



7.0 Alternatives to the Proposed Project



7.0 ALTERNATIVES TO THE PROPOSED PROJECT

Under CEQA, the identification and analysis of alternatives to a project is a fundamental part of the environmental review process. CEQA Public Resources Code Section 21002.1(a) establishes the need to address alternatives in an Environmental Impact Report (EIR) by stating that in addition to determining a project's significant environmental impacts and indicating potential means of mitigating or avoiding those impacts, "the purpose of an environmental impact report is ... to identify alternatives to the project."

Direction regarding the definition of project alternatives is provided in the *CEQA Guidelines* as follows:

An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits.¹

The *CEQA Guidelines* emphasize that the selection of project alternatives be based primarily on the ability to reduce significant effects relative to the proposed project, "even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly."² The *CEQA Guidelines* further direct that the range of alternatives be guided by a "rule of reason," such that only those alternatives necessary to permit a reasoned choice are addressed.³

In selecting project alternatives for analysis, potential alternatives must pass a test of feasibility. *CEQA Guidelines* Section 15126.6(f)(1) states that:

Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries...and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent).

Beyond these factors, *CEQA Guidelines* require the analysis of a "no project" alternative and an evaluation of alternative location(s) for the project, if feasible. Based on the alternatives analysis, an environmentally superior alternative is to be designated. If the environmentally superior alternative is the No Project Alternative, then the EIR shall identify an environmentally superior alternative among the other alternatives.⁴ In addition, *CEQA Guidelines* Section 15126.6(c) requires that an EIR identify any alternatives that were considered for analysis but rejected as infeasible and discuss the reasons for their rejection.

The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making. The range of potential alternatives to the proposed project shall also include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. Among

¹ *CEQA Guidelines* Section 15126.6(a).

² *CEQA Guidelines* Section 15126.6(b).

³ *CEQA Guidelines* Section 15126.6(f).

⁴ *CEQA Guidelines* Section 15126.6(e)(2).



the factors that may be considered when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, General Plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site (or the site is already owned by the proponent). Only locations that would avoid or substantially lessen any of the project's significant effects need be considered for inclusion. An alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative need not be considered.

Potential environmental impacts associated with the following alternatives are compared to the Project's impacts:

- Alternative 1 – “No Project” Alternative;
- Alternative 2 – “Light Industrial” Alternative; and
- Alternative 3 – “Multi-Family Residential” Alternative.

Throughout the following analysis, the alternatives' impacts are analyzed for each environmental issue area, as examined in Section 5.1, *Land Use and Relevant Planning*, through Section 5.12, *Public Services and Utilities*, of this EIR. In this manner, each alternative can be compared to the Project on an issue-by-issue basis. A table is included at the end of this section that provides an overview of the alternatives analyzed and a comparison of each alternative's impact in relation to the Project. This section also identifies alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process. Among the factors used to eliminate alternatives from detailed consideration are: failure to meet most of the basic project objectives; infeasibility; or inability to avoid significant environmental impacts. Section 7.7, *“Environmentally Superior” Alternative*, references the “environmentally superior” alternative, as required by the *CEQA Guidelines*.

7.1 SUMMARY OF PROJECT OBJECTIVES

An EIR must only discuss in detail an alternative that is capable of feasibly attaining most of the basic objectives associated with the action, while at the same time avoiding or substantially lessening any of the significant effects associated with the proposed Project. A summary of the objectives, as provided within Section 3.0, *Project Description*, is provided below:

1. Provide senior housing within Azusa;
2. Provide housing within Azusa that would help the City meet Regional Housing Needs Allocation (RHNA) requirements detailed in the *City of Azusa 2014-2021 Housing Element*;
3. Provide an amenity-rich, luxurious lifestyle residential community;
4. Integrate development within the Specific Plan Area with existing and future surrounding development;
5. Create a design that ensures attractive architecture for buildings, outdoor spaces, landscaping, and establishes a distinct yet harmonized look and feel;



6. Develop a residential community that provides fiscal benefit to the City, whereby revenues from the new community exceed public expenditures needed to serve and maintain the community;
7. Provide public infrastructure improvements required to support the land uses envisioned under the Specific Plan; and
8. Provide continued connectivity for golf play between golf holes 2 and 7 north of West Sierra Madre Avenue and golf holes 3 through 6 south of West Sierra Madre Avenue.

7.2 SUMMARY OF SIGNIFICANT IMPACTS

Pursuant to Section 15126.6(a) of the *CEQA Guidelines*, an EIR shall describe a range of reasonable alternatives to the project that would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives. Only those impacts found significant and unavoidable are relevant in making the final determination of whether an alternative is environmentally superior or inferior to the proposed Project. However, as analyzed in [Section 5.1](#) through [Section 5.12](#) of this EIR, the Project would not result in any significant and unavoidable impacts.

Findings rejecting alternatives are required only if one or more significant environmental effects will not be avoided or substantially lessened by mitigation measures. An agency need not make findings rejecting alternatives described in the EIR if all the project's significant impacts will be avoided or substantially lessened by mitigation measures. An agency need make only one or more of the findings listed in Public Resource Code §21081(a) for each significant impact, so if it makes a mitigation finding for each significant impact, no further findings are required. (See Public Resources Code Section 21081(a)(1)-(2); CEQA Guidelines Section 15091(a)(1)-(2).)

In *Laurel Hills Homeowners Ass'n v. City Council* (1978) 83 Cal.App.3d 515, the court held that, if mitigation measures substantially lessen a project's significant environmental effects, the lead agency may approve the project without making findings on the feasibility of the EIR's project alternatives. Noting that mitigation measures and project alternatives are mentioned in Public Resources Code Sections 21002-21002.1 in the alternative, the court concluded that CEQA does not mandate the choice of the environmentally most desirable project if, through mitigation measures alone, the agency has reduced the project's environmental effects to an acceptable level. (*Laurel Hills, supra*, 83 Cal.App.3rd at 521; see also *Stevens v. City of Glendale* (1981) 125 Cal.3rd 986, 996; *No Slo Transit, Inc. v. City of Long Beach* (1987) 197 Cal.App.3rd 241.)

