
VI. ALTERNATIVES TO THE PROPOSED PROJECT

INTRODUCTION

The purpose of this section is to assess a range of reasonable alternatives to the Project that would feasibly attain most of the basic Project objectives but would avoid or substantially lessen any of the significant impacts of the Project and to evaluate the comparative merits of the alternatives (CEQA Guidelines Section 15126.6). The CEQA Guidelines state that the selection of alternatives should be governed by a “rule of reason.” CEQA also states that, “[t]he EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project.” Generally, significant impacts of an alternative shall be discussed, but in less detail than the project, and should provide decision-makers perspective as well as a reasoned choice.

ASSUMPTIONS AND METHODOLOGY

To develop Project alternatives, the Lead Agency considered the Project objectives and reviewed the significant impacts identified in Section IV of this EIR, considered those significant impacts that could be substantially avoided or reduced through an alternative, and determined the modifications that would be needed (refer to Table VI-1 at the end of this section).

Project Objectives

The objectives of the Project are as follows:

Academic/Interscholastic

1. Preserve and protect the Dominican Sisters’ mission of educating a diverse population of young women, which has extended more than 80 years.
2. Allow FSHA to remain competitive with other comparable educational institutions by offering a physical facility that is able to support the resources necessary to maintain a diverse student body and existing certifications.
3. Allow FSHA students and faculty to participate in interscholastic activities and coordination among area and regional schools

Modernization, Revitalization, Efficiency, and Enhanced Capabilities

4. Create an updated, modernized secondary school campus that provides for the intellectual, physical, social, and spiritual needs of the student body through an integrated and state-of-the-art campus design that meets educational and technological demands for students and visitors.
5. Allow FSHA to participate in the community by permitting events that involve the community while remaining sensitive to the residential character of the surrounding area.

6. Enhance academic learning opportunities by creating additional modernized space for High School education.
7. Enhance student safety through upgraded and modernized infrastructure and service systems.

Athletic

8. Enhance student fitness and athletic opportunities by providing new outdoor athletic facilities that comply with California Interscholastic Federation regulations.
9. Enhance FSHA’s participation in interscholastic athletics by providing new outdoor athletic facilities that comply with California Interscholastic Federation regulation.

Performing Arts and Humanities

10. Enhance Arts and Humanities education by creating additional modernized space for Arts and Humanities education.

Traffic Circulation and Parking

11. Balance the need/provision for physical parking facilities with reasonable operational programs that manage parking and vehicle trips to minimize the effects of campus-related traffic along local residential streets.
12. Establish minimum parking requirements that provide adequate off-street parking for FSHA operations.
13. Encourage carpooling and establish mechanisms to reduce single-occupancy vehicle trips to and from campus.

Site Design and Community

14. Create a physically attractive and historically sensitive school campus that combines old and new architecture and is compatible with the surrounding environment.
15. Improve the functional linkage of campus spaces and provide access throughout while respecting the natural hillside terrain.
16. Locate new classrooms and support facilities proximate to the existing classrooms and core campus facilities.
17. Retain and incorporate the hillside slopes into building design so as to minimize building mass and visible building profile of future structures.

18. Preserve the General Plan's Community Design Element and Land Use Element policies with regard to high design integrity and related concerns by developing permitted institutional uses designed to be sensitive to both the original buildings and the hillside setting.
19. Preserve FSHA's image as a strongly interrelated group of buildings dispersed over a low-density campus and integrated into the large site, so that development would be consistent with the scale of the institution and maintain its harmonious relationship with the nearby residential areas.

Historic Preservation

20. Preserve historically significant structures designed by renowned architect Myron Hunt.

Streamlined Administration and Processing

21. Establish comprehensive long-term planning of the entire FSHA Campus for administration through the City of La Cañada Flintridge and to complete physical buildout of the FSHA Campus Master Plan similar to the vision outlined in the 1994 Conditional Use Permit approval.

Significant Project Impacts

The significant Project impacts that would be less than significant with mitigation include the following:

- Aesthetics – Scenic Vistas/Resources
- Air Quality – Regional and Localized Construction Emissions and Sensitive Receptors
- Biological Resources – Special-Status Species, Riparian Habitat/Sensitive Natural Community, Jurisdictional Wetlands, Wildlife Movement, Trees, and Nesting Birds and Raptor Foraging
- Cultural Resources – Archaeological/Tribal Resources
- Geology and Soils
- Hazards and Hazardous Materials – Impair/Interfere with Emergency Response/Evacuation Plan, Wildland Fires, and Helicopter Operations
- Noise – Construction Noise
- Transportation/Traffic – Construction Traffic

The Project impacts that would remain significant after mitigation include the following:

- Cultural Resources – Historical Resources

ALTERNATIVES CONSIDERED BUT REJECTED

In considering ways to substantially reduce or avoid the significant impacts identified for the Project, several alternatives were considered but rejected for further review, due to the infeasibility of the alternative. These alternatives are discussed below.

No Electricity Service Upgrade Alternative

Implementation of building improvements under the Project would require that the electrical service system on and off of the Project site to be upgraded to accommodate the larger electrical load necessary to operate the pumping system identified under the Fire Flow and Fire Protection Plans (refer to Section III, Project Description), as well as the electrical load necessary to support the proposed new and remodeled building area. To provide adequate electrical serve to the FSHA Campus, Southern California Edison's (SCE) existing 66-kilovolt (kV) sub-transmission line would be modified to include a new 16-kV distribution line measuring approximately 4,000 feet in length. To accommodate the new SCE service line, the existing point of transfer and the 277/280-volt (V) FSHA-owned substation facilities would be modified and relocated. Due to lack of accessibility as a result of topography and vegetation, replacement of up to four of the 66-kV sub-transmission poles would require the use of a helicopter to transport the poles from a staging area to the location of the pole installation. The anticipated staging area would be the Palmerstone Property and the intersection of Inverness Drive and Normandy Drive.

The proposed electricity service upgrade would result primarily in significant (but mitigatable) impacts related to biological resources, hazards and hazardous materials, construction traffic, and construction noise, which would require the need to evacuate all people within 525 feet of the helicopter operations in order to ensure that no significant noise impacts would occur. Under this alternative, this proposed electricity service upgrade would not occur. The purpose of this alternative would be to eliminate the identified significant (but mitigatable) impacts and to eliminate the need for evacuation.

Without the electricity service upgrade, the larger electrical load needed to operate the Fire Flow and Fire Protection Plans and the additional load needed for the new development would not be available, and the remainder of the Project could not be implemented, negating the need for the electricity service upgrade to begin with. Because no aspect of the Project would be implemented under this alternative, none of the Project Objectives would be achieved. As such, this alternative was rejected for further review.

No Parking Facility Alternative

Implementation of the Project includes expansion of the existing High School and Arts Center Buildings. Parking Lot D is located immediately in front of the High School Building and includes 67 parking spaces. Concurrent with the High School Building Expansion, Lot D would be reconfigured to include as few as 16 parking spaces to allow for improved access and vehicle flow through reconfiguring the driveway to accommodate a bus turn-around and a student drop-off/pick-up area. Parking Lot F is located

in front of the existing auditorium and includes 16 parking spaces. Concurrent with the Arts Center Building expansion, Lot F would be removed entirely. Due to the loss of these parking spaces, additional parking needs associated with increased development, and a desire for more centralized parking on the school campus, the Project includes development of a 99,000-square-foot Parking Facility with 239 parking spaces at the location of existing Parking Lot C (which currently includes 73 parking spaces).

Implementation of the proposed Parking Facility would result primarily in significant (but mitigatable) impacts related to biological resources (trees), hazards and hazardous materials (impair/interfere with emergency response/evacuation plan), transportation/traffic (construction traffic), and would result in significant and unavoidable impacts related to historical resources, due to the loss of the Tennis Shelter. Under this alternative, the Parking Facility would not be developed. The purpose of this alternative would be to eliminate the identified significant (but mitigatable) and significant and unavoidable impacts.

Without the Parking Facility, the amount of parking available at the school campus would be insufficient to accommodate future parking requirements associated with the High School and Arts Center Buildings expansion. Without sufficient parking, the City would not permit the proposed expansion, negating the need for the Parking Facility to begin with. Because essential components of the Project would not be implemented under this alternative, most of the Project Objectives would not be achieved. As such, this alternative was rejected for further review.

SELECTED ALTERNATIVES

The alternatives analyzed in this EIR include the following:

Alternative A: No Project (Continuation of Existing Project Site Conditions)

Alternative B: No High School Building Expansion

Alternative C: No Arts Center Building Expansion

A more detailed discussion of these alternatives and impacts that would occur under the alternatives is included below.

ALTERNATIVE A: NO PROJECT (CONTINUATION OF EXISTING PROJECT SITE CONDITIONS)

CEQA requires the alternatives analysis to include a “no project” alternative, which is the circumstance under which the Project does not proceed. The purpose of analyzing a No Project Alternative is to allow decision makers to compare the impacts of approving the project with the impacts of not approving the project (CEQA Guidelines Section 15126.6[e][1]). Pursuant to CEQA Guidelines Section 15126.6(e)(2), requirements of the analysis of the “no project” alternative are as follows:

The “no project” analysis shall discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time the environmental analysis is commenced, as well as what would reasonably be expected to occur in the foreseeable future if the proposed project were not approved, based on current plans, and consistent with available infrastructure and community services.

