricultural lands or otherwise adversely affect agricultural operations. Compared to the proposed project, this alternative would avoid the need for future restoration of the project site to pre-project conditions.

### Air Quality

Under the No Project/No Development Alternative, there would be no air emissions associated with project construction or operation, and no project- or cumulative-level air quality impact would occur. Therefore, no significant impacts to air quality or violation of air quality standards would occur under this alternative. Moreover, this alternative would be consistent with existing air quality attainment plans and would not result in the creation of objectionable odors.

As discussed in Section 3.4, Air Quality, the proposed project would not exceed the ICAPCD's significance thresholds during both the construction and operational phases of the project. Although no significant air quality impacts would occur, all construction projects within Imperial County must comply with the requirements of ICAPCD Regulation VIII for the control of fugitive dust. In addition, the ICAPCD's Air Quality Handbook lists additional feasible mitigation measures that may be warranted to control emissions of fugitive dust and combustion exhaust.

This alternative would not result in air quality emissions compared to the proposed project, the majority of which would occur during construction. The No Project/No Development Alternative would not reduce the long-term need for renewable electricity generation. As a consequence, while the No

Project/No Development Alternative would not result in new impacts to air quality as a result of construction, it would likely not realize the overall benefits to regional air quality when compared to the operation of the proposed project.

## Biological Resources

Under the No Project/No Development Alternative, existing biological resource conditions within the project site would largely remain unchanged and no impact would be identified. Unlike the proposed project which requires mitigation for biological resources including burrowing owl and nesting birds, this alternative would not result in construction activities that could otherwise result in significant impacts to these biological resources. Compared to the proposed project, this alternative would avoid impacts to biological resources.

## Cultural Resources

The proposed project would involve ground-disturbing activities that have the potential to disturb previously undocumented cultural resources that could qualify as historical resources or unique archaeological resources pursuant to CEQA. Under the No Project/No Development Alternative, the project site would not be developed, and no construction-related ground disturbance would occur. Therefore, compared to the proposed project, this alternative would avoid impacts to cultural resources.

## Energy

Because there would be no development at the project site under the No Project/No Development Alternative, no grading or construction of new facilities would occur. Compared to the proposed project, the No Project/No Development Alternative would not result in energy consumption associated with the operation of construction equipment. Therefore, no impact is identified for this alternative.

## Geology and Soils

Because there would be no development at the project site under the No Project/No Development Alternative, no grading or construction of new facilities would occur. Therefore, there would be no impact to project-related facilities as a result of local seismic hazards (strong ground shaking), soil erosion, and paleontological resources. In contrast, the proposed project would require the incorporation of mitigation measures related to potential seismic hazards, soil erosion, and paleontological resources to minimize impacts to a less than significant level. Compared to the proposed project, this alternative would avoid significant impacts related to local geology and soil conditions and paleontological resources.

## Greenhouse Gas Emissions

Under the No Project/No Development Alternative, there would be no GHG emissions resulting from project construction or operation or corresponding impact to global climate change. The No Project/No Development Alternative would not help California meet its statutory and regulatory goal of increasing renewable power generation, including GHG reduction goals of SB 32. While this alternative would not further implement policies (e.g., SB X1-2) for GHG reductions, this alternative would also not directly conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. This alternative would not create any new GHG emissions during construction but would not lead to a long-term beneficial impact to global climate change by providing renewable

clean energy. For the proposed project, a less than significant impact was identified for construction-related GHG emissions, and in the long-term, the project would result in an overall beneficial impact to global climate change as the result of creation of clean renewable energy, that does not generate GHG emissions. While the No Project/No Development Alternative would not result in new GHG emissions during construction, it would be less beneficial to global climate change as compared to the proposed project. Further, the construction emissions associated with the project would be off-set by the beneficial renewable energy provided by the project, negating any potential that the No Project/No Development alternative would reduce construction-related GHG emissions.

### Hazards and Hazardous Materials

The No Project/No Development Alternative would not include any new construction and would not require the installation of two 20,000-gallon isopentane vessels on the project site. Compared to the proposed project, this alternative would avoid the potential hazards to the public attributed to the storage, transport, and use of isopentane motive fluid.

### Hydrology/Water Quality

The No Project/No Development Alternative would not result in modifications to the existing drainage patterns or volume of storm water runoff as attributable to the proposed project, as the existing site conditions and on-site pervious surfaces would remain unchanged. In addition, no changes with regard to water quality would occur under this alternative. Therefore, compared to the proposed project, this alternative would avoid impacts to hydrology and water quality.