In *Laurel Heights Improvement Ass'n v. Regents of Univ. of Cal.* (1988) 47 Cal.3d 376, 402, the California Supreme Court noted with approval the holding in *Laurel Hills* that CEQA does not require an agency to consider an environmentally superior alternative when approving a project if mitigation measures will substantially reduce environmental impacts. (See also *Rio Vista Farm Bureau Ctr. v. County of Solano* (1992) 5 Cal.App.4th 351, 379 [agency is not required to make findings on feasibility of EIR's alternatives if mitigation measures will reduce environmental impacts to acceptable levels].)

Thus, when an agency finds that significant adverse effects will be avoided or substantially lessened by mitigation measures, it need not make findings that environmentally superior alternatives are infeasible. (See *Mira Mar Mobile Community v. City of Oceanside* (2004) 119 Cal.App.4th 477; *Protect Our*



Water v. County of Merced (2003) 110 Cal.App.4th 362, 373; *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3rd 692.)

7.3 ALTERNATIVES CONSIDERED BUT REJECTED

In accordance with *CEQA Guidelines* Section 15126.6(c), an EIR should identify any alternatives that were considered for analysis but rejected as infeasible and briefly explain the reasons for their rejection. According to *CEQA Guidelines*, among the factors that may be used to eliminate alternatives from detailed consideration are the alternative's failures to meet most of the basic project objectives, the alternative's infeasibility, or the alternative's inability to avoid significant environmental impacts. The following possible alternatives were considered but not carried forward for additional analysis, since they would not accomplish most of the basic objectives of the Project or were considered infeasible.

“ALTERNATIVE SITE” ALTERNATIVE

The Alternative Site Alternative would involve relocating the Project to another site within the City. This alternative would generally retain the same characteristics (proposed land uses, square footage, site plan, amenities, etc.) of the Project. It is assumed the golf course reconfiguration component of the Project would not be required since the Azusa Greens Country Club golf course would not be impacted under the Alternative Site Alternative.

The Alternative Site Alternative would require adequate land, access, infrastructure, and must be compatible with existing *City of Azusa General Plan*, April 2004 (General Plan) and *City of Azusa Municipal and Development Code* (Municipal Code) designations/zoning for the Site. Although other suitable sites may be available that could accommodate the Project, it is not anticipated that the Alternative Site Alternative would substantially lessen any of the significant impacts associated with the Project. There are also no other areas of the golf course that could accommodate the Senior Village due to circulation and safety implications. Regardless of where the Project is located within the City, the proposed Specific Plan would require a General Plan Amendment to change the existing land use designation(s) to Specific Plan and a Zone Change to change the existing zoning to Specific Plan. While short-term less than significant construction impacts would be reduced because no golf course reconfiguration would be required, long-term operational and cumulative air quality, greenhouse gas, and noise impacts would remain similar due to the same operational trip generation. Additionally, the Project as currently proposed does not result in any significant and unavoidable environmental impacts. Thus, the Alternative Site Alternative was rejected from further analysis since: 1) the Project Applicant has already established an agreement with the Azusa Greens Country Club, LLC to purchase the Specific Plan Area of the existing golf course and both entities have invested substantial resources in the due diligence and planning of the Project and golf course reconfiguration, respectively; 2) the Project Applicant does not own any other appropriate alternative site that could be developed to meet most of the Project objectives ; and 3) relocation to another site would likely result in similar less than significant or less than significant impacts with mitigation incorporated. Consequently, the Alternative Site Alternative was rejected from further consideration within this EIR.



7.4 “NO PROJECT” ALTERNATIVE

In accordance with the *CEQA Guidelines*, “the no project analysis shall discuss the existing conditions . . . , as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.”⁵ The *CEQA Guidelines* continue to state that “in certain instances, the no project alternative means ‘no build’ wherein the existing environmental setting is maintained.”⁶ The No Project Alternative includes a discussion and analysis of the existing baseline conditions at the time the Notice of Preparation was published on June 27, 2018. The No Project Alternative is described and analyzed in order to enable the decision-makers to compare the impacts of approving the Project with the impacts of not approving the Project.

DESCRIPTION OF ALTERNATIVE

The 19.36-acre Site is currently developed with golf holes 3, 4, 5, and 6 of the Azusa Greens Country Club; refer to Exhibit 3-2, *Site Vicinity*. The Site mostly consists of vegetative cover, grass fairways, several sand traps, and ornamental trees and lighting lining both sides of each fairway. Golf course netting and larger ornamental trees are also located along the Site perimeter to protect adjacent uses from stray golf balls. A single concrete block restroom structure is located between the north/south holes (holes 3 and 6) and the east/west holes (holes 4 and 5). Concrete paved golf cart paths are provided along the fairways adjacent to North Todd Avenue and 10th Street. The No Project Alternative would retain the Site in its current condition. The proposed Specific Plan would not be adopted, the Senior Village would not be developed, and the golf course would not be reconfigured. No new development would be constructed on-site, and no landscape or hardscape improvements would be provided.

The following discussion evaluates the potential environmental impacts associated with the No Project Alternative, as compared to impacts from the Project.

IMPACT COMPARISON TO THE PROPOSED PROJECT

Land Use and Relevant Planning

Under the No Project Alternative, the Site would continue to operate as a golf course and no new development would occur. The proposed entitlement requests for the Specific Plan Area, including adoption of the Specific Plan, approval of a General Plan Amendment, Zone Change, Tentative Tract Map, and Design Review, and entitlement requests for the Golf Course Reconfiguration Area, including approval of a golf course reconfiguration plan, Tentative Tract Map, and Design Review, would not be required under the No Project Alternative. This alternative would also be consistent with the *City of Azusa General Plan* (General Plan) goals and policies and *City of Azusa Municipal and Development Code* (Municipal Code) for the Site’s existing Open Space land use designation and Recreation zoning district. Thus, the No Project Alternative would be environmentally superior to the Project regarding land use and relevant planning.

⁵ *CEQA Guidelines* Section 15126.6(e)(2).

⁶ *CEQA Guidelines* Section 15126.6(e)(3)(B).



