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:

- Construct and operate a solar energy facility capable of producing up to 80 MW alternating current (AC) of electricity to assist the State of California in achieving its 60 percent renewable portfolio standard by 2030.
- Provide a 160 MW energy (battery storage) system, that would accommodate and store the power generated by the project so that the facility can continue to provide renewable energy during non-daylight hours.

- Help California meet its statutory and regulatory goal of increasing renewable power generation, including greenhouse gas reduction goals of Senate Bill 32.
- Interconnect directly to IID's existing electrical transmission system.
- 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. This alternative would be the most complex, costly, and time-consuming alternative to implement. It is unknown if the environmental impacts associated with this Alternative would be less than the proposed project because it would be speculative to evaluate an unsecured alternate site. This is primarily due to the fact that the proponent does not have control of an alternate site. Therefore, 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 a solar energy project. The No Project/No Development Alternative would fail to meet any of 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 vacant 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. A less than significant aesthetic impact (including potential light and glare impact) has been identified associated with the project. However, because there would be no change to the existing condition of the project site under this alternative, there would be no potential impact associated with a change in visual character of the site and the potential aesthetic impact would be less as compared to the project as the existing visual conditions would not change.

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 3.3, Air Quality, the proposed project would not exceed the ICAPCD's significance thresholds for emissions of ROG, CO, NOx, and $PM_{2.5}$ during both the construction and operational phases of the project. However, the project would exceed the ICAPCD threshold for PM_{10}. Pursuant to ICAPCD, all construction sites, regardless of size, must comply with the requirements contained within Regulation VIII – Fugitive Dust Control Measures. The project must comply with the requirements of ICAPCD Regulation VIII for the control of fugitive dust. However, the project's daily construction emissions would exceed the ICAPCD threshold for PM_{10}, even with implementation of ICAPCD Regulation VIII (Mitigation Measure AQ-1). A predominate source of the project's PM_{10} emissions is workers commuting to and from the project site on unpaved roads. Commuter vehicles traveling over the exposed soils of unpaved roads generates substantial amounts of fugitive PM_{10} emissions. The majority of roadways leading to the project site are paved; however, 1.8 miles of unpaved roadway would be used by commuting workers and vendors. Mitigation Measure AQ-2 is proposed to reduce PM_{10} emissions to levels below the significance threshold. This alternative would result in less 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, bird species, Palm Springs pocket mouse, and riparian habitat/wetlands, this alternative would not result in construction

of a solar facility 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.

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), expansive soils, corrosive soils, soil erosion, and paleontological resources. In contrast, the proposed project would require the incorporation of mitigation measures related to strong ground shaking, expansive soils, corrosive soils, soil erosion, and paleontological resources to minimize impacts to a level less than significant. 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 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. Compared to the proposed project, 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. Therefore, no potential exposure to hazardous materials would occur. Therefore, no impact is identified for this alternative for hazards and hazardous materials. As with the proposed project, this alternative would not result in safety hazards associated with airport operations. Although a less than significant impact is identified for hazards and hazardous materials associated with the project, compared to

the proposed project, this alternative would have less of an impact related to hazards and hazardous materials as there would be no potential for the transport, use, removal or disposal of hazardous materials.

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. The proposed project has the potential to affect surface water quality with polluted runoff flowing from the project to the IID Imperial Valley Drains. To reduce impacts to a less than significant level, the applicant would file an NOI with the SWRCB to comply with the General NPDES Construction Permit and prepare a SWPPP, which addresses the measures that would be included during construction or the project to minimize and control construction and post-construction runoff to the “maximum extent practicable.” Compared to the proposed project, from a drainage perspective, this alternative would avoid changes to existing hydrology and water quality. This alternative would have less of an impact associated with hydrology/water quality as compared to the proposed project.

Land Use Planning

Under the No Project/No Development Alternative, the project site would not be developed and continue to be undeveloped, partially disturbed land. Current land uses would remain the same. No existing community would be divided, and no inconsistencies with land use planning policies would occur. Because no significant Land Use and Planning impact has been identified associated with the proposed project, this alternative would not avoid or reduce a significant impact related to this issue and therefore, it is considered similar to the proposed project.

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 significant noise impacts would occur. As discussed in Section 3.11, 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 have less of an impact associated with noise.

Public Services

Under the No Project/No Development Alternative, the project site would remain vacant and unchanged and would not result in a demand for public services. The proposed project would result in a temporary increase in demand for law enforcement service and would result in a minor increase in demand for fire protection services over existing levels. Therefore, the project applicant would be required to pay the fire protection services’ impact fees and the project applicant will be required to participate in the Imperial County Public Benefit Program to pay for all costs, benefits, and fees associated with the project to offset potential impacts. Compared to the proposed project, this alternative would have less impacts related to public services.