### Land Use/Planning

As discussed in Section 3.12, Land Use/Planning, the proposed project would not physically divide an established community or conflict with applicable plans, policies, or regulations. Under the No Project/No Development Alternative, the project site would not be developed and continue to be undeveloped land. Current land uses would remain the same. No CUPs would be required under this alternative. Under this alternative, no existing community would be divided, and no inconsistencies with planning policies would occur. No land use impacts would occur.

### Noise

This alternative would not require construction or operation of the project facilities; therefore, this alternative would not increase ambient noise levels within the vicinity of the project site. For this reason, no noise impacts would occur. As discussed in Section 3.13, Noise and Vibration, the proposed project would not result in significant noise impacts to sensitive receptors during construction and operation. Compared to the proposed project, this alternative would not generate noise and would not result in any noise or vibration impacts.

### Public Services

The No Project/No Development Alternative would not increase the need for public services which would otherwise be required for the proposed project (additional police or fire protection services). Therefore, no impact to public services is identified for this alternative.

## Transportation

There would be no new development under the No Project/No Development Alternative. Compared to the proposed project, this alternative would not generate vehicular trips during construction or operation. For these reasons, no impact would occur and this alternative would not impact any applicable plan, ordinance, or policy addressing the performance of the circulation system, substantially increase hazards because of a design feature, result in inadequate emergency access, or conflict with public transit, bicycle, or pedestrian facilities.

## Tribal Cultural Resources

The proposed project would involve ground-disturbing activities that have the potential to disturb previously undocumented tribal cultural resources. Under the No Project/No Development Alternative, the project site would not be developed, and no construction-related ground disturbance would occur. Therefore, compared to the proposed project, this alternative would avoid potential impacts to tribal cultural resources.

## Utilities and Service Systems

Compared to the proposed project, the No Project/No Development Alternative would not require the expansion or extension of existing utilities, since there would be no new project facilities that would require utility service. No solid waste would be generated under this alternative. Therefore, this alternative would result in no impacts to existing utilities or solid waste facilities.

## Conclusion

Implementation of the No Project/No Development Alternative would generally result in reduced impacts for a majority of the environmental issues areas considered in Chapter 3, Environmental Analysis when compared to the proposed project. A majority of these reductions are realized in terms of significant impacts that are identified as a result of project construction. However, this alternative would not realize the benefits of reduced GHG emissions associated with energy use, which are desirable benefits that are directly attributable to the proposed project.

## Comparison of the No Project/No Development Alternative to Project Objectives

The No Project/No Development Alternative would not meet the objectives of the project. Additionally, the No Project/No Development Alternative would not help California meet its statutory and regulatory goal of increasing renewable power generation, including GHG reduction goals of SB 32.

## 7.5 Alternative 2: Reduced Project Site

The purpose of this alternative is to avoid the Prime Farmland located within the project site. As discussed in Section 3.3, Agricultural Resources, implementation of the project would result in the temporary conversion of approximately 106.88 acres of land currently under or available for agricultural production to non-agricultural uses, as described below:

- Dogwood Geothermal Energy Project (CUP #23-0020): Approximately 5.31 acres of the Dogwood parasitic solar facility footprint are classified as Prime Farmland and 34.67 acres are classified as Farmland of Statewide Importance.

- Heber 2 Solar Energy Project (CUP #23-0021): Approximately 17.63 acres of the Heber 2 parasitic solar facility footprint are classified as Prime Farmland and 49.27 acres are classified as Farmland of Statewide Importance.

This alternative would avoid approximately 22.94 acres of Prime Farmland on the project site (5.31 acres on Dogwood parasitic solar facility footprint and 17.63 acres on the Heber 2 parasitic solar facility footprint). The size and MW output of the solar facilities would be slightly reduced under this alternative.

## 7.5.1 Environmental Impact of Alternative 2: Reduced Project Site

### Aesthetics

Under Alternative 2, the overall size of the solar energy facilities would be reduced. No significant visual aesthetic impact has been identified as the proposed project's facilities would not impact scenic resources, result in the substantial degradation of the existing visual character of the project site, or add a substantial amount of light and glare. As such, this alternative would not avoid or reduce any significant impacts identified for the project and the aesthetic impact would be similar to the proposed project.