Aesthetics/Light and Glare

The short-term visual impacts associated with Project grading and construction activities would not occur under the No Project Alternative. Therefore, the Project's less than significant construction-related impacts to the visual character/quality of the Site and its surroundings would be avoided. Both the No Project Alternative and Project would have no impact on any designated scenic views or vistas in the Site vicinity.

The Site's long-term visual character would be altered with the development of the Project, a Senior Village in the Specific Plan Area and a reconfiguration of the existing golf course in the Golf Course Reconfiguration Area. The Senior Village would incorporate various architectural elements, development standards, and landscape features to reduce the Specific Plan's potential impact to visual character. Additionally, the Golf Course Reconfiguration Area would retain its current land use as a golf course and improvements occurring within this portion of the Site would result in an overall enhancement to the character and quality of the golf course during operations. The Project would also increase light and glare sources in the Project vicinity but would be similar to lighting associated with the adjacent industrial and residential uses. With implementation of the No Project Alternative, these less than significant changes in long-term visual character of the Site would not occur, and the Site would remain in its current condition as a golf course. The Project's change in visual character of the Specific Plan Area from a golf course to a Senior Village and increased light and glare would no longer result. As such, the No Project Alternative would be environmentally superior to the Project regarding aesthetics/light and glare.

Biological Resources

Project implementation would not impact special status species, sensitive natural communities, or jurisdictional waters and wetlands. Impacts to migratory birds and on-site trees protected under the City of Azusa Tree Preservation and Protection Ordinance (per Municipal Code Section 62-191 through 62-201) would be reduced to less than significant levels with mitigation incorporated.

Under the No Project Alternative, no construction activities would occur, and the Site would remain in its current condition as a golf course. Therefore, although less than significant with mitigation incorporated, the Project's potential impacts to migratory birds and the 200 on-site protected trees proposed for removal would be avoided. As with the Project, no impact to special status plant species, sensitive vegetation communities, wetlands, jurisdictional waters would occur under the No Project Alternative.

The No Project Alternative would be environmentally superior to the Project regarding biological resources, given it would avoid impacts to migratory birds and protected trees.

Tribal and Cultural Resources

No historic properties, archaeological resources, or paleontological resources were identified on the Site. Although the Site has low sensitivity for archaeological, paleontological resources, and tribal cultural resources, standard conditions of approval, in compliance with Municipal Code requirements, have been incorporated in the event unknown buried resources are encountered during ground-disturbing activities. Under the No Project Alternative, no ground-disturbing activities would occur on-site, and thus, these less than significant impacts would be avoided.



Comparatively, less than significant impacts would occur to cultural resources under the Project, while no impacts would occur under the No Project Alternative. As such, the No Project Alternative would be environmentally superior to the Project regarding cultural resources, given it would avoid the potential for any impact to occur.

Geology and Soils

Implementation of the No Project Alternative would not expose people or structures to potential adverse effects associated with seismic, geologic, or soil hazards, since no new land uses would be developed, and the Site would remain as part of the Azusa Greens Country Club golf course. The less than significant impacts to geology and soils under the Project would no longer occur.

The No Project Alternative would be environmentally superior to the Project pertaining to geology and soils impacts, given it would not introduce any people or structures to potential seismic, geologic, or soil hazards on-site.

Hydrology and Water Quality

The No Project Alternative would result in no short-term impacts to water quality associated with grading, excavation, or construction activities, as no construction would occur. In comparison, less than significant water quality Project impacts from construction activities would be avoided under the No Project Alternative.

In addition, the No Project Alternative would avoid the Project's long-term operational impacts to water quality and runoff volumes, as the Senior Village and associated landscape and hardscape improvements would not be developed. However, the Project's post-construction best management practices (BMPs) and Site improvements required by the County of Los Angeles' Low Impact Development provisions (e.g., parkway culverts and underground stormwater storage units) to address pollutants in storm water runoff and new drainage improvements would not be constructed under the No Project Alternative. Since new development would not occur, impacts related to hydrology and water quality under the Project would not occur under the No Project Alternative.

The No Project Alternative would be neither environmentally superior nor inferior to the Project regarding hydrology and water quality impacts. As construction activities would not occur and new land uses would not be developed, no changes in drainage patterns or on-site operations would occur. However, no BMPs would be constructed on-site that would improve drainage and water quality for downstream areas.

Hazards and Hazardous Materials

The No Project Alternative would leave the Site as part of the existing Azusa Greens Country Club golf course, and therefore, would not create any new significant hazards through the routine transport, use, or disposal of hazardous materials, or through reasonably foreseeable upset and accident conditions. The less than significant impacts (with mitigation incorporated) to hazards and hazardous materials under the Project would no longer occur.



The No Project Alternative would be environmentally superior to the Project pertaining to hazards and hazardous materials impacts, given that no new hazardous materials would be used at the Site that is not currently utilized for the maintenance of the existing golf course.

Traffic and Circulation

Construction-related traffic impacts associated with the Project would not occur under the No Project Alternative as no construction activities would occur. Therefore, the Project's less than significant impacts related to construction traffic would be avoided entirely.

Existing a.m. and p.m. peak hour intersection operating conditions were evaluated in [Section 5.8, Traffic and Circulation](#). All study intersections are currently operating at an acceptable LOS during peak hours based on the City of Azusa and City of Irwindale standards with the exception of Irwindale Avenue at Foothill Boulevard (No. 1) during p.m. peak hour conditions. Under "Future Without Project" conditions, all study intersections would operate at acceptable LOS during peak hours with the exception of the following intersections:

- Irwindale Avenue at Foothill Boulevard (No. 1) – a.m. and p.m. peak hours; and
- North Todd Avenue at Foothill Boulevard (No. 2) – a.m. peak hour only.

Although "Future Plus Project" conditions would generate additional vehicle trips and result in unacceptable LOS at the same intersections as the "Future Without Project" conditions, the Project would add less than 0.02 to the volume-to-capacity (V/C) ratio and therefore, the Project's incremental V/C ratio increase is less than significant and no mitigation is required; refer to [Table 5.8-8, Year 2022 Peak Hour Intersection Capacity Analysis](#). Further, the City of Irwindale utilizes a threshold of 50 peak hour trips, which the Project would not exceed at these study area intersections. Thus, operational traffic impacts associated with the Project and No Project Alternative would be similar.