At the time the notice of preparation (NOP) was published for the Project, there was no evidence that another development at the Project site would be forthcoming in the event the Project is not approved. Thus, for the purposes of this EIR, Alternative A: No Project (Continuation of Existing Project Site Conditions) (herein referred to as “Alternative A”) assumes that the Project site would remain in its current condition. Although no new development would occur on the Project site under Alternative A, this alternative assumes the development of the related projects in the area of the Project site. The potential environmental impacts associated with Alternative A are described below and are compared to the environmental impacts associated with the Project (also refer to Table VI-1 at the end of this section). No discretionary actions would be required by local, state, or federal agencies for this alternative.

ALTERNATIVE B: NO HIGH SCHOOL BUILDING EXPANSION

Alternative B: No High School Building Expansion (herein referred to “Alternative B”) assumes implementation of the Project as described in Section III (Project Description) with the exception of the proposed expansion of the High School Building. Under Alternative B, the High School Building would not be expanded by 13,482 square feet, and the 67-space parking lot in front of the building would remain.

ALTERNATIVE C: NO ARTS CENTER BUILDING EXPANSION

Alternative C: No Arts Center Building Expansion (herein referred to “Alternative C”) assumes implementation of the Project as described in Section III (Project Description) with the exception of the proposed expansion of the Arts Center Building. Under Alternative C, the Arts Center Building would not be expanded by 8,649 square feet, and the 16-space parking lot in front of the existing auditorium would remain.

Aesthetics

Scenic Vistas/Resources

Project

As discussed in Section IV.B (Aesthetics) of the Draft EIR, due to intervening topography, landscaping, and existing development, many of the proposed changes to the FSHA campus would not be visible from any of the City-designated scenic corridors. Additionally, the heights of the proposed new structures, including the parking structure and expansion of the Arts Center and High School Buildings, would not

exceed existing building heights on the FSHA campus and as such, would not interfere with any scenic vistas available from the Project site area.

Scenic resources at the Project site, including open space and the historic Administration Building, would not be affected by the Project; these resources would remain untouched. As discussed in Section IV.D (Biological Resources), a total of 10 coast live oak trees and 6 California sycamore trees with a diameter-at-breast-height greater than 12 inches would be removed as part of the Project. However, the Project Applicant would be required to replace these trees in accordance with Mitigation Measure D-6, which would ensure that Project impacts related to tree removal would be less than significant. For the reasons stated above, Project impacts related to scenic vistas/resources would be less than significant.

Alternative A

Alternative A includes continuation of the existing conditions at the school campus; no new development would occur. As such, this alternative would avoid the less than significant (with mitigation) impact related to scenic vistas/resources that would occur under the Project.

Alternative B

Alternative B includes implementation of the Project with the exception of the 13,482-square-foot expansion of the High School Building, which would not occur under this alternative. Because this alternative includes less development than under the Project, Alternative B would not interfere with any scenic vistas. This alternative would require the removal of a total of 10 coast live oak trees and 6 California sycamore trees with a diameter-at-breast-height greater than 12 inches. Mitigation Measure D-6 identified for the Project also would apply to Alternative B. Therefore, impacts related to scenic vistas/resources under Alternative B would be less than significant with mitigation, similar to the Project.

Alternative C

Alternative C includes implementation of the Project with the exception of the 8,679-square-foot expansion of the Arts Center Building, which would not occur under this alternative. Because this alternative includes less development than under the Project, Alternative C would not interfere with any scenic vistas. This alternative would require the removal of a total of 10 coast live oak trees and 6 California sycamore trees with a diameter-at-breast-height greater than 12 inches, similar to the Project. Mitigation Measure D-6 identified for the Project also would apply to Alternative C. Therefore, impacts related to scenic vistas/resources under Alternative C would be less than significant with mitigation, similar to the Project.

Visual Character

Project

As discussed in Section IV.B (Aesthetics) of the Draft EIR, the existing visual character of the Project site is that of a school. The Project is a 15-year Land Use Concept for improvement and modernization of the FSHA Campus as a whole. The Project would not alter the school character of the Project site. Additionally, the school has been operation at the Project site since 1931; the visual character of the school has been part of the surrounding area as residential development has occurred around the school. For this reason, the Project would not alter the visual character of the surrounding area. Therefore, Project impacts related to visual character would be less than significant.

Alternative A

Alternative A includes continuation of the existing conditions at the school campus; no new development would occur. As such, this alternative would avoid the less than significant impact related to visual character that would occur under the Project.

Alternative B

Alternative B includes implementation of the Project with the exception of the 13,482-square-foot expansion of the High School Building, which would not occur under this alternative. The school campus would retain its visual character as a school under Alternative B, and impacts related to visual character would be less than significant, similar to the Project.

Alternative C

Alternative C includes implementation of the Project with the exception of the 8,679-square-foot expansion of the Arts Center Building, which would not occur under this alternative. The school campus would retain its visual character as a school under Alternative C, and impacts related to visual character would be less than significant, similar to the Project.

Light and Glare

Project

As discussed in Section IV.B (Aesthetics) of the Draft EIR, the Project would include new sources of light and glare. However, compliance with LCF's Municipal Code standards related to lighting would ensure that the Project would not generate a substantial light or glare which would adversely affect day or nighttime views in the area. Therefore, Project impacts related to light and glare would be less than significant.

Alternative A

Alternative A includes continuation of the existing conditions at the school campus; no new development would occur. As such, this alternative would avoid the less than significant impact related to light and glare that would occur under the Project.

Alternative B

Alternative B includes implementation of the Project with the exception of the 13,482-square-foot expansion of the High School Building, which would not occur under this alternative. Alternative B would include additional sources of light and glare, but slightly less than the Project, due to the reduced square footage. Therefore, impacts related to light and glare under Alternative B would be less than significant, similar to the Project.

Alternative C

Alternative C includes implementation of the Project with the exception of the 8,679-square-foot expansion of the Arts Center Building, which would not occur under this alternative. Alternative C would include additional sources of light and glare, but slightly less than the Project, due to the reduced square footage. Therefore, impacts related to light and glare under Alternative C would be less than significant, similar to the Project.

Air Quality

Consistency with Air Quality Management Plan

Project

As discussed in Section IV.C (Air Quality) of the Draft EIR, the Project does not include an increase in student enrollment or the number of faculty at the school. As such, the Project would not generate population growth in the Project area that has not been accounted for in the Air Quality Management Plan (AQMP). Thus, the Project would not conflict with the AQMP. Therefore, Project impacts related to consistency with the AQMP would be less than significant.

Alternative A

Alternative A includes continuation of the existing conditions at the school campus; no new development would occur. As such, this alternative would also result in a less than significant impact related to consistency with the AQMP, similar to the Project.

Alternative B

Alternative B includes implementation of the Project with the exception of the 13,482-square-foot expansion of the High School Building, which would not occur under this alternative. Similar to the Project, Alternative B does not include an increase in the student enrollment or the number of faculty at the school, and would not generate population growth. Alternative B would be consistent with the AQMP. Therefore, impacts under Alternative B related to consistency with the AQMP would be less than significant, similar to the Project.

Alternative C

Alternative C includes implementation of the Project with the exception of the 8,679-square-foot expansion of the Arts Center Building, which would not occur under this alternative. Similar to the Project, Alternative C does not include an increase in the student enrollment or the number of faculty at the school, and would not generate population growth. Alternative C would be consistent with the AQMP. Therefore, impacts under Alternative C related to consistency with the AQMP would be less than significant, similar to the Project.

Construction Emissions

Project

As discussed in Section IV.C (Air Quality) of the Draft EIR, the Project's construction-related regional NO_x emissions and localized PM₁₀ and PM_{2.5} emissions would exceed the South Coast Air Quality Management District's (SCAQMD) significance thresholds and as such, without mitigation, the Project's construction-related regional and localized emissions (and sensitive receptors) would be significant. However, implementation of Mitigation Measures C-1 through C-3 would reduce these emissions to below the threshold, ensuring that the impact would be less than significant.

Alternative A

Alternative A includes continuation of the existing conditions at the school campus; no new development would occur. As such, this alternative would avoid the less than significant (with mitigation) impact related to construction emissions that would occur under the Project.

Alternative B

Alternative B includes implementation of the Project with the exception of the 13,482-square-foot expansion of the High School Building, which would not occur under this alternative. The significant (but mitigatable) impact associated with the construction-related regional NO_x emissions and localized PM₁₀ and PM_{2.5} emissions identified for the Project also would occur under Alternative B, because this impact is associated with construction activities (refer to Table IV.C-6 in Section IV.C, Air Quality) that would

occur in Phase 1 (primarily Phase 1A associated with the grading for the fire protection plan), which would occur under Alternative B. Mitigation Measures C-1 through C-3 also would apply to Alternative B. Similar to the Project, with implementation of mitigation, impacts related to construction emissions under Alternative B would be less than significant.

Alternative C

Alternative C includes implementation of the Project with the exception of the 8,679-square-foot expansion of the Arts Center Building, which would not occur under this alternative. The significant (but mitigatable) impact associated with the construction-related regional NO_x emissions and localized PM₁₀ and PM_{2.5} emissions identified for the Project also would occur under Alternative C, because this impact is associated with construction activities (refer to Table IV.C-6 in Section IV.C, Air Quality) that would occur in Phase 1 (primarily Phase 1A associated with the grading for the fire protection plan), which would occur under Alternative C. Mitigation Measures C-1 through C-3 also would apply to Alternative C. Similar to the Project, with implementation of mitigation, impacts related to construction emissions under Alternative C would be less than significant.

Operational Emissions

Project

As discussed in Section IV.C (Air Quality) of the Draft EIR, operational activities would not produce pollutant emissions in excess of SCAQMD's significance thresholds, and the Project's operation-related emissions would be less than significant.