Transportation

There would be no new development under the No Project/No Development Alternative. Therefore, 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, or result in inadequate emergency access. Although the proposed project would result in less than significant transportation impacts, this alternative would avoid an increase in vehicle trips on local roadways, and any safety related hazards that could occur in conjunction with the increase vehicle trips and truck traffic, primarily associated with the construction phase of the project.

Tribal Cultural Resources

The proposed project is not anticipated to cause a substantial adverse change in the significance of a tribal cultural resource. Impacts to tribal cultural resources under the No Project/No Development Alternative are similar to the proposed project.

Utilities and Service Systems

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. The proposed project would not result in any significant impacts to existing utilities or solid waste facilities. Compared to the proposed project, this alternative would have less of an impact related to utilities and 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 any of 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 reduce the size of the solar facility site to minimize impacts on riparian habitat and jurisdictional resources. There is riparian habitat associated with the detention basins within the solar facility site. Additional riparian habitat is associated with the agricultural drains and roadside ditches. Ephemeral drainages are located throughout the northern portion of the solar facility site.

As shown in Figure 7-1, this alternative would avoid development on portions of the solar facility site where riparian habitat and jurisdictional resources occur. The solar facility site would be reduced by approximately 109 acres from a total of 320 acres to 211 acres. Under this alternative, the gen-tie line alignment would be extended approximately 0.54 miles to the south.

7.5.1 Environmental Impact of Alternative 2: Reduced Project Site

Aesthetics

Under Alternative 2, the overall size of the solar energy facility 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 sites, or add a substantial amount of light and glare. As such, this alternative would not avoid or reduce any significant impacts identified for the proposed project and the aesthetic impact would be similar 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. A less than significant impact with mitigation incorporated has been identified for the proposed project during construction. As described in Section 3.3 Air Quality, the proposed project's daily construction emissions would exceed the ICAPCD threshold for PM_{10}, even with implementation of ICAPCD Regulation VIII (Mitigation Measure AQ-1). A predominate source of the project's PM_{10} emissions is workers commuting to and from the project site on unpaved roads. Commuter vehicles traveling over the exposed soils of unpaved roads generates substantial amounts of fugitive PM_{10} emissions. The majority of roadways leading to the project site are paved; however, 1.8 miles of unpaved roadway would be used by commuting workers and vendors. Mitigation Measure AQ-2 is proposed to reduce PM_{10} emissions to levels below the significance threshold. Mitigation Measure AQ-2 would require the project contractor to use soil stabilizers on the 1.8 miles of unpaved roadway used for construction worker access to the project site. Similar to the proposed project, this alternative would be required to comply with the requirements of ICAPCD Regulation VIII (Mitigation Measure AQ-1) for the control of fugitive dust and Mitigation Measure AQ-2 to minimize fugitive PM_{10} emissions.

Similar to the proposed project, this alternative would be consistent with existing AQMPs and would not result in the creation of objectionable odors. This alternative would provide less MW generation compared to the proposed project, thereby reducing its ability to provide a long-term source of renewable energy. Compared to the proposed project, while this alternative would result in less air quality impacts, it would likely provide fewer desirable benefits to overall regional air quality as attributable to the proposed project.