However, the No Project Alternative would not involve the construction of a driveway along the east side of North Todd Avenue and also would not require the restriping of North Todd Avenue to provide a 12-foot wide two-way left-turn lane to accommodate potential queuing as vehicles enter and exit the Site and other industrial uses along North Todd Avenue (i.e., the Canyon City Business Center and 10th Street Center Industrial Business Park). Therefore, although less than significant with mitigation incorporated, the Project's impacts related to Site access and queuing would be avoided under the No Project Alternative.

As such, the No Project Alternative would be environmentally superior to the Project regarding traffic and circulation.

Air Quality

Since no construction or development would occur under the No Project Alternative, no short-term construction or long-term operational air quality emissions would be generated. Additionally, no construction localized significance emissions would be emitted under this alternative. The Site would remain an existing golf course and would not generate vehicle trips or uses that would emit air pollutants beyond existing conditions.



While the Project would be consistent with the South Coast Air Quality Management District (SCAQMD) 2016 *Air Quality Management Plan* (2016 AQMP) upon approval of the requested General Plan Amendment and Zone Change, this alternative would be consistent with the 2016 AQMP without the requested entitlements. Thus, the less than significant with mitigation incorporated impacts associated with the Project would be eliminated under this alternative.

The No Project Alternative would be environmentally superior to the Project regarding air quality, given it would avoid the Project's short-term and long-term operational air quality emissions and would be consistent with the 2016 AQMP.

Greenhouse Gas Emissions

No construction or development would occur under this alternative, and the Site would remain an existing golf course. While the Project would result in less than significant impacts to GHG emissions and consistency with applicable GHG plan, policies, and regulations, this alternative would not generate any GHG emissions and no impacts would occur. Thus, the No Project Alternative would be environmentally superior to the Project regarding GHG emissions.

Noise

No noise or vibration would be generated by the No Project Alternative since no construction or development would occur on-site. The Site would remain a part of the Azusa Greens Country Club golf course and would not generate vehicle trips that could increase operational mobile noise impacts. As such, the Project's less than significant impacts with mitigation incorporated related to construction noise and less than significant impacts related to vibration and operational noise (mobile and stationary sources) would not occur under the No Project Alternative.

The No Project Alternative would be environmentally superior to the Project regarding noise given it would result in no short- or long-term noise impacts compared to the Project.

Public Services and Utilities

Implementation of the Project would place increased demands upon public services (i.e., fire and police protection) and utilities and service systems (i.e., wastewater, water, and solid waste). Since no development would occur and the Site would remain an existing golf course under the No Project Alternative, increased demand for public services and utilities would not occur, and the less than significant impacts related to public services and utilities under the Project would be avoided.

The No Project Alternative would be environmentally superior in comparison to the Project, given that no demands for public services or utilities would occur.

ABILITY TO MEET PROJECT OBJECTIVES

The No Project Alternative would not attain any of the Project objectives with the exception of continued connectivity for golf play between golf holes north and south of West Sierra Madre Avenue (Objective No. 8). As no development would occur, a senior housing residential community with rich amenities that would help the City meet its RHNA requirements would not be developed (Objective Nos. 1, 2, and 3). An architecturally attractive development with outdoor



spaces and landscaping integrated into the surrounding development would not occur (Objective Nos. 4 and 5), and new revenue sources for the City and public infrastructure improvements would not occur (Objective Nos. 6 and 7).

7.5 “LIGHT INDUSTRIAL” ALTERNATIVE

DESCRIPTION OF ALTERNATIVE

The Light Industrial Alternative would consist of two components: 1) developing the northern 4.48-acre area with approximately 68,302 square feet of light industrial uses (Light Industrial Area); and 2) reconfiguring the southern 14.88-acre portion of the existing golf course to accommodate golf holes 3, 4, 5, and 6 (Golf Course Reconfiguration Area; similar to the proposed Project). The light industrial development assumes a floor area ratio of 0.35 and would include landscape and hardscape improvements similar to industrial business parks (e.g., surface parking areas and landscaped walkways). The Specific Plan would not be adopted, and the Senior Village and three-story parking garage would not be developed.

This alternative was selected to analyze a scenario in which a light industrial development would be developed similar to the Site’s neighboring industrial uses, such as the Rain Bird Corporation to the east and the 10th Street Center Industrial Business Park and planned Canyon City Business Center west of North Todd Avenue.

The following discussion evaluates the potential environmental impacts associated with the Light Industrial Alternative, as compared to impacts from the Project. As both this alternative and the Project would reconfigure the existing golf course in the Golf Course Reconfiguration Area, the following analysis focuses predominantly on the changes to the northern portion of the Site (referred to as the Light Industrial Area for the purposes of this alternative discussion).

IMPACT COMPARISON TO THE PROPOSED PROJECT

Land Use and Relevant Planning

This alternative would develop 68,302 square feet of light industrial use in the Light Industrial Area, which would require a General Plan Amendment to change the land use designation from Open Space to Light Industrial, and a Zone Change to change the zoning from Recreation to West End Industrial District. Similar to the Project, a Tentative Tract Map would also be required to subdivide the 14.88-acre Site into the Light Industrial Area and the Golf Course Reconfiguration Area. Additionally, the proposed golf course reconfiguration would still require approval of a golf course reconfiguration plan, Tentative Tract Map, and Design Review. As such, the Light Industrial Alternative would require similar entitlement approvals from the City as the proposed Project. This alternative would be neither environmentally superior nor inferior to the Project regarding land use and relevant planning.

Aesthetics/Light and Glare

Both the Project and the Light Industrial Alternative would have short-term visual impacts associated with demolition, grading, and construction activities. Given that this alternative is much less dense and would not require a three-story parking garage, construction duration would likely be



reduced compared to the Project. Thus, the Project's less than significant construction-related impacts to the visual character/quality of the Site vicinity would be slightly reduced.