Alternative A

Alternative A includes continuation of the existing conditions at the school campus; no new development would occur. As such, this alternative would avoid the less than significant impact related to operational emissions that would occur under the Project.

Alternative B

Alternative B includes implementation of the Project with the exception of the 13,482-square-foot expansion of the High School Building, which would not occur under this alternative. Because Alternative B includes less development than under the Project and does not include an increase in student enrollment or the number of faculty at the school, operational emissions impacts under this alternative would be less than significant, similar to the Project.

Alternative C

Alternative C includes implementation of the Project with the exception of the 8,679-square-foot expansion of the Arts Center Building, which would not occur under this alternative. Because Alternative C includes less development than under the Project and does not include an increase in student enrollment or the number of faculty at the school, operational emissions impacts under this alternative would be less than significant, similar to the Project.

Biological Resources

Special-Status Species

Project

As discussed in Section IV.D (Biological Resources) of the Draft EIR, during the Project's construction phase, potentially significant impacts least Bell's vireo, pallid bat, and San Diego Desert woodrat) could occur. However, implementation of Mitigation Measures D-1 through D-3 would ensure that Project impacts related to these species would be less than significant.

Alternative A

Alternative A includes continuation of the existing conditions at the school campus; no new development would occur. As such, this alternative would avoid the less than significant (with mitigation) impact related to special-status species that would occur under the Project.

Alternative B

Alternative B includes implementation of the Project with the exception of the 13,482-square-foot expansion of the High School Building, which would not occur under this alternative. The significant special-status species impact would occur as a result of the proposed electricity service upgrade, which would occur under Alternative B. Mitigation Measures D-1 through D-3 would apply to Alternative B and would ensure that impacts related to special-status species would be less than significant, similar to the Project.

Alternative C

Alternative C includes implementation of the Project with the exception of the 8,679-square-foot expansion of the Arts Center Building, which would not occur under this alternative. The significant special-status species impact would occur as a result of the proposed electricity service upgrade, which would occur under Alternative C. Mitigation Measures D-1 through D-3 would apply to Alternative C and would ensure that impacts related to special-status species would be less than significant, similar to the Project.

Riparian Habitat/Sensitive Natural CommunityProject

As discussed in Section IV.D (Biological Resources) of the Draft EIR, the Project would not significantly impact any riparian habitat/sensitive natural community.

Alternative A

Alternative A includes continuation of the existing conditions at the school campus; no new development would occur. No significant impacts related to riparian habitat/sensitive natural community would occur under this alternative, similar to the Project.

Alternative B

Alternative B includes implementation of the Project with the exception of the 13,482-square-foot expansion of the High School Building, which would not occur under this alternative. This alternative would not include any development outside of the Project's development footprint. As such, impacts related to riparian habitat/sensitive natural community would be less than significant, similar to the Project.

Alternative C

Alternative C includes implementation of the Project with the exception of the 8,679-square-foot expansion of the Arts Center Building, which would not occur under this alternative. This alternative would not include any development outside of the Project's development footprint. As such, impacts related to riparian habitat/sensitive natural community would be less than significant, similar to the Project.

Jurisdictional WetlandsProject

As discussed in Section IV.D (Biological Resources) of the Draft EIR, during the Project's construction phase, potentially significant impacts to jurisdictional wetlands could occur. However, implementation of Mitigation Measure D-4 would ensure that Project impacts related to jurisdictional wetlands would be less than significant.

Alternative A

Alternative A includes continuation of the existing conditions at the school campus; no new development would occur. As such, this alternative would avoid the less than significant (with mitigation) impact related to jurisdictional wetlands that would occur under the Project.

Alternative B

Alternative B includes implementation of the Project with the exception of the 13,482-square-foot expansion of the High School Building, which would not occur under this alternative. The significant jurisdictional wetland impact would occur as a result of the proposed electricity service upgrade, which would occur under Alternative B. Mitigation Measure D-4 would apply to Alternative B and would ensure that impacts related to jurisdictional wetlands would be less than significant, similar to the Project.

Alternative C

Alternative C includes implementation of the Project with the exception of the 8,679-square-foot expansion of the Arts Center Building, which would not occur under this alternative. The significant jurisdictional wetland impact would occur as a result of the proposed electricity service upgrade, which would occur under Alternative C. Mitigation Measure D-4 would apply to Alternative C and would ensure that impacts related to jurisdictional wetlands would be less than significant, similar to the Project.

Wildlife Movement

Project

As discussed in Section IV.D (Biological Resources) of the Draft EIR, the study area provides some wildlife habitat movement opportunities, particularly in the southwestern portion of the area. Although the study area is relatively developed with an existing school and residential development, wildlife may be utilizing these areas for movement. Short-term construction activities associated with the Project could temporarily disturb wildlife movement. However, with implementation of Mitigation Measure D-5, Project impacts related to wildlife movement would be less than significant.

Alternative A

Alternative A includes continuation of the existing conditions at the school campus; no new development would occur. As such, this alternative would avoid the less than significant (with mitigation) impact related to wildlife movement that would occur under the Project.

Alternative B

Alternative B includes implementation of the Project with the exception of the 13,482-square-foot expansion of the High School Building, which would not occur under this alternative. The significant wildlife movement impact would occur as a result of the proposed electricity service upgrade, which would occur under Alternative B. Mitigation Measure D-5 would apply to Alternative B and would ensure that impacts related to wildlife movement would be less than significant, similar to the Project.

Alternative C

Alternative C includes implementation of the Project with the exception of the 8,679-square-foot expansion of the Arts Center Building, which would not occur under this alternative. The significant wildlife movement impact would occur as a result of the proposed electricity service upgrade, which would occur under Alternative C. Mitigation Measure D-5 would apply to Alternative C and would ensure that impacts related to wildlife movement would be less than significant, similar to the Project.

Trees

Project

As discussed in Section IV.D (Biological Resources) of the Draft EIR, according to the tree report, a total of 10 coast live oak trees and 6 California sycamore trees with a DBH greater than 12 inches would be removed with Project implementation. Furthermore, additional protected trees may be removed in association with sub-transmission pole replacement, installation, and removal. However, with implementation of Mitigation Measure D-6, Project impacts related to trees would be less than significant.

Alternative A

Alternative A includes continuation of the existing conditions at the school campus; no new development would occur. As such, this alternative would avoid the less than significant (with mitigation) impact related to trees that would occur under the Project.

Alternative B

Alternative B includes implementation of the Project with the exception of the 13,482-square-foot expansion of the High School Building, which would not occur under this alternative. The significant tree impact would occur primarily as a result of the proposed Parking Facility, which would be developed under Alternative B. Mitigation Measure D-6 would apply to Alternative B and would ensure that impacts related to trees would be less than significant, similar to the Project.

Alternative C

Alternative C includes implementation of the Project with the exception of the 8,679-square-foot expansion of the Arts Center Building, which would not occur under this alternative. The significant tree impact would occur primarily as a result of the proposed Parking Facility, which would be developed under Alternative C. Mitigation Measure D-6 would apply to Alternative C and would ensure that impacts related to trees would be less than significant, similar to the Project.

Nesting Birds and Raptor Foraging

Project

As discussed in Section IV.D (Biological Resources) of the Draft EIR, there is high potential for nesting birds to occur throughout the study area. The removal of vegetation may directly impact birds and bird nests, which would trigger the MBTA and similar provisions under Fish and Game Code as well as be a potentially significant impact to native birds under CEQA. Several raptor species may use the site or nearby trees for nesting or foraging. The removal of these trees may adversely affect nesting raptors. However, with implementation of Mitigation Measure D-7, Project impacts related to nesting birds and raptor foraging would be less than significant.

Alternative A

Alternative A includes continuation of the existing conditions at the school campus; no new development would occur. As such, this alternative would avoid the less than significant (with mitigation) impact related to nesting birds and raptor foraging that would occur under the Project.

Alternative B

Alternative B includes implementation of the Project with the exception of the 13,482-square-foot expansion of the High School Building, which would not occur under this alternative. The significant nesting birds and raptor foraging impact would occur as a result of the electricity service upgrade and the tree removal associated with the proposed Parking Facility, which would be developed under Alternative B. Mitigation Measure D-7 would apply to Alternative B and would ensure that impacts related to nesting birds and raptor foraging would be less than significant, similar to the Project.

Alternative C

Alternative C includes implementation of the Project with the exception of the 8,679-square-foot expansion of the Arts Center Building, which would not occur under this alternative. The significant nesting birds and raptor foraging impact would occur as a result of the electricity service upgrade and the tree removal associated with the proposed Parking Facility, which would be developed under Alternative C. Mitigation Measure D-7 would apply to Alternative C and would ensure that impacts related to nesting birds and raptor foraging would be less than significant, similar to the Project.

Cultural Resources

Historical Resources

Project

As discussed in Section IV.E (Cultural Resources) of the Draft EIR, the following physical changes to the historical resource, Flintridge Biltmore Hotel Historic District, and its immediate surroundings would occur as a result of the Project:

1. Cottages 1 and 2, the largest of the five cottages, and the tennis shelter building, all contributing features of the historic district, would be demolished.
2. The parking structure would change the setting of the historic district by introducing a physical and visual obstruction that blocks views between the Administration Building and the cottages. This would change the relationship of the contributing features of the historic district and diminish the district's ability to convey its significance as an architecturally unified complex.
3. In addition, portions of the expanded Arts Center Building would encroach into the historic district boundary to the northwest of Cottage 3, which would alter further the immediate surroundings of the historic district and change the physical relationship between the cottages, which are contributing elements of the historic district.