### Agricultural Resources

Under Alternative 2, the conversion of approximately 22.94 acres of Prime Farmland to non-agricultural uses would be avoided on the project site. However, the solar facilities would still be located on land designated as Farmland of Statewide Importance and would still require mitigation for the temporary conversion of Farmland of Statewide Importance to non-agricultural uses to reduce significant impacts to a less than significant level. Impacts associated with contributing to the conversion of other agricultural lands or otherwise affecting agricultural operations would still occur, but would be less than would occur under the proposed project. Compared to the proposed project, this alternative would result in less of an impact on agricultural resources as compared to the proposed project.

### Air Quality

Under Alternative 2, air emissions during construction would be less than the proposed project because of the reduced site development. As discussed in Section 3.4, Air Quality, the proposed project would not exceed the ICAPCD's significance thresholds during both the construction and operational phases of the project. Although no significant air quality impacts would occur, all construction projects within Imperial County must comply with the requirements of ICAPCD Regulation VIII for the control of fugitive dust. In addition, the ICAPCD's Air Quality Handbook lists additional feasible mitigation measures that may be warranted to control emissions of fugitive dust and combustion exhaust. Similar to the proposed project, this alternative would be consistent with existing AQMPs and would not result in the creation of objectionable odors. Compared to the proposed project, this alternative would result in less air quality impacts.

### Biological Resources

Under Alternative 2, the overall size of the solar energy facilities would be reduced. Although the overall size of the solar energy facilities would be reduced, there is still potential for impacts on special-



status species. Compared to the proposed project, this alternative would result in a reduction in impacts on biological resources, but would still require mitigation.

## Cultural Resources

Although the overall size of the solar energy facilities would be reduced, this alternative would still require ground-disturbing activities, which has the potential to disturb undocumented cultural resources that could qualify as historical resources or unique archaeological resources pursuant to CEQA, and human remains. Compared to the proposed project, this alternative would result in a reduction in impacts on cultural resources because of the reduced site development, but would still require mitigation related to monitoring for inadvertent discovery.

## Energy

Although the overall size of the solar energy facilities would be reduced, this alternative would still result in energy consumption associated with the operation of construction equipment. Compared to the proposed project, the No Project/No Development Alternative would result in slightly less energy consumption due to a reduced project site. However, impacts would be less than significant similar to the proposed project.

## Geology and Soils

Under Alternative 2, while the overall project footprint would be reduced, grading and construction of new facilities, such as the geothermal plant, solar facilities, and geothermal wells would still occur. Similar to the proposed project, this alternative would also be subject to potential impacts related to strong ground shaking, soil erosion, and paleontological resources, and incorporation of mitigation measures would be required to minimize these impacts to a less than significant level. This alternative would result in similar geology and soil and paleontological resources impacts as the proposed project.

## Greenhouse Gas Emissions

Under Alternative 2, the overall project footprint would be reduced, thereby contributing to reductions in GHG emissions during project construction. However, as a consequence of the reduced size of the project, this alternative would result in a reduced power production capacity as compared to the proposed project; hence, the overall benefits of the project to global climate change through the creation of renewable energy would also be reduced. This alternative would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. Similar to the proposed project, this alternative would not exceed SCAQMD's screening threshold of 3,000 metric tons of CO<sub>2</sub>e per year. This alternative would contribute to similar and desirable reductions in GHG emissions and associated contribution to global climate change through the production of renewable energy, although to a lesser degree. This alternative would have a similar impact as the proposed project.

## Hazards and Hazardous Materials

Similar to the proposed project, construction of this alternative would involve the limited use of hazardous materials, such as fuels and greases to fuel and service construction equipment. This alternative would still require the installation of two 20,000-gallon isopentane vessels on the project site and would require mitigation to reduce the potential hazards to the public attributed to the storage, transport, and use of isopentane motive fluid. Similar to the proposed project, no impact associated



with potential safety hazards to the public residing or working within proximity to a public airport would occur. Implementation of this alternative would result in a similar hazards and hazardous materials impact as the proposed project.

### Hydrology/Water Quality

Alternative 2 would result in modifications to the existing drainage patterns and the volume of storm water runoff, as this alternative would introduce impervious area on-site, although to a lesser degree than the proposed project. Because the overall project footprint would be reduced, this alternative would realize a minor reduction in the corresponding impacts on hydrology and on-site drainage; however, the same mitigation measures would be applicable to this alternative. Compared to the proposed project, this alternative would result in less of an impact on hydrology/water quality.