Under this alternative, the long-term visual character of the Light Industrial Area would be altered from an existing golf course to an industrial development compared to the Project's Senior Village. No changes would occur to the Golf Course Reconfiguration Area between this alternative and the Project. The light industrial development would be required to comply with West End Industrial District development standards, including the appropriate setbacks, building height, signage, landscaping, etc. On the other hand, the Project would involve adopting a Specific Plan that would include specific development standards and design guidelines that would enhance the visual character of the Senior Village and its compatibility with surrounding uses. In comparison, the Light Industrial Alternative would be compatible and similar to neighboring industrial uses to the west; however, the Project's Specific Plan would include more detailed and comprehensive development standards and design guidelines for the Senior Village. As such, while the visual character and quality of this alternative would be substantially different from the Project (light industrial vs. residential), impacts related to the degradation of visual character and quality would neither be environmentally superior or inferior to the Project. Both this alternative and the Project would have no impact on scenic views and vistas, and light and glare impacts would be similar in both scenarios.

Overall, this alternative would be neither environmentally superior or inferior to the Project given that short- and long-term aesthetic/light and glare impacts would not be substantially different.

Biological Resources

The proposed changes to the Project under this alternative would still result in a similar development footprint as the Project. Therefore, similar to the Project, this alternative would have no impact on special status plant and wildlife species or sensitive vegetation communities, and construction impacts related to migratory birds and protected trees would be reduced to less than significant levels with mitigation incorporated.

Therefore, this alternative would be neither environmentally superior nor inferior to the Project regarding potential impacts to biological resources, given it would involve similar ground-disturbing activities within the same development area.

Tribal and Cultural Resources

The development footprint would be the same under the Project and the Light Industrial Alternative. Under both development scenarios, the Site would require similar grading and preparation to construct the proposed buildings (either a Senior Village or light industrial building(s)). As such, the potential to impact previously undiscovered cultural and tribal cultural resources on-site would be similar to the Project and the Light Industrial Alternative would be neither environmentally superior nor inferior to the Project.

Geology and Soils

Given that the Site limits and development area would remain the same, none of the Site-specific geologic conditions and hazards would be altered under this alternative. As such, the less than significant impacts identified under the Project would be similar under this alternative. The Light Industrial Alternative would be neither environmentally superior nor inferior to the Project.



Hydrology and Water Quality

Similar to the Project, this alternative would be required to comply with National Pollutant Discharge Elimination System requirements to reduce water quality impacts. This alternative would also result in exposed soils to wind and water erosion from grading and excavation activities. Although the proposed development is different, the overall grading impact area for exposed soils would be the same as the Project. As such, short-term construction impacts would be similar under both scenarios.

The Project and this alternative would also be required under a project-specific Stormwater Pollution Prevention Plan and Water Quality Management Plan to implement stormwater drainage infrastructure and associated water quality BMPs to minimize impacts during long-term operations. Thus, the less than significant hydrology and water quality impacts identified under the Project would be similar under this alternative.

As such, this alternative would be neither environmentally superior or inferior to the Project regarding hydrology and water quality.

Hazards and Hazardous Materials

Construction activities associated with the Project and the Light Industrial Alternative could similarly release hazardous materials into the environment through reasonably foreseeable upset and accident conditions. As such, less than significant impacts (with mitigation incorporated) related to hazards and hazardous materials during construction would be similar to the Project.

While a light industrial development may result in an increase in the routine use, transport, or disposal of hazards and hazardous materials, compared to the Project, permitted uses under this alternative would be required to comply with applicable local, State, and Federal regulations pertaining to the use of hazards and hazardous materials. Thus, although slightly increased, the long-term operational activities associated with this alternative would result in similar less than significant impacts as the Project.

This alternative would be neither environmentally superior or inferior to the Project.

Traffic and Circulation

Construction traffic associated with this alternative would likely be reduced compared to the Project since the light industrial development has a reduced density and would not require a three-story parking garage. Construction duration may also be reduced, which would further reduce construction-related traffic trips. Thus, the Project's less than significant with mitigation incorporated short-term construction traffic impacts would be further reduced under this alternative.

Based on the *Institute of Transportation Engineers (ITE) Trip Generation Manual* (Trip Generation Manual), 9th Edition, a 68,302-square foot light industrial development would generate 429 average daily trips with 74 a.m. peak hour trips and 56 p.m. peak hour trips. In comparison, the Project would generate 837 average daily trips with 48 a.m. peak hour trips and 62 p.m. peak hour trips; refer to [Table 5.8-6, Project Traffic Generation Forecast](#). Comparatively, this alternative would increase morning peak hour trips by 26 trips but would decrease average daily trips by 408 trips and evening



peak hour trips by 6 trips. A sensitivity analysis for the intersections of Irwindale Avenue/Foothill Boulevard and Todd Avenue/Foothill Boulevard was conducted for future cumulative conditions in year 2022. As shown in Table 7-1, *Light Industrial Alternative Year 2022 Peak Hour Intersection Capacity Analysis*, the Light Industrial Alternative would not result in any significant impacts at these two key intersections.

**Table 7-1
Light Industrial Alternative Year 2022 Peak Hour Intersection Capacity Analysis**

Key Intersections	Time Period	Existing Conditions		Year 2022 Without Alternative Conditions		Year 2022 Plus Alternative Conditions		Significant Impact	
		ICU/HCM	LOS	ICU/HCM	LOS	ICU/HCM	LOS	Increase	Yes/No
1 Irwindale Avenue at Foothill Boulevard	a.m.	0.820	D	0.940	E	0.940	E	0.000	No
	p.m.	0.938	E	1.182	F	1.190	F	0.008	No
2 Todd Avenue at Foothill Boulevard	a.m.	0.773	C	0.953	E	0.960	E	0.007	No
	p.m.	0.667	B	0.833	D	0.837	D	0.004	No

Notes:
Bold LOS values indicate adverse service levels based on City LOS standards
 s/v = seconds per vehicle (delay)
 ICU = Intersection Capacity Utilization
 HCM = Highway Capacity Manual

However, this alternative would still increase impacts to study area intersections during morning peak hour conditions. Further, the light industrial development may also involve more truck trips compared to a residential Senior Village, which would further impact surrounding intersections to a greater degree than passenger cars (based on a 2.5 passenger car equivalent for trucks). Overall, the less than significant with mitigation incorporated traffic and circulation impacts that would occur with the Project would be greater under this alternative. This alternative would be environmentally inferior to the Project regarding traffic and circulation impacts due to increased traffic volumes during morning peak hour conditions and increased truck trips associated with the light industrial development.