Although not designed by Myron Hunt, who was important to the architectural and cultural development of Southern California, the cottages were constructed concurrently with the hotel building and were an integral part of the complex. The inclusion of cottages with the primary building in the hotel's plan is consistent with the plans of other significant hotels of the day, including the Huntington Hotel, which was also designed by Myron Hunt.

Although the historic district suffered the loss of the original music pavilion (by fire) and tennis courts (converted to a parking lot), the hotel building, all original cottages, and landscape features—including the bridle trails, walking paths, rock walls, and walkway lights—remain intact. The district as a whole retains its integrity. The removal of the cottages and tennis shelter building and introduction of a new 3-story parking structure within the historic district between the cottages and the Administration Building would result in a loss of design, feeling, association, and materials. However, the Historic District would retain sufficient integrity to remain eligible for the California Register. Nonetheless, Project impacts related to the contributing features would be significant.

Implementation of Mitigation Measures E-1 and E-2 would not reduce the Project's significant impact to historical resources to less than significant, and the impact would remain significant and unavoidable.

Alternative A

Alternative A includes continuation of the existing conditions at the school campus; no new development would occur. As such, this alternative would avoid the significant and unavoidable impact related to historical resources that would occur under the Project.

Alternative B

Alternative B includes implementation of the Project with the exception of the 13,482-square-foot expansion of the High School Building, which would not occur under this alternative. All of the physical changes to the historical resource described above would occur under Alternative B. As a result, impacts related to historical resources would be significant and unavoidable after implementation of Mitigation Measures E-1 and E-2, similar to the Project.

Alternative C

Alternative C includes implementation of the Project with the exception of the 8,679-square-foot expansion of the Arts Center Building, which would not occur under this alternative. Most of the physical changes to the historical resource described above would occur under Alternative C, with the exception of the expanded Arts Center Building encroaching to the historic district boundary to the northwest of Cottage 3. However, this exception would not eliminate the impact on the historical resource. As a result, impacts related to historical resources would be significant and unavoidable after implementation of Mitigation Measures E-1 and E-2, similar to the Project.

Archaeological/Tribal Resources

Project

As discussed in Section IV.E (Cultural Resources) of the Draft EIR, no archaeological resources are known to occur within the Project site. Because of the setting of the campus (i.e., on steep slopes) and the shallow bedrock, there is a low likelihood for encountering buried archaeological resources during construction activities, although not out of the realm of possibility, given the high archaeological resource sensitivity of the area. As such, it is possible that unknown archaeological resources could be encountered and damaged/destroyed during ground-disturbing activities associated with the Project. However, implementation of Mitigation Measures E-3 and E-4 would ensure that Project impacts related to archaeological/tribal resources would be less than significant.

Alternative A

Alternative A includes continuation of the existing conditions at the school campus; no new development would occur. As such, this alternative would avoid the less than significant (with mitigation) impact related to archaeological/tribal resources that would occur under the Project.

Alternative B

Alternative B includes implementation of the Project with the exception of the 13,482-square-foot expansion of the High School Building, which would not occur under this alternative. Alternative B would include ground-disturbing activities, including grading and excavation, and would have the potential to encounter unknown archaeological/tribal resources. Mitigation Measures E-3 and E-4 also would apply to Alternative B to ensure that impacts related to archaeological/tribal resources would be less than significant, similar to the Project.

Alternative C

Alternative C includes implementation of the Project with the exception of the 8,679-square-foot expansion of the Arts Center Building, which would not occur under this alternative. Alternative C would include ground-disturbing activities, including grading and excavation, and would have the potential to encounter unknown archaeological/tribal resources. Mitigation Measures E-3 and E-4 also would apply to Alternative C to ensure that impacts related to archaeological/tribal resources would be less than significant, similar to the Project.

Paleontological Resources

Project

As discussed in Section IV.E (Cultural Resources) of the Draft EIR, the FSHA campus is underlain by Mesozoic-era quartz diorite, which was uplifted by thrust faults to form the San Rafael Hills, part of the Transverse Ranges of Southern California. Quartz diorite is a plutonic igneous rock that has no potential to contain fossil resources. Additionally, the Project site does not contain any unique geologic features. Thus, the Project would not directly or indirectly destroy unique paleontological resources or unique geologic feature. Therefore, Project impacts related to paleontological resources would be less than significant.

Alternative A

Alternative A includes continuation of the existing conditions at the school campus; no new development would occur. As such, this alternative would avoid the less than significant impact related to paleontological resources that would occur under the Project.

Alternative B

Alternative B includes implementation of the Project with the exception of the 13,482-square-foot expansion of the High School Building, which would not occur under this alternative. Because the Project site does not contain any fossil resources or unique geologic features, no amount of development on the Project site would result in significant impacts related to paleontological resources.

Alternative C

Alternative C includes implementation of the Project with the exception of the 8,679-square-foot expansion of the Arts Center Building, which would not occur under this alternative. Because the Project site does not contain any fossil resources or unique geologic features, no amount of development on the Project site would result in significant impacts related to paleontological resources.

Geology and Soils

Project

As discussed in Section IV.F (Geology and Soils) of the Draft EIR, the Project site is in a seismically active region and is susceptible to ground motion as a result of potential movement along faults in the region. Seismic activity in the region is an existing condition. CEQA does not require that lead agencies study the impact of the existing environment upon the proposed project or its future occupants.¹ Nevertheless, CEQA does require study of the potential impacts of grading, excavation, and structures proposed as part of a project, including the potential impacts of these activities during seismic events. All new development associated with the Project would be required by the City to be designed and constructed in conformance to the most recently adopted City Building Code design parameters. Additionally, the City would require the Project Applicant to prepare a Geotechnical Report that would address the specific building standards and recommendations that shall apply to building on the Project site (refer to Mitigation Measure F-1). Through compliance with the City's building code and recommendations of a Geotechnical Report, impacts related to seismic ground shaking would be less than significant.

Alternative A

Alternative A includes continuation of the existing conditions at the school campus; no new development would occur. As such, this alternative would avoid the less than significant impact related to geology and soils that would occur under the Project.

Alternative B

Alternative B includes implementation of the Project with the exception of the 13,482-square-foot expansion of the High School Building, which would not occur under this alternative. Because the Project site is the same under the Project as it is for Alternative B, any development of the Project site would be subject to the same geotechnical issues identified for the Project and would be subject to the most recently

¹ [*California Building Industry Association v. Bay Area Air Quality Management District* \(2015\) __ Cal.4th __ \(Case No. S213478\).](#)

adopted City Building Code design parameters to ensure that impacts related to geology and soils would be less than significant.

Alternative C

Alternative C includes implementation of the Project with the exception of the 8,679-square-foot expansion of the Arts Center Building, which would not occur under this alternative. Because the Project site is the same under the Project as it is for Alternative B, any development of the Project site would be subject to the same geotechnical issues identified for the Project and would be subject to the most recently adopted City Building Code design parameters to ensure that impacts related to geology and soils would be less than significant.

Greenhouse Gas Emissions

Project

As discussed in Section IV.G (Greenhouse Gas Emissions) of the Draft EIR, the Project contains numerous regulatory compliance measures and project design features that would reduce the Project's greenhouse gas (GHG) emissions profile and would represent improvements vis-à-vis the "no-action-taken" (NAT) scenario. As a result of this and the analysis of net emissions, the Project's contribution to global climate change is not "cumulatively considerable," and impacts would be less than significant.

Alternative A

Alternative A includes continuation of the existing conditions at the school campus; no new development would occur. As such, this alternative would avoid the less than significant impact related to GHG emissions that would occur under the Project.

Alternative B

Alternative B includes implementation of the Project with the exception of the 13,482-square-foot expansion of the High School Building, which would not occur under this alternative. Because Alternative B includes similar but slightly less development than under the Project, GHG emissions would be similar to those identified for the Project, and impacts related to GHG emissions would be less than significant.

Alternative C

Alternative C includes implementation of the Project with the exception of the 8,679-square-foot expansion of the Arts Center Building, which would not occur under this alternative. Because Alternative C includes similar but slightly less development than under the Project, GHG emissions would be

somewhat similar to those identified for the Project, and impacts related to GHG emissions would be less than significant.

Hazards and Hazardous Materials

Impair/Interfere with Emergency Response/Evacuation Plan

Project

As discussed in Section IV.H (Hazards and Hazardous Materials) of the Draft EIR, during the construction phases for the development projects under the Specific Plan, temporary partial lane closures could occur to allow for the delivery of materials and the movement of haul trucks, which could potentially affect emergency response. However, the Project includes a Construction Management Plan (refer to Mitigation Measure M-1), implementation of which would ensure that impacts related to this issue would be less than significant.

Alternative A

Alternative A includes continuation of the existing conditions at the school campus; no new development would occur. As such, this alternative would avoid the less than significant (with mitigation) impact related to impair/interfere with an emergency response/evacuation plan that would occur under the Project.

Alternative B

Alternative B includes implementation of the Project with the exception of the 13,482-square-foot expansion of the High School Building, which would not occur under this alternative. Although Alternative B includes development of slightly less development than the Project, this alternative could result in impacts related to impair/interfere with an emergency response/evacuation plan. Mitigation Measure M-1 also would apply to Alternative B to ensure that impacts related to this issue would be less than significant, similar to the Project.

Alternative C

Alternative C includes implementation of the Project with the exception of the 8,679-square-foot expansion of the Arts Center Building, which would not occur under this alternative. Although Alternative C includes development of slightly less development than the Project, this alternative could result in impacts related to impair/interfere with an emergency response/evacuation plan. Mitigation Measure M-1 also would apply to Alternative C to ensure that impacts related to this issue would be less than significant, similar to the Project.