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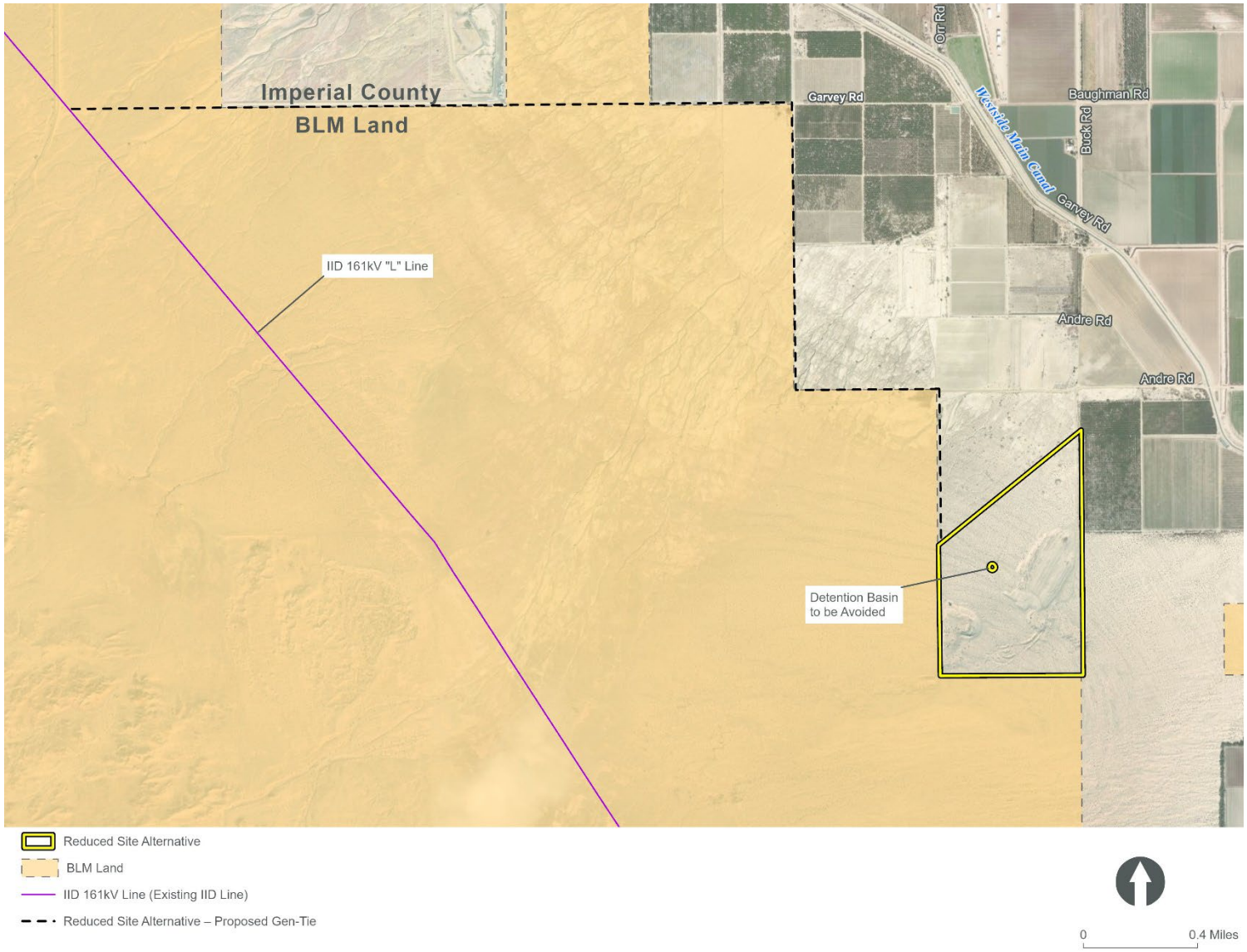
Figure 7-1. Alternative 2 – Reduced Project Site



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Biological Resources

Under Alternative 2, the overall size of the solar energy facility would be reduced by 109 acres. As described in Section 3.4 Biological Resources, there is riparian habitat associated with the detention basins within the solar facility site. Additional riparian habitat is associated with the agricultural drains and roadside ditches. Ephemeral drainages are located throughout the northern portion of the solar facility site. Under Alternative 2, impacts on biological resources would be reduced by reducing the size of the project site to avoid impacts on riparian habitat and jurisdictional resources located within the solar energy facility site. Although the overall size of the solar energy facility would be reduced, there is still potential for impacts on special-status species on the solar energy facility site. Also, the proposed project's potential impacts on biological resources as a result of the construction of the proposed gen-tie line and Ramon Substation would still occur. Compared to the proposed project, this alternative would result in a reduction in impacts on biological resources but would still require mitigation to reduce impacts to a level less than significant.

Cultural Resources

Although the overall size of the solar energy facilities would be reduced by 109 acres, 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. This alternative could avoid direct impacts to potentially significant cultural resources sites potentially located within the reduced project site footprint (yet to be evaluated for eligibility for the CRHR). 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.

Geology and Soils

Under Alternative 2, while the overall project footprint would be reduced, grading and construction of new facilities, such as the solar facility, battery energy storage, and gen-tie, would still occur. Similar to the proposed project, this alternative would also be subject to potential impacts related to strong ground shaking, expansive soils, corrosive soils, 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 by approximately 109 acres, 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 MDAQMD's threshold of 100,000 $MTCO_2e$.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. Because no significant GHG impact

has been identified associated with the proposed project, this alternative would not avoid or reduce a significant impact related to this issue and, therefore, it is considered similar to 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. 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. This alternative would not avoid or lessen the impact to hazards and hazardous materials as no significant impact associated with the proposed project has been identified.