Air Quality

Compared to the Project, this alternative would likely require a shorter construction duration given the industrial development is much less dense and would not require a three-story parking garage. Thus, the short-term construction air quality emissions from demolition, grading, building, worker trips, and truck haul trips would be reduced. The Project's less than significant construction air emissions impacts and less than significant with mitigation incorporated localized construction emissions impacts would be further reduced.

While this alternative would generate approximately 408 fewer average daily trips compared to the Project, it would generate more truck trips as an industrial development and may include stationary sources that generate more total emissions than the Project. Therefore, the Project's long-term operational air emissions associated with mobile and stationary sources would be greater under this alternative. Weighing both short-term construction and long-term operational air emissions impacts, the Light Industrial Alternative would be neither environmentally superior nor inferior to the Project.



Greenhouse Gas Emissions

Based on Table 5.10-1, *Projected Annual Greenhouse Gas Emissions*, the Project would generate approximately 2,584 metric tons carbon dioxide equivalent per year (MTCO₂eq/yr) and would not exceed the 3,000-MTCO₂eq/yr significance threshold. While this alternative would generate more truck trips and may include more stationary sources that generate more GHG emissions with development of industrial use, this alternative would be less dense and generate fewer vehicle trips overall. Thus, GHG emissions associated with this alternative would be reduced compared to the Project. Overall, the Project's less than significant impacts to GHG emissions would be further reduced and this alternative would be environmentally superior to the Project.

Noise

Compared to the Project, short-term noise impacts from demolition, grading, and construction activities associated with this alternative would be reduced given that this alternative is much less dense and would not require construction of a three-story parking garage. Therefore, less than significant with mitigation incorporated short-term noise impacts associated with the Project would be reduced under this alternative.

Under this alternative, more truck trips and stationary noise sources (e.g., industrial equipment use and truck loading) would be generated in comparison to the Project. Thus, this alternative would result in greater operational noise impacts from mobile and stationary noise sources. Weighing both short- and long-term noise impacts, this alternative is considered neither environmentally superior nor inferior to the Project.

Public Services and Utilities

Compared to the Project, impacts related to fire and police services under the Light Industrial Alternative would be slightly reduced given that industrial development would impact these services to a lesser extent in comparison to a senior living community that may require emergency services under various circumstances (e.g., rides to the hospital and doctor's offices and ambulance services).

Water, wastewater, and solid waste generation on-site would be proportional to the proposed land use type. As analyzed in Section 5.12, *Public Services and Utilities*, Specific Plan operations would generate up to 73,920 gallons per day of wastewater and have an estimated water demand of 54.30 acre-feet per year. Utilizing a wastewater generation rate of 25 gallons per 1,000-square foot,⁷ this alternative would generate approximately 1,708 gallons per day of wastewater, which is substantially less than the proposed Project. It can also be assumed that water demand and solid waste generation associated with this alternative would also be substantially reduced given the reduction in development density. As such, the less than significant public services and utilities impacts identified under the Project would be further reduced under this alternative. Overall, this Alternative is considered environmentally superior to the Project.

⁷ Sanitation Districts of Los Angeles County, *Table 1 Loadings for Each Class of Land Use*, <http://www.lacsd.org/civicax/filebank/blobload.aspx?blobid=3531>, accessed September 5, 2018.



ABILITY TO MEET PROJECT OBJECTIVES

The Light Industrial Alternative would not develop a residential community, and thus, would not achieve several Project objectives. This alternative would not provide an amenity-rich senior housing residential community or help the City meet its RHNA requirements (Objective Nos. 1, 2, and 3). Additionally, this alternative would not result in a fiscal benefit to the City whereby revenues from the new community exceed public expenditures needed to serve and maintain a residential community (Objective No. 6).

However, the Light Industrial Alternative would integrate well within existing industrial uses in the Site vicinity and could be developed with attractive architecture and include outdoor spaces and landscaping that establish a distinct and harmonizing character (Objective Nos. 4 and 5). Additionally, a light industrial development would also be required to provide public infrastructure improvements to support its use and would continue to provide connectivity for golf play between golf holes to the north and south of West Sierra Madre Avenue (Objective Nos. 7 and 8).

7.6 “MULTI-FAMILY RESIDENTIAL” ALTERNATIVE

DESCRIPTION OF ALTERNATIVE

The Multi-Family Residential Alternative would consist of two components: 1) developing the northern 4.48-acre area with 121 market-rate multi-family residential units at a density of 27 dwelling units per acre (Multi-Family Area); and 2) reconfiguring the southern 14.88-acre portion of the existing golf course to accommodate golf holes 3, 4, 5, and 6 (Golf Course Reconfiguration Area; similar to the proposed Project). It is assumed the Multi-Family Area would include some degree of hardscape and landscape improvements (e.g., pedestrian walkways, landscaped areas). The Specific Plan would not be adopted, and the Senior Village and three-story parking garage would not be developed.

This alternative was selected to analyze a scenario in which a residential development would be developed similar to the Site’s neighboring residential uses, such as the Rancho Azusa single-family residences and Le Med Apartment Homes to the north and the Sierra Village single-family residences to the east.

The following discussion evaluates the potential environmental impacts associated with the Multi-Family Residential Alternative, as compared to impacts from the Project. As both this alternative and the Project would reconfigure the existing golf course in the Golf Course Reconfiguration Area, the following analysis focuses predominantly on the changes to the northern portion of the Site (referred to as the Multi-Family Area for the purposes of this alternative discussion).

IMPACT COMPARISON TO THE PROPOSED PROJECT

Land Use and Relevant Planning

Under this alternative, 121 multi-family residential units would be developed in the Multi-Family Area, which would require a General Plan Amendment to change the land use designation from Open Space to Moderate Density Residential (15.1 to 27 units per net acre), and a Zone Change to



change the zoning from Recreation to Moderate Density Residential. Similar to the Project, a Tentative Tract Map to subdivide the Multi-Family Area and Golf Course Reconfiguration Area would still be required and the proposed golf course reconfiguration would still require approval of a golf course reconfiguration plan, Tentative Tract Map, and Design Review. Thus, the Multi-Family Residential Alternative would require similar entitlement approvals from the City as the proposed Project, and this alternative would be neither environmentally superior nor inferior to the Project regarding land use and relevant planning.