Wildland Fires

Project

As discussed in Section IV.H (Hazards and Hazardous Materials) of the Draft EIR, implementation of the FSHA Specific Plan would require the fire service within the FSHA Campus to be upgraded. This includes the addition of several on-site fire hydrants within the FSHA Campus grounds. To meet the Los Angeles County Fire Department required fire flow and water pressure for the new on-site hydrants, the existing fire service would be upgraded. The Conceptual Landscape Plan incorporates a plant palette of drought-tolerant and native species that serve to reduce water use and serve as a sufficient buffer between FSHA Campus development areas and surrounding native vegetation and brush. As required, the Landscape Plan and ongoing maintenance and operation of the FSHA Campus would be in compliance with the “Fuel Modification Plan Guidelines,” published by the County of Los Angeles Fire Department. To ensure compliance with existing and continued fuel modification and setback planning requirements, the draft landscape plan prepared for each major FSHA Campus improvement would be reviewed and approved by the Los Angeles County Fire Department (refer to Mitigation Measure H-2). With implementation of Mitigation Measure H-2, Project impacts related to wildland fires would be less than significant.

Alternative A

Alternative A includes continuation of the existing conditions at the school campus; no new development would occur. As such, this alternative would avoid the less than significant (with mitigation) impact related to wildland fires that would occur under the Project.

Alternative B

Alternative B includes implementation of the Project with the exception of the 13,482-square-foot expansion of the High School Building, which would not occur under this alternative. Although Alternative B includes development of slightly less development than the Project, this alternative also would require upgrade to the fire service within the FSHA Campus grounds and would be required to comply with fuel modification requirements. Mitigation Measure H-2 also would apply to Alternative B to ensure that impacts related to wildland fires would be less than significant, similar to the Project.

Alternative C

Alternative C includes implementation of the Project with the exception of the 8,679-square-foot expansion of the Arts Center Building, which would not occur under this alternative. Although Alternative C includes development of slightly less development than the Project, this alternative also would require upgrade to the fire service within the FSHA Campus grounds and would be required to comply with fuel modification requirements. Mitigation Measure H-2 also would apply to Alternative C to ensure that impacts related to wildland fires would be less than significant, similar to the Project.

Helicopter Operations

Project

As discussed in Section IV.H (Hazards and Hazardous Materials) of the Draft EIR, prior to implementation of the Specific Plan development projects, SCE's existing 66-kilovolt (kV) sub-transmission line would be modified to include a new 16-kV distribution line measuring approximately 4,000 feet in length. To accommodate the new SCE service line, the existing point of transfer and the 277/280-V FSHA-owned substation facilities would be modified and relocated. Due to lack of accessibility as a result of topography and vegetation, replacement of up to four of the 66-kV sub-transmission poles would require the use of a helicopter to transport the poles from a staging area to the location of the pole installation. The anticipated staging areas would be the Palmerstone Property and the intersection of Inverness Drive and St. Katherine Drive. Once the area for the pole installation has been prepped, a helicopter would fly from its station of origin to the staging area, where the pole would be attached to lines and would be carried by the helicopter to the location of pole installation.

It is a Federal Aviation Administration (FAA) regulation for helicopters conducting external load operations in populated/developed areas to submit a Congested Area Plan to the FAA and obtain approval prior to any work with helicopters begin. Generally, the FAA requires five working days advanced notice for the CAP. The CAP is developed by the owner/operator of the helicopter conducting the work. FAA regulations require the helicopter owner/operator to secure the Operational Area, which is an area unoccupied on the surface by the nonparticipating public. The Operational Area is not part of the operation, but persons within this area could sustain injuries, or property could sustain damage, by the external load or by the attaching means (load, cables, hooks, etc.). The Operational Area is defined by using the length of the longline suspended under the helicopter, plus any rigging, plus the length of the load itself (i.e., 100-foot longline + 10-foot rigging + 75-foot pole = 185-foot minimum distance laterally from the helicopter from pick up location to set location). SCE Aircraft Operations tries to adhere to a 300-foot Operational Area for company owned helicopters during external load operations. Contract helicopter companies shall determine their own distance requirements based on the equipment they decide to use for the Project that could exceed 300 feet. Structures are required to be unoccupied, if the required distances cannot be maintained during the flight. If any poles are located within the minimum lateral distance of homes, it is anticipated that flight paths for the pole replacement would require residents to temporarily vacate their homes during flight operations. Pole 3, located northwest of the termination of Normandy Court) is located within 300 lateral feet of 22 Normandy Court and 211 Inverness drive). Pole 4, located northeast of the intersection of Inverness Drive and St. Katherine Drive, is located within 300 lateral feet of 211 and 244 Inverness Drive. Pole 9, located south of 312 Inverness Drive, is located within 300 lateral feet of 206, 250, 300, 309, 312, and 321 Inverness Drive. Thus, SCE would coordinate with potentially affected residents to minimize the duration of the necessary work and any resulting inconvenience. With implementation of the Congested Area Plan (Mitigation Measure H-3), risks to people living in the vicinity of the pole replacement locations would be less than significant.

Alternative A

Alternative A includes continuation of the existing conditions at the school campus; no new development would occur. As such, this alternative would avoid the less than significant (with mitigation) impact related to helicopter operations that would occur under the Project.

Alternative B

Alternative B includes implementation of the Project with the exception of the 13,482-square-foot expansion of the High School Building, which would not occur under this alternative. The proposed electricity service upgrade would occur under Alternative B, requiring the use of a helicopter. Mitigation Measure H-3 also would apply to Alternative B to ensure that impacts related to helicopter operations would be less than significant, similar to the Project.

Alternative C

Alternative C includes implementation of the Project with the exception of the 8,679-square-foot expansion of the Arts Center Building, which would not occur under this alternative. The proposed electricity service upgrade would occur under Alternative C, requiring the use of a helicopter. Mitigation Measure H-3 also would apply to Alternative C to ensure that impacts related to helicopter operations would be less than significant, similar to the Project.

Hydrology and Water Quality

Groundwater Recharge

Project

As discussed in Section IV.I (Hydrology and Water Quality) of the Draft EIR, implementation of the Project would increase the amount of impervious surface at the Project site by approximately 0.2 percent, which would result in an associated increase in storm water runoff from the Project site. However, because the Project site is not a source of groundwater recharge, this change in impervious surface at the Project site would have no effect on groundwater levels in the region. Therefore, no significant impacts related to groundwater recharge would occur as a result of the Project.

Alternative A

Alternative A includes continuation of the existing conditions at the school campus; no new development would occur. As such, this alternative would avoid the less than significant impact related to groundwater recharge that would occur under the Project.

Alternative B

Alternative B includes implementation of the Project with the exception of the 13,482-square-foot expansion of the High School Building, which would not occur under this alternative. Because the Project site is not a source of groundwater recharge, any development of the Project site would not affect groundwater recharge.

Alternative C

Alternative C includes implementation of the Project with the exception of the 8,679-square-foot expansion of the Arts Center Building, which would not occur under this alternative. Because the Project site is not a source of groundwater recharge, any development of the Project site would not affect groundwater recharge.

Erosion/Siltation

Project

As discussed in Section IV.I (Hydrology and Water Quality) of the Draft EIR, during the Project's construction and operational phases, additional sources of pollutants could be generated that could affect water quality. However, through compliance with the National Pollutant Discharge Elimination System (NPDES) requirements and City grading regulations and through compliance with the City's Low Impact Development (LID) Standards, the Project would minimize the potential for erosion/siltation to occur as a result of Specific Plan buildout. Therefore, Project impacts related to erosion siltation would be less than significant.

Alternative A

Alternative A includes continuation of the existing conditions at the school campus; no new development would occur. As such, this alternative would avoid the less than significant impact related to erosion and siltation that would occur under the Project.

Alternative B

Alternative B includes implementation of the Project with the exception of the 13,482-square-foot expansion of the High School Building, which would not occur under this alternative. Any development of the Project site would be required to comply with NPDES requirements and the City's LID Standards to ensure that impacts related to erosion/siltation would be less than significant.

Alternative C

Alternative C includes implementation of the Project with the exception of the 8,679-square-foot expansion of the Arts Center Building, which would not occur under this alternative. Any development of

the Project site would be required to comply with NPDES requirements and the City's LID Standards to ensure that impacts related to erosion/siltation would be less than significant.

Onsite/Offsite Flooding/Storm Drain Capacity

Project

As discussed in Section IV.I (Hydrology and Water Quality) of the Draft EIR, the Project would increase the amount of impervious surface at the Project site by approximately 0.2 percent, which would result in an associated increase in storm water runoff from the Project site. However, to meet the City LID Standards, the Project Applicant would be required to: 1) Conduct site assessment and identify design considerations, including determining the feasibility of on-site infiltration; 2) Apply site-specific source control measures; 3) Calculate the Stormwater Quality Design Volume; and 4) Implement stormwater quality control measures, including controlling stormwater discharge rates and volumes on the Project site to not exceed pre-Project conditions. Compliance with these measures would ensure that the stormwater discharge associated with Specific Plan buildout would not cause flooding off or on the Project site and would not require increased storm drain capacity. Therefore, Project impacts related to flooding and storm drain capacity would be less than significant.

Alternative A

Alternative A includes continuation of the existing conditions at the school campus; no new development would occur and no increase in impervious surfaces as with the Project. As such, this alternative would avoid the less than significant impact related to onsite/offsite flooding/storm drain capacity that would occur under the Project.