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 project 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. Because no significant noise impact has been identified associated with the proposed project, this alternative would not avoid or reduce a significant impact related to this issue and therefore, it is considered similar to the proposed project.

Public Services

While the overall project footprint would be reduced under this alternative, the impacts of this alternative to public services and associated service ratios would be similar. Similar to the proposed project, this alternative would be conditioned to provide law enforcement and fire service development impact fees. This alternative would result in a similar impact related to public services.

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 project. 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 project has been identified. Impacts to tribal cultural resources under this alternative are similar to the proposed project.

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

Implementation of the Reduced Project Site Alternative would generally result in reduced impacts to air quality, biological resources, cultural resources, hydrology/water quality, and utilities/service systems.

Comparison of the Reduced Project Site Alternative to Project Objectives

Alternative 2 would meet most of the basic objectives of the proposed project and should remain under consideration. However, this alternative would make it more difficult to achieve the overall objective of providing a total of 80 MW of renewable solar energy, as there would be less area available for the placement of PV structures.

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 in 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: air quality, biological resources, cultural resources, hydrology/water quality, 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 and Visual Resources	Less than Significant	*CEQA Significance:* No Impact *Comparison to Proposed Project:* Less Impact	*CEQA Significance:* Less than Significant *Comparison to Proposed Project:* Similar Impact
Air Quality	Less than Significant with Mitigation	*CEQA Significance:* No Impact *Comparison to Proposed Project:* Less Impact	*CEQA Significance:* Less than Significant with Mitigation *Comparison to Proposed Project:* Less Impact
Biological Resources	Less than Significant with Mitigation	*CEQA Significance:* No Impact *Comparison to Proposed Project:* Less Impact (Avoid)	*CEQA Significance:* Less than Significant with Mitigation *Comparison to Proposed Project:* Less Impact
Cultural Resources	Less than Significant with Mitigation	*CEQA Significance:* No Impact *Comparison to Proposed Project:* Less Impact (Avoid)	*CEQA Significance:* Less than Significant with Mitigation *Comparison to Proposed Project:* Less Impact
Geology and Soils	Less than Significant with Mitigation	*CEQA Significance:* No Impact *Comparison to Proposed Project:* Less Impact (Avoid)	*CEQA Significance:* Less than Significant with Mitigation *Comparison to Proposed Project:* Similar Impact

Environmental Issue Area	Proposed Project	Alternative 1: No Project/No Development	Alternative 2: Reduced Project Site
GHG Emissions	Less than Significant	*CEQA Significance:* No Impact *Comparison to Proposed Project:* Less Impact	*CEQA Significance:* Less than Significant *Comparison to Proposed Project:* Similar Impact
Hazards and Hazardous Materials	Less than Significant	*CEQA Significance:* No Impact *Comparison to Proposed Project:* Less Impact	*CEQA Significance:* Less than Significant *Comparison to Proposed Project:* Similar Impact
Hydrology/ Water Quality	Less than Significant with Mitigation	*CEQA Significance:* No Impact *Comparison to Proposed Project:* Less Impact (Avoid)	*CEQA Significance:* Less than Significant with Mitigation *Comparison to Proposed Project:* Less Impact
Land Use/Planning	No Impact	*CEQA Significance:* No Impact *Comparison to Proposed Project:* Similar Impact	*CEQA Significance:* No Impact *Comparison to Proposed Project:* Similar Impact
Noise and Vibration	Less than Significant	*CEQA Significance:* No Impact *Comparison to Proposed Project:* Less Impact	*CEQA Significance:* Less than Significant *Comparison to Proposed Project:* Similar Impact
Public Services	Less than Significant	*CEQA Significance:* No Impact *Comparison to Proposed Project:* Less Impact	*CEQA Significance:* Less than Significant *Comparison to Proposed Project:* Similar Impact

Environmental Issue Area	Proposed Project	Alternative 1: No Project/No Development	Alternative 2: Reduced Project Site
Transportation	Less than Significant	*CEQA Significance:* No Impact *Comparison to Proposed Project:* Less Impact	*CEQA Significance:* Less than Significant *Comparison to Proposed Project:* Similar Impact
Tribal Cultural Resources	Less than Significant	*CEQA Significance:* No Impact *Comparison to Proposed Project:* Less Impact	*CEQA Significance:* Less than Significant *Comparison to Proposed Project:* Similar Impact
Utilities/Service Systems	Less than Significant	*CEQA Significance:* No Impact *Comparison to Proposed Project:* Less Impact	*CEQA Significance:* Less than Significant *Comparison to Proposed Project:* Less Impact

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