Aesthetics/Light and Glare

Short-term visual impacts associated with demolition, grading, and construction activities that would occur with the Project would similarly occur with the Multi-Family Residential Alternative. However, construction duration is anticipated to be shorter as this alternative would construct 132 fewer residential units and would not require construction of a three-story parking garage. Thus, construction-related impacts to the visual character/quality of the area would be reduced.

The long-term visual character of the Multi-Family Residential Area would be similar to the Project's Senior Village, since multi-family housing would be developed. Development of the multi-family units would be required to comply with Moderate Density Residential zoning development standards, including the appropriate setbacks, building height, signage, landscaping, etc. Similarly, the proposed Specific Plan would require the Senior Village be developed in a manner that complies with specific development standards and design guidelines. As such, development of this alternative and the Project would result in similar less than significant visual character and quality impacts. Both this alternative and the Project would have no impact to scenic views and vistas, and light and glare impacts under both scenarios would be similar.

Overall, this alternative is considered neither environmentally superior nor inferior in comparison to the Project given that the Site's visual character and quality and light and glare would be altered in a similar manner.

Biological Resources

The development footprint for the Multi-Family Alternative and proposed Project would be the same. As such, similar to the Project, this alternative would have no impact on special status plant and wildlife species and sensitive vegetation communities. Additionally, construction impacts on migratory birds and 200 protected trees would be reduced to less than significant levels with mitigation incorporated. This alternative would be neither environmentally superior nor inferior to the Project regarding potential impacts to biological resources, given it would involve similar ground-disturbing activities within the same development area.

Tribal and Cultural Resources

This alternative would require similar grading and site preparation to develop the 121 multi-family units. Thus, the potential to impact previously undiscovered cultural and tribal cultural resources would be similar to the Project and this alternative would neither be environmentally superior nor inferior to the proposed Project.



Geology and Soils

Given that the development footprint would remain the same under the Project and the Multi-Family Residential Alternative, none of the Site-specific geologic conditions and hazards would be altered under this alternative. Thus, this alternative would have similar impacts related to geology and soils and would be neither environmentally superior nor inferior to the Project.

Hydrology and Water Quality

Similar to the Project, this alternative would require grading and excavation within the Site that would expose soils to wind and water erosion. This alternative would also require similar National Pollutant Discharge Elimination System compliance measures to reduce water quality impacts to a less than significant level. Although construction would likely take a shorter period of time, the overall development footprint would be the same as the Project. As such, short-term construction impacts would be similar under both scenarios.

The Project would implement stormwater drainage infrastructure and associated water quality BMPs to minimize impacts during long-term operations. It is expected that a similar range of improvements would be required under this alternative through a project-specific Stormwater Pollution Prevention Plan and Water Quality Management Plan. Thus, the less than significant hydrology and water quality impacts identified under the Project would be similar under this alternative.

As such, this alternative would be neither environmentally superior or inferior to the Project regarding hydrology and water quality.

Hazards and Hazardous Materials

Similar to the Project, construction activities associated with the Multi-Family Residential Alternative could release hazardous materials into the environment through reasonably foreseeable upset and accident conditions. However, this alternative would likely require a shorter construction period and less overall construction (132 fewer residential units and no parking garage). As such, less than significant impacts (with mitigation incorporated) related to hazards and hazardous materials utilized during construction would be reduced in comparison to the Project.

Long-term operational impacts regarding the transport, use, and/or storage of hazardous materials would be less under this alternative as no medical facilities would be in operations. Thus, the less than significant operational impacts related to hazardous materials would be reduced under this alternative.

Overall, this alternative would be environmentally superior to the Project given that less hazardous materials would be utilized during construction and operations.

Traffic and Circulation

Construction traffic associated with this alternative would likely be reduced compared to the Project since 132 fewer residential units and no parking garage would be constructed. This alternative would likely require a shorter construction period and fewer vehicular and truck trips during the



construction period. Therefore, the Project’s less than significant with mitigation incorporated short-term construction traffic impacts would be further reduced under this alternative.

Based on the ITE Trip Generation Manual, a 121-unit multi-family development would generate approximately 886 average daily trips with 56 a.m. peak hour trips and 68 p.m. peak hour trips. In comparison, the Project would generate 837 average daily trips with 48 a.m. peak hour trips and 62 p.m. peak hour trips. Comparatively, this alternative would increase average daily trips by 49 trips and increase morning and evening peak hour trips by 8 and 6 trips, respectively. Thus, this alternative would increase overall traffic generation and increase impacts to study area intersections. A sensitivity analysis was also conducted for the Multi-Family Residential Alternative for the intersections of Irwindale Avenue/Foothill Boulevard and Todd Avenue/Foothill Boulevard was conducted for future cumulative conditions in year 2022. As shown in Table 7-2, Multi-Family Alternative Year 2022 Peak Hour Intersection Capacity Analysis, this alternative would not result in a significant impact at either of the two key intersections.

**Table 7-2
Multi-Family Alternative Year 2022 Peak Hour Intersection Capacity Analysis**

Key Intersections	Time Period	Existing Conditions		Year 2022 Without Alternative Conditions		Year 2022 Plus Alternative Conditions		Significant Impact	
		ICU/HCM	LOS	ICU/HCM	LOS	ICU/HCM	LOS	Increase	Yes/No
1 Irwindale Avenue at Foothill Boulevard	a.m.	0.820	D	0.940	E	0.942	E	0.002	No
	p.m.	0.938	E	1.182	F	1.188	F	0.006	No
2 Todd Avenue at Foothill Boulevard	a.m.	0.773	C	0.953	E	0.963	E	0.010	No
	p.m.	0.667	B	0.833	D	0.836	D	0.003	No

Notes:
Bold LOS values indicate adverse service levels based on City LOS standards
 s/v = seconds per vehicle (delay)
 ICU = Intersection Capacity Utilization
 HCM = Highway Capacity Manual

However, this alternative would still generate more peak hour trips compared to the Project and could have a greater impact on the Project driveway’s peak hour LOS and queueing storage along North Todd Avenue. Thus, operational traffic and circulation impacts would be greater under this alternative. This alternative would be environmentally inferior to the Project regarding traffic and circulation impacts due to increased traffic volumes.