Alternative B

Alternative B includes implementation of the Project with the exception of the 13,482-square-foot expansion of the High School Building, which would not occur under this alternative. Any development of the Project site would be required to comply with the City's LID Standards to ensure that impacts related to onsite/offsite flooding/storm drain capacity would be less than significant.

Alternative C

Alternative C includes implementation of the Project with the exception of the 8,679-square-foot expansion of the Arts Center Building, which would not occur under this alternative. Any development of the Project site would be required to comply with the City's LID Standards to ensure that impacts related to onsite/offsite flooding/storm drain capacity would be less than significant.

Water Quality

Project

As discussed in Section IV.I (Hydrology and Water Quality) of the Draft EIR, during the Project's construction and operational phases, additional sources of pollutants could be generated that could affect water quality. However, through compliance with the NPDES requirements and City grading regulations and through compliance with the City's LID Standards, the Project would minimize the potential for erosion/siltation to occur as a result of Specific Plan buildout. Therefore, Project impacts related to erosion siltation would be less than significant.

Alternative A

Alternative A includes continuation of the existing conditions at the school campus; no new development would occur. As such, this alternative would avoid the less than significant impact related to water quality that would occur under the Project.

Alternative B

Alternative B includes implementation of the Project with the exception of the 13,482-square-foot expansion of the High School Building, which would not occur under this alternative. Any development of the Project site would be required to comply with NPDES requirements and the City's LID Standards to ensure that impacts related to water quality would be less than significant.

Alternative C

Alternative C includes implementation of the Project with the exception of the 8,679-square-foot expansion of the Arts Center Building, which would not occur under this alternative. Any development of the Project site would be required to comply with NPDES requirements and the City's LID Standards to ensure that impacts related to water quality would be less than significant.

Land Use and Planning

Project

As discussed in Section IV.J (Land Use and Planning) of the Draft EIR, the Project would be substantially consistent with all applicable land use plans, policies, and regulations associated with development of the Project site through the implementation of the Specific Plan. Therefore, Project impacts related to land use and planning would be less than significant.

Alternative A

Alternative A includes continuation of the existing conditions at the school campus; no new development would occur. As such, this alternative would avoid the less than significant impact related to land use and planning that would occur under the Project.

Alternative B

Alternative B includes implementation of the Project with the exception of the 13,482-square-foot expansion of the High School Building, which would not occur under this alternative. The development included as part of Alternative B is substantially similar to the Project and would not result in any significant impacts related to land use and planning.

Alternative C

Alternative C includes implementation of the Project with the exception of the 8,679-square-foot expansion of the Arts Center Building, which would not occur under this alternative. The development included as part of Alternative C is substantially similar to the Project and would not result in any significant impacts related to land use and planning.

Noise

Construction

Project

As discussed in Section IV.K (Noise) of the Draft EIR, during the Project's construction phase, construction-related noise levels could exceed LCF's Municipal Code daytime limit for temporary construction noise levels affecting single-family residences. Mitigation Measures K-1 and K-2 would mitigate the Project's impacts. Temporary noise barriers required by Measure K-2 would reduce construction noises at this receptor by between 5 dBA and 15 dBA, depending on their design. Project Design Features K-4 through K-7 would further reduce the Project's impacts to varying degrees. It is anticipated that helicopter support activities for pole installation would last approximately 1 hour and 15 minutes, per pole. Given the proximity of receptors to pole locations 3, 4, 9, and 11 and the two helicopter staging areas, noise levels from helicopter support activities would exceed NIOSH recommended duration limits at receptors in the Project area. This specific impact would be considered significant but mitigable. Mitigation Measure K-3 is required to reduce the Project's helicopter-related noise impacts to below NIOSH recommended duration limits. As a result, the Project's noise impacts during construction would be less than significant.

Alternative A

Alternative A includes continuation of the existing conditions at the school campus; no new development would occur. As such, this alternative would avoid the less than significant impact related to construction noise that would occur under the Project.

Alternative B

Alternative B includes implementation of the Project with the exception of the 13,482-square-foot expansion of the High School Building, which would not occur under this alternative. Alternative B would include construction activities that could exceed the LCFMC's daytime limit for temporary construction noise levels affecting single-family residences. Also, this alternative would include the electricity service upgrade, requiring the use of a helicopter. The construction-related noise impacts identified for the Project would similarly occur under Alternative B. Mitigation Measures K-1 through K-3 and Project Design Features K-4 through K-7 also would apply to this alternative. Impacts related to construction noise would be less than significant.

Alternative C

Alternative C includes implementation of the Project with the exception of the 8,679-square-foot expansion of the Arts Center Building, which would not occur under this alternative. Alternative C would include construction activities that could exceed the LCFMC's daytime limit for temporary construction noise levels affecting single-family residences. Also, this alternative would include the electricity service upgrade, requiring the use of a helicopter. The construction-related noise impacts identified for the Project would similarly occur under Alternative C. Mitigation Measures K-1 through K-3 and Project Design Features K-4 through K-7 also would apply to this alternative. Impacts related to construction noise would be less than significant.

Operation

Project

As discussed in Section IV.K (Noise) of the Draft EIR, during Project operations, campus improvements would produce noise impacts from on-site activities. However, Project would have a minimal off-site operational noise impact. Overall, the Project's operational noise impact would be less than significant.

Alternative A

Alternative A includes continuation of the existing conditions at the school campus; no new development would occur. As such, this alternative would avoid the less than significant impact related to operational noise that would occur under the Project.

Alternative B

Alternative B includes implementation of the Project with the exception of the 13,482-square-foot expansion of the High School Building, which would not occur under this alternative. Alternative B includes less development than the Project and also would minimal off-site operational noise impact. Operational noise impacts under Alternative B would be less than significant, similar to the Project.

Alternative C

Alternative C includes implementation of the Project with the exception of the 8,679-square-foot expansion of the Arts Center Building, which would not occur under this alternative. Alternative C includes less development than the Project and also would minimal off-site operational noise impact. Operational noise impacts under Alternative C would be less than significant, similar to the Project.

Groundborne Vibration

Project

Construction

As discussed in Section IV.K (Noise) of the Draft EIR, although there is a lack of research regarding the prediction of low frequency noise and vibration effects from helicopters, it can be reasonably expected that residences and other receptors in the vicinity of the Project's helicopter activities could experience continuous and/or intermittent building vibration and rattling events of up to 0.04 in/sec or greater. The Project's potential to produce vibration levels of 0.1 in/sec at receptors in close proximity to helicopter work areas cannot be ruled out. This impact would be considered significant but mitigable. Mitigation Measure K-3 would substantially reduce the potential for helicopter-related vibrations to significantly disturb or annoy receptors within the Project area.

Alternative A

Alternative A includes continuation of the existing conditions at the school campus; no new development would occur. As such, this alternative would avoid the less than significant (with mitigation) impact related to construction groundborne vibration that would occur under the Project.

Alternative B

Alternative B includes implementation of the Project with the exception of the 13,482-square-foot expansion of the High School Building, which would not occur under this alternative. The proposed electricity service upgrade would occur under Alternative B, requiring the use of a helicopter. The construction-related groundborne vibration impact identified for the Project similarly would occur under

this alternative. Mitigation Measure K-3 also would apply to Alternative B to ensure that construction-related groundborne vibration impacts would be less than significant, similar to the Project.

Alternative C

Alternative C includes implementation of the Project with the exception of the 8,679-square-foot expansion of the Arts Center Building, which would not occur under this alternative. The proposed electricity service upgrade would occur under Alternative C, requiring the use of a helicopter. The construction-related groundborne vibration impact identified for the Project similarly would occur under this alternative. Mitigation Measure K-3 also would apply to Alternative C to ensure that construction-related groundborne vibration impacts would be less than significant, similar to the Project.

Operation

Project

As discussed in Section IV.K (Noise) of the Draft EIR, during operations of the Project, there would be no significant stationary sources of groundborne vibration, such as industrial equipment. Operational groundborne vibration in the Project vicinity would be generated by vehicle travel on local roadways. However, passenger vehicles rarely create enough ground-borne vibration to be perceptible to humans unless road surfaces are poorly maintained and contain potholes or bumps. The Project's operational groundborne vibration impacts would be less than significant.

Alternative A

Alternative A includes continuation of the existing conditions at the school campus; no new development would occur. As such, this alternative would avoid the less than significant impact related to operational groundborne vibration that would occur under the Project.

Alternative B

Alternative B includes implementation of the Project with the exception of the 13,482-square-foot expansion of the High School Building, which would not occur under this alternative. Similar to the Project, Alternative B does not include an increase in student enrollment or the number of faculty at the school and as such, would not result in an increase in traffic and associated groundborne vibration. Impacts related to operational groundborne vibration would be less than significant under this alternative, similar to the Project.

Alternative C

Alternative C includes implementation of the Project with the exception of the 8,679-square-foot expansion of the Arts Center Building, which would not occur under this alternative. Similar to the

Project, Alternative C does not include an increase in student enrollment or the number of faculty at the school and as such, would not result in an increase in traffic and associated groundborne vibration. Impacts related to operational groundborne vibration would be less than significant under this alternative, similar to the Project.

Public Services

Project

As discussed in Section IV.L (Public Services) of the Draft EIR, through preparation and implementation of the Construction Management Plan (which is part of the Specific Plan and included as Mitigation Measure M-1) and any additional fire and life-safety conditions imposed by the City and County, the temporary and intermittent construction activities associated with buildout of the Specific Plan would not require the need for new or altered fire or sheriff protection facilities. Therefore, the Project's construction-related impacts on fire and sheriff protection services would be less than significant.