### Land Use Planning

Implementation of this alternative would not avoid or reduce a land use and planning impact, as no significant impact associated with the projects has been identified. As with the proposed project, this alternative would be consistent with the County Land Use Ordinance, Division 17, RE Overlay Zone, which authorizes the development and operation of RE projects with an approved CUP. Implementation of this alternative would be similar to the proposed project with respect to land use and planning.

### Noise

As with the proposed project, Alternative 2 would not result in significant noise impacts associated with construction activities. As with the proposed project, operational impacts associated with this alternative would not expose persons or generate noise levels in excess of applicable noise standards, exposure persons to, or generate excessive groundborne vibration, or expose persons to excessive aircraft noise. This alternative would have similar noise impacts as the proposed project.

### Public Services

Alternative 2 would require increased public services, specifically law enforcement and fire protection services. While the solar facilities would be slightly smaller, the impacts of this alternative to public services and associated service ratios would be similar. Like the proposed project, this alternative would be conditioned to provide law enforcement and fire service development impact fees. Therefore, this alternative would result in a similar impact related to public services as the proposed project.

### Transportation

This alternative would result in a similar level of construction and operation-related vehicle and truck trips as compared to the proposed project. However, the increase in vehicular traffic was identified as a less than significant impact for the proposed projects. In this context, Alternative 2 would not reduce or avoid an impact related to transportation and would result in less than significant impacts similar to the proposed project. As with the proposed project, Alternative 2 would not impact any applicable plan, ordinance, or policy addressing the performance of the circulation system, substantially increase hazards because of a design feature, result in inadequate emergency access, or conflict with public transit, bicycle, or pedestrian facilities. This alternative would result in a similar impact related to transportation as the proposed project.

## Tribal Cultural Resources

Implementation of this alternative would not avoid or reduce a tribal cultural resources impact, as no significant impact associated with the projects has been identified. Impacts to tribal cultural resources under this alternative are similar to the proposed projects.

Although the overall size of the solar energy facilities would be reduced, this alternative would still require ground-disturbing activities, which has the potential to disturb undocumented tribal cultural resources. Compared to the proposed project, this alternative would result in a reduction in impacts on tribal cultural resources because of the reduced site development, but would still require mitigation.

## Utilities and Service Systems

Implementation of this alternative would result in an overall less demand for utilities, including water. However, this alternative would not avoid or reduce a significant impact associated with the project as a less than significant impact to utilities has been identified associated with the project. Implementation of this alternative would not achieve to the same degree the beneficial impacts of providing renewable energy. As compared to the proposed project, the overall demand for utilities would be less under this alternative.

## Conclusion

As shown on Table 7-1, this alternative would reduce impacts to agricultural resources, air quality, biological resources, cultural resources, hydrology/water quality, tribal cultural resources, and utilities/service systems.

## Comparison of Alternative 2: Reduced Project Site

Alternative 2 would meet most of the basic objectives of the proposed project and should remain under consideration. However, as a consequence of the reduced size of the project, this alternative would result in a reduced power production capacity as compared to the proposed project; hence, the overall benefits of the project to global climate change through the creation of renewable energy would also be reduced.

## 7.6 Environmentally Superior Alternative

Table 7-1 provides a qualitative comparison of the impacts for each alternative compared to the proposed project. As noted on Table 7-1, the No Project/No Development Alternative would be considered the environmentally superior alternative, since it would eliminate all of the significant impacts identified for the project. However, CEQA Guidelines Section 15126.6(e)(2) states that “if the environmentally superior alternative is the No Project Alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.” As shown on Table 7-1, Alternative 2 would be the environmental superior alternative because it would reduce impacts for the following environmental issue areas as compared to the proposed project: agricultural resources, air quality, biological resources, cultural resources, hydrology/water quality, tribal cultural resources, and utilities/service systems.