Air Quality

Construction-related air emissions would be reduced under this alternative compared to the proposed Project as 132 fewer residential units would be constructed. No parking garage is proposed under this alternative either. Therefore, the Project’s less than significant construction air emissions impacts and less than significant with mitigation incorporated localized construction emissions impacts would be further reduced.



However, as stated above, the Multi-Family Residential Alternative would generate 49 additional average daily trips compared to the Project and thus, would increase operational mobile air quality emissions. Therefore, the Project's long-term operational air emissions would be greater under this alternative.

Weighing both short- and long-term air emissions impacts, the Multi-Family Residential Alternative would be neither environmentally superior or inferior to the Project.

Greenhouse Gas Emissions

As stated above, the construction duration of this alternative would likely be reduced compared to the Project as fewer residential units would be developed and no parking garage is proposed. Thus, GHG emissions from construction activities would be reduced. However, this alternative would increase average daily trips and associated GHG emissions. Thus, weighing both short- and long-term GHG emissions impacts, the Multi-Family Residential Alternative would be neither environmentally superior or inferior to the Project.

Noise

Short-term noise impacts from demolition, grading, and construction activities associated with this alternative would be reduced given that this alternative would develop 132 fewer residential units and would not require construction of a three-story parking garage. Therefore, less than significant with mitigation incorporated short-term noise impacts associated with the Project would be reduced under this alternative.

However, the multi-family development would increase average daily trips and associated long-term operational noise impacts in comparison to the Project. This alternative would generate 49 more average daily trips that would increase ambient noise levels in the Site vicinity.

Weighing both short- and long-term air emissions impacts, the Multi-Family Residential Alternative would be neither environmentally superior or inferior to the Project.

Public Services and Utilities

Based on an average household size of 3.49 persons for the City of Azusa⁸, the 121 multi-family units proposed under this alternative would introduce up to 422 permanent residents. In comparison, the Senior Village would introduce 303 permanent senior residents. Since more permanent residents would reside on-site, this alternative would increase demand for fire and police services compared to the Project. In addition, the introduction of 422 permanent residents under this alternative would increase demands for park, school, and library services beyond those of the proposed Project. Overall, impacts on fire, police, park, school, and library services would be greater under this alternative.

Water, wastewater, and solid waste generation on-site would be proportional to the proposed land use type. As analyzed in [Section 5.12, *Public Services and Utilities*](#), Specific Plan operations would generate up to 73,920 gallons per day of wastewater and have an estimated water demand of 54.30

⁸ Ibid.



acre-feet per year. Utilizing a wastewater generation rate of 156 gallons per dwelling unit,⁹ this alternative would generate approximately 18,876 gallons per day of wastewater, which is substantially less than the proposed Project. While this alternative would have 119 additional permanent residents than the Project, it would generate less wastewater because multi-family residential use has a lower generation rate than the Senior Village, and this alternative would not include the Project's employees, senior care services, and luxury amenities that further increase utility generation and demand. Therefore, it can also be assumed that water demand and solid waste generation associated with this alternative would also be reduced given the reduction in development density.

Overall, development of the Multi-Family Residential Alternative would increase demand for fire, police, school, park, and library services but would reduce demand for utilities services, including water, wastewater, and solid waste services. Thus, this alternative would be neither environmentally superior nor inferior to the proposed Project.

ABILITY TO MEET PROJECT OBJECTIVES

The Multi-Family Residential Alternative would not provide senior housing within Azusa (Objective No. 1). However, this alternative would provide housing that helps the City meet its RHNA requirements and integrates with existing residential developments in the Site vicinity (Objective Nos. 2 and 4). The community could be developed with rich amenities and architecturally attractive buildings with outdoor spaces and landscaping (Objective Nos. 3 and 5). Additionally, this alternative would develop a residential community that provides fiscal benefits to the City and be required to provide public infrastructure improvements to support its use (Objective Nos. 6 and 7). Lastly, this alternative would continue to provide connectivity for golf play between golf holes to the north and south of West Sierra Madre Avenue (Objective No. 8).

7.7 “ENVIRONMENTALLY SUPERIOR” ALTERNATIVE

Table 7-3, *Comparison of Alternatives*, summarizes the comparative analysis presented above (i.e., the alternatives compared to the Project). Review of Table 7-3 indicates the No Project Alternative is the environmentally superior alternative, as it would avoid or lessen the majority of impacts associated with development of the Project. However, it should be noted that no significant and unavoidable impacts have been identified for the Project. Per *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.” Accordingly, the Light Industrial Alternative is identified as the environmentally superior alternative.

The Light Industrial Alternative would not develop a residential community, and thus, would not achieve several Project objectives. This alternative would not provide an amenity-rich senior housing residential community that would help the City meet its RHNA requirements (Objective Nos. 1, 2, and 3). Additionally, this alternative would not result in a fiscal benefit to the City whereby revenues from the new community exceed public expenditures needed to serve and maintain a residential community (Objective No. 6).

⁹ Sanitation Districts of Los Angeles County, *Table 1 Loadings for Each Class of Land Use*, <http://www.lacsd.org/civicax/filebank/blobload.aspx?blobid=3531>, accessed September 5, 2018.



However, the Light Industrial Alternative would integrate well within existing industrial uses in the Site vicinity and could be developed with attractive architecture and include outdoor spaces and landscaping that establish a distinct and harmonizing character (Objective Nos. 4 and 5). Additionally, a light industrial development would also be required to provide public infrastructure improvements to support its use and would continue to provide connectivity for golf play between golf holes to the north and south of West Sierra Madre Avenue (Objective Nos. 7 and 8).

**Table 7-3
Comparison of Alternatives**

Sections	No Project Alternative	Light Industrial Alternative