Further, although buildout of the Specific Plan would expand building square footage on the campus, the Specific Plan does not include an increase in student enrollment or faculty or a substantial increase in the number of school events that do (and would continue to) occur at the campus. Thus, school activity under buildout of the Specific Plan would remain substantially similar to the existing school activity and would not increase the need for fire or sheriff protection services.

Alternative A

Alternative A includes continuation of the existing conditions at the school campus; no new development would occur. As such, this alternative would avoid the less than significant impact related to public services that would occur under the Project.

Alternative B

Alternative B includes implementation of the Project with the exception of the 13,482-square-foot expansion of the High School Building, which would not occur under this alternative. Although Alternative B includes development of slightly less square footage than the Project, the impact related to public services identified for the Project would similarly occur under Alternative B. Mitigation Measure M-1 also would apply to Alternative B to ensure that construction activities would not impair fire or sheriff services to the Project site area in the event of an emergency. Therefore, impacts related to public services under Alternative B would be less than significant, similar to the Project.

Alternative C

Alternative C includes implementation of the Project with the exception of the 8,679-square-foot expansion of the Arts Center Building, which would not occur under this alternative. Although

Alternative C includes development of slightly less square footage than the Project, the impact related to public services identified for the Project would similarly occur under Alternative C. Mitigation Measure M-1 also would apply to Alternative C to ensure that construction activities would not impair fire or sheriff services to the Project site area in the event of an emergency. Therefore, impacts related to public services under Alternative C would be less than significant, similar to the Project.

Transportation/Traffic

Construction

Project

As discussed in Section IV.M (Transportation/Traffic) of the Draft EIR, construction-related traffic could affect local traffic conditions during the Project's construction phase. However, implementation of Mitigation Measure M-1 would ensure that construction-related traffic impacts would be less than significant.

Alternative A

Alternative A includes continuation of the existing conditions at the school campus; no new development would occur. As such, this alternative would avoid the less than significant (with mitigation) impact related to construction traffic that would occur under the Project.

Alternative B

Alternative B includes implementation of the Project with the exception of the 13,482-square-foot expansion of the High School Building, which would not occur under this alternative. Although Alternative B includes development of slightly less square footage than the Project, construction-related traffic under this alternative could affect local traffic conditions. Mitigation Measure M-1 also would apply to Alternative B to ensure that construction-related traffic impacts would be less than significant, similar to the Project.

Alternative C

Alternative C includes implementation of the Project with the exception of the 8,679-square-foot expansion of the Arts Center Building, which would not occur under this alternative. Although Alternative C includes development of slightly less square footage than the Project, construction-related traffic under this alternative could affect local traffic conditions. Mitigation Measure M-1 also would apply to Alternative C to ensure that construction-related traffic impacts would be less than significant, similar to the Project.

CMP Facilities

Project

As discussed in Section IV.M (Transportation/Traffic) of the Draft EIR, The Project does not include an increase in student or faculty population and would not result in an increase in operational traffic over existing conditions. For this, reason the Project would not add a total of 50 or more trips during either peak hour to a Congestion Management Program (CMP) arterial monitoring location or 150 or more trips in either direction during the peak hours to a freeway-monitoring location. Therefore, Project impacts related to CMP facilities would be less than significant.

Alternative A

Alternative A includes continuation of the existing conditions at the school campus; no new development would occur. As such, this alternative would avoid the less than significant impact related to CMP facilities that would occur under the Project.

Alternative B

Alternative B includes implementation of the Project with the exception of the 13,482-square-foot expansion of the High School Building, which would not occur under this alternative. Similar to the Project, Alternative B does not include an increase in student enrollment or the number of faculty at the school and would not result in an increase in operational traffic. Thus, this alternative would not result in any significant impacts to CMP facilities, similar to the Project

Alternative C

Alternative C includes implementation of the Project with the exception of the 8,679-square-foot expansion of the Arts Center Building, which would not occur under this alternative. Similar to the Project, Alternative C does not include an increase in student enrollment or the number of faculty at the school and would not result in an increase in operational traffic. Thus, this alternative would not result in any significant impacts to CMP facilities, similar to the Project

Design Hazards

Project

As discussed in Section IV.M (Transportation/Traffic) of the Draft EIR, the Project would have adequate sight distance at all proposed driveways. Therefore, Project impacts related to design hazards would be less than significant.

Alternative A

Alternative A includes continuation of the existing conditions at the school campus; no new development would occur. As such, this alternative would avoid the less than significant impact related to design hazards that would occur under the Project.

Alternative B

Alternative B includes implementation of the Project with the exception of the 13,482-square-foot expansion of the High School Building, which would not occur under this alternative. All driveways constructed as part of Alternative B would occur as described for the Project. Therefore, impacts related to design hazards would be less than significant.

Alternative C

Alternative C includes implementation of the Project with the exception of the 8,679-square-foot expansion of the Arts Center Building, which would not occur under this alternative. All driveways constructed as part of Alternative C would occur as described for the Project. Therefore, impacts related to design hazards would be less than significant.

Emergency Access

Project

As discussed in Section IV.M (Transportation/Traffic) of the Draft EIR, the Project would be subject to the applicable regulations of the LFC Municipal Code including, but not limited to, compliance with building code standards, building inspections, setbacks from trees and shrubs, ingress/egress, and any other recommendations made by the Los Angeles County Fire Department (LACFD) to ensure adequate emergency access. Therefore, Project impacts related to emergency access would be less than significant.

Alternative A

Alternative A includes continuation of the existing conditions at the school campus; no new development would occur. As such, this alternative would avoid the less than significant impact related to emergency access that would occur under the Project.

Alternative B

Alternative B includes implementation of the Project with the exception of the 13,482-square-foot expansion of the High School Building, which would not occur under this alternative. Any development of the Project site would be subject to the requirements of the LFC Municipal Code and other recommendations made by the LACFD to ensure adequate emergency access. Therefore, impacts related to emergency access would be less than significant.

Alternative C

Alternative C includes implementation of the Project with the exception of the 8,679-square-foot expansion of the Arts Center Building, which would not occur under this alternative. Any development of the Project site would be subject to the requirements of the LFC Municipal Code and other recommendations made by the LACFD to ensure adequate emergency access. Therefore, impacts related to emergency access would be less than significant.

Conflicts with Alternate Transportation Policies, Plans, or Programs

Project

As discussed in Section IV.M (Transportation/Traffic) of the Draft EIR, the school currently implements a Transportation Demand Program (the “TDM Program”) that began in the Fall of 2013 to limit the school’s daily operational traffic to 344 vehicle trips (in and out) during the a.m. peak hour and 275 vehicle trips (in and out) during the FSHA p.m. peak hour, during a normal school day, and to minimize school event traffic. The TDM Program requires FSHA to implement measures that reduce FSHA-generated vehicle trips. Implementation of the TDM Program would continue as part of the Specific Plan. Therefore, Project impacts related to conflicts with alternate transportation policies, plans, or programs would be less than significant.

Alternative A

Alternative A includes continuation of the existing conditions at the school campus; no new development would occur. As such, this alternative would avoid the less than significant impact related to conflicts with alternate transportation policies, plans, or programs that would occur under the Project.

Alternative B

Alternative B includes implementation of the Project with the exception of the 13,482-square-foot expansion of the High School Building, which would not occur under this alternative. With or without Alternative B (or the Project), the school is required to implement the TDM Program. Therefore, impacts related to conflicts with alternate transportation policies, plans, or programs would be less than significant under Alternative B, similar to the Project.

Alternative C

Alternative C includes implementation of the Project with the exception of the 8,679-square-foot expansion of the Arts Center Building, which would not occur under this alternative. With or without Alternative C (or the Project), the school is required to implement the TDM Program. Therefore, impacts related to conflicts with alternate transportation policies, plans, or programs would be less than significant under Alternative C, similar to the Project.

Utilities and Service Systems

Wastewater

Project

As discussed in Section IV.N (Utilities and Service Systems – Wastewater) of the Draft EIR, implementation of the Project would result in net increase of 116,100 square feet of new school facilities, 99,000 square feet of which would be a parking structure, which would not generate any wastewater. The Project would not generate an increase in student enrollment or the number of faculty and as such, the Project is not anticipated to result in an increase in wastewater generation over existing conditions. However, for a conservative analysis, according to the Sanitation Districts' calculations, the Project would result in a net generation increase of approximately 3,411 gallons of wastewater per day. Wastewater from the Project site is (and would continue to be) treated at either the Whittier Narrows Water Reclamation Plant (WRP) or the Los Coyotes WRP, which have a combined treatment capacity of 52.5 million gallons per day (mgd) and currently treat a combined average flow of 25.6 mgd, with a remaining combined average flow availability of approximately 26.9 mgd. This remaining combined average flow availability could accommodate the Project's 0.0034 mgd of wastewater. Thus, the Project would not require the construction or expansion of a wastewater treatment facility. Therefore, Project impacts related to wastewater would be less than significant.

Alternative A

Alternative A includes continuation of the existing conditions at the school campus; no new development would occur. As such, this alternative would avoid the less than significant impact related to wastewater that would occur under the Project.

Alternative B

Alternative B includes implementation of the Project with the exception of the 13,482-square-foot expansion of the High School Building, which would not occur under this alternative. Alternative B includes development of less square footage and would in principle generate less wastewater than under the Project. Therefore, impacts related to wastewater under Alternative B would be less than significant, similar to the Project.