**Table 7-1. Comparison of Alternative Impacts to Proposed Project**

Environmental Issue Area	Proposed Project	Alternative 1: No Project/No Development	Alternative 2: Reduced Project Site
Aesthetics	Less than Significant	<i>CEQA Significance:</i> No Impact <i>Comparison to Proposed Project:</i> No Impact	<i>CEQA Significance:</i> Less than Significant <i>Comparison to Proposed Project:</i> Similar Impact
Agricultural Resources	Less than Significant with Mitigation	<i>CEQA Significance:</i> No Impact <i>Comparison to Proposed Project:</i> No Impact	<i>CEQA Significance:</i> Less than Significant with Mitigation <i>Comparison to Proposed Project:</i> Less Impact
Air Quality	Less than Significant	<i>CEQA Significance:</i> No Impact <i>Comparison to Proposed Project:</i> No Impact	<i>CEQA Significance:</i> Less than Significant <i>Comparison to Proposed Project:</i> Less Impact
Biological Resources	Less than Significant with Mitigation	<i>CEQA Significance:</i> No Impact <i>Comparison to Proposed Project:</i> No Impact (Avoid)	<i>CEQA Significance:</i> Less than Significant with Mitigation <i>Comparison to Proposed Project:</i> Less Impact
Cultural Resources	Less than Significant with Mitigation	<i>CEQA Significance:</i> No Impact <i>Comparison to Proposed Project:</i> No Impact (Avoid)	<i>CEQA Significance:</i> Less than Significant with Mitigation <i>Comparison to Proposed Project:</i> Less Impact

**Table 7-1. Comparison of Alternative Impacts to Proposed Project**

Environmental Issue Area	Proposed Project	Alternative 1: No Project/No Development	Alternative 2: Reduced Project Site
Energy	Less than Significant	<i>CEQA Significance:</i> No Impact <i>Comparison to Proposed Project:</i> No Impact	<i>CEQA Significance:</i> Less than Significant <i>Comparison to Proposed Project:</i> Similar Impact
Geology and Soils	Less than Significant with Mitigation	<i>CEQA Significance:</i> No Impact <i>Comparison to Proposed Project:</i> No Impact (Avoid)	<i>CEQA Significance:</i> Less than Significant with Mitigation <i>Comparison to Proposed Project:</i> Similar Impact
GHG Emissions	Less than Significant	<i>CEQA Significance:</i> No Impact <i>Comparison to Proposed Project:</i> No Impact	<i>CEQA Significance:</i> Less than Significant <i>Comparison to Proposed Project:</i> Similar Impact
Hazards and Hazardous Materials	Less than Significant with Mitigation	<i>CEQA Significance:</i> No Impact <i>Comparison to Proposed Project:</i> No Impact	<i>CEQA Significance:</i> Less than Significant with Mitigation <i>Comparison to Proposed Project:</i> Similar Impact
Hydrology/ Water Quality	Less than Significant with Mitigation	<i>CEQA Significance:</i> No Impact <i>Comparison to Proposed Project:</i> No Impact (Avoid)	<i>CEQA Significance:</i> Less than Significant with Mitigation <i>Comparison to Proposed Project:</i> Less Impact



**Table 7-1. Comparison of Alternative Impacts to Proposed Project**

Environmental Issue Area	Proposed Project	Alternative 1: No Project/No Development	Alternative 2: Reduced Project Site
Land Use/Planning	Less than Significant	<i>CEQA Significance:</i> No Impact <i>Comparison to Proposed Project:</i> No Impact	<i>CEQA Significance:</i> Less than Significant <i>Comparison to Proposed Project:</i> Similar Impact
Noise	Less than Significant	<i>CEQA Significance:</i> No Impact <i>Comparison to Proposed Project:</i> No Impact	<i>CEQA Significance:</i> Less than Significant <i>Comparison to Proposed Project:</i> Similar Impact
Public Services	Less than Significant	<i>CEQA Significance:</i> No Impact <i>Comparison to Proposed Project:</i> No Impact	<i>CEQA Significance:</i> Less than Significant <i>Comparison to Proposed Project:</i> Similar Impact
Transportation	Less than Significant	<i>CEQA Significance:</i> No Impact <i>Comparison to Proposed Project:</i> No Impact	<i>CEQA Significance:</i> Less than Significant <i>Comparison to Proposed Project:</i> Similar Impact
Tribal Cultural Resources	Less than Significant with Mitigation	<i>CEQA Significance:</i> No Impact <i>Comparison to Proposed Project:</i> No Impact	<i>CEQA Significance:</i> Less than Significant with Mitigation <i>Comparison to Proposed Project:</i> Less Impact

**Table 7-1. Comparison of Alternative Impacts to Proposed Project**

Environmental Issue Area	Proposed Project	Alternative 1: No Project/No Development	Alternative 2: Reduced Project Site
Utilities/Service Systems	Less than Significant	<i>CEQA Significance:</i> No Impact  <i>Comparison to Proposed Project:</i> No Impact	<i>CEQA Significance:</i> Less than Significant  <i>Comparison to Proposed Project:</i> Less Impact