Alternative C

Alternative C includes implementation of the Project with the exception of the 8,679-square-foot expansion of the Arts Center Building, which would not occur under this alternative. Alternative C includes development of less square footage and would in principle generate less wastewater than under the Project. Therefore, impacts related to wastewater under Alternative C would be less than significant, similar to the Project.

Water

Project

As discussed in Section IV.N (Utilities and Service Systems – Water) of the Draft EIR, implementation of the Project would result in net increase of 116,100 square feet of new school facilities, 99,000 square feet of which would be a parking structure, which would not consume any water. The Project would not generate an increase in student enrollment or the number of faculty and as such, the Project is not anticipated to result in an increase in water consumption over existing conditions. However, for a conservative analysis and assuming that water consumption would approximate wastewater generation, the Project would result in a net consumption increase of approximately 8,115 gallons of water per day. The Project does not include any increase in student enrollment or faculty and as such, would not create any indirect population growth and would not create a demand for water supply that has not already been accounted for in the Foothill Municipal Water District's (FMWD) 2015 Urban Water Management Plan (UWMP). Additionally, specific measures that have been incorporated into the Project and would be required to be incorporated into final building plans (refer to Mitigation Measure N-1). Water provided to the Project is treated at the F.E. Weymouth water treatment plant, which has a capacity of 520 mgd. The capacity of the F.E. Weymouth water treatment plant is sized to accommodate MWD's existing and projected water demands. As such, projects that are consistent with water demand projections in FMWD's 2015 UWMP would not create an additional need for water treatment. For these reasons, the Project would not require new or expanded water supplies or treatment facilities. Therefore, Project impacts related to water supply and treatment would be less than significant.

Alternative A

Alternative A includes continuation of the existing conditions at the school campus; no new development would occur. As such, this alternative would avoid the less than significant impact related to water that would occur under the Project.

Alternative B

Alternative B includes implementation of the Project with the exception of the 13,482-square-foot expansion of the High School Building, which would not occur under this alternative. Alternative B includes development of less square footage and would in principle consume less water than under the Project. Therefore, impacts related to water under Alternative B would be less than significant, similar to the Project.

Alternative C

Alternative C includes implementation of the Project with the exception of the 8,679-square-foot expansion of the Arts Center Building, which would not occur under this alternative. Alternative C includes development of less square footage and would in principle consume less water than under the

Project. Therefore, impacts related to water under Alternative C would be less than significant, similar to the Project.

Solid Waste

Project

As discussed in Section IV.N (Utilities and Service Systems – Solid Waste) of the Draft EIR, the Project would generate approximately 807 tons of solid waste over the construction period. The Project developer would be required to comply with LCF's Municipal Code Chapter 9.14 and divert at least 65 percent of the demolition/construction debris to a recycling facility. As discussed previously, the remaining daily intake capacity of Sunshine Canyon, Scholl Canyon, and Chiquita Canyon landfills is 9,585 tons per day and as such, would be adequate to accommodate the demolition/construction debris generated by the Project. Thus, Project construction would not require the need for new or expanded landfill capacity. Therefore, the Project's construction-related impacts on solid waste would be less than significant.

Further, solid waste generation associated with school operations is largely tied to student enrollment and number of faculty. The Project does not include an increase in student enrollment or the number of faculty, and it is anticipated that buildout of the Specific Plan would not result in an increase in daily solid waste generation. However, for a conservative analysis, this EIR assumes an increase in solid waste generation based on square footage and not student enrollment and faculty. Excluding the effectiveness of the City's recycling requirements and the recycling program implemented at the school, the Project conservatively would generate approximately 0.4 tons of solid waste per day. This potential increase in solid waste generation at the school would represent 0.004 percent of the available daily intake at Sunshine Canyon, Scholl Canyon, and Chiquita Canyon landfills serving the Project site. Because the landfills serving the Project would have adequate capacity to accommodate the potential increase in solid waste associated with the Project, the Project's operation phase would not require the need for new or expanded landfill capacity. Therefore, the Project's operation-related impacts on solid waste would be less than significant.

Alternative A

Alternative A includes continuation of the existing conditions at the school campus; no new development would occur. As such, this alternative would avoid the less than significant impact related to solid waste that would occur under the Project.

Alternative B

Alternative B includes implementation of the Project with the exception of the 13,482-square-foot expansion of the High School Building, which would not occur under this alternative. Alternative B includes development of less square footage and would in principle generate less solid waste than under

the Project. Therefore, impacts related to solid waste under Alternative B would be less than significant, similar to the Project.

Alternative C

Alternative C includes implementation of the Project with the exception of the 8,679-square-foot expansion of the Arts Center Building, which would not occur under this alternative. Alternative C includes development of less square footage and would in principle generate less solid waste than under the Project. Therefore, impacts related to solid waste under Alternative C would be less than significant, similar to the Project.

Energy

Project

As discussed in Section IV.N (Utilities and Service Systems – Energy) of the Draft EIR, the Project would consume approximately 198,094 kilowatt hours per year (kw-h/yr) of electricity and 34,302 cubic feet per month (cf/mo) of natural gas more than compared to existing conditions. The Project would incorporate various energy conservation features to minimize the Project's demand for energy. The Project's demand for electricity and natural gas can be provided by Southern California Edison and Southern California Gas Company, respectively. Therefore, the Project would not result in a wasteful or inefficient use of energy..

Alternative A

Alternative A includes continuation of the existing conditions at the school campus; no new development would occur. As such, this alternative would not result in a wasteful or inefficient use of energy, similar to the Project.

Alternative B

Alternative B includes implementation of the Project with the exception of the 13,482-square-foot expansion of the High School Building, which would not occur under this alternative. Alternative B includes development of less square footage and would in principle consume less energy than under the Project. Therefore, this alternative would not result in a wasteful or inefficient use of energy, similar to the Project.

Alternative C

Alternative C includes implementation of the Project with the exception of the 8,679-square-foot expansion of the Arts Center Building, which would not occur under this alternative. Alternative C includes development of less square footage and would in principle consume less energy than under the

Project. Therefore, this alternative would not result in a wasteful or inefficient use of energy, similar to the Project.

RELATIONSHIP OF THE ALTERNATIVE TO THE PROJECT OBJECTIVES

Alternative A would not meet any of the Project Objectives.

Alternative B would meet most of the important Project Objective, but to a lesser degree than the Project, because Alternative B does not include expansion of the High School Building.

Alternative C would meet most of the important Project Objective, but to a lesser degree than the Project, because Alternative C does not include expansion of the Arts Center Building.

ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Alternative A (the No Project Alternative) would be environmentally superior to the Project, since this alternative would avoid all of the significant (but mitigatable) impacts, including Aesthetics (Scenic Vistas/Resources), Air Quality (Regional and Localized Construction Emissions and Sensitive Receptors) Biological Resources (Special-Status Species, Riparian Habitat/Sensitive Natural Community, Jurisdictional Wetlands, Wildlife Movement, Trees, and Nesting Birds and Raptor Foraging), Cultural Resources (Archaeological/Tribal Resources), Geology and Soils, Hazards and Hazardous Materials (Impair/Interfere with Emergency Response/Evacuation Plan, Wildland Fires, and Helicopter Operations), Noise (Construction Noise), and Transportation/Traffic (Construction Traffic), and the significant unavoidable impact related to Cultural Resources (Historical Resources) that would occur under the Project. Also, Alternative A would not achieve any of the Project objectives.

In accordance with *CEQA Guidelines* Section 15126.6(e), if the environmentally superior alternative is the “no project” alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives. Both Alternatives B and C include development of the Project site with land uses that are substantially similar to the Project, but reduced.

As discussed previously and as shown on Table VI-1, all of the impacts identified for the Project would occur similarly under Alternatives B and C. Because Alternative B would include development of less square footage than Alternative C and as such would result in somewhat less construction-related emissions and traffic, Alternative B is the Environmentally Superior Alternative.

**Table VI-1
Comparison of Impacts under the Project to Impacts under the Alternatives**

Environmental Issues Analyzed in the EIR	Project Impacts	Impacts Under the Alternatives		
		Alternative A: No Project	Alternative B: No High School Building Expansion	Alternative C: No Arts Center Building Expansion
Erosion/Siltation	LTS	NC	LTS	LTS
Onsite/Offsite Flooding/Storm Drain Capacity	LTS	NC	LTS	LTS
Water Quality	LTS	NC	LTS	LTS
Land Use and Planning				
Plan/Policy Consistency	LTS	NI	LTS	LTS
Noise				
Construction Noise	LTS w/M	NI	LTS w/M	LTS w/M
Operational Noise	LTS	NC	LTS	LTS
Groundborne Vibration	LTS w/M	NC	LTS w/M	LTS w/M
Public Services				
Fire	LTS	NC	LTS	LTS
Sheriff	LTS	NC	LTS	LTS
Transportation/Traffic				
Construction	LTS w/M	NC	LTS w/M	LTS w/M
CMP Facilities	LTS	NC	LTS	LTS
Design Hazards	LTS	NC	LTS	LTS
Emergency Access	LTS	NC	LTS	LTS
Conflicts with Alternate Transportation Policies, Plans or Programs	LTS	NC	LTS	LTS
Utilities and Service Systems				
Wastewater	LTS	NC	LTS	LTS
Water	LTS	NC	LTS	LTS
Solid Waste	LTS	NC	LTS	LTS
Energy	LTS	NC	LTS	LTS
LTS = less than significant impact		NC = no change over the existing condition		
LTS w/M = less than significant impact with mitigation incorporated		NI = no impact		
SU = significant unavoidable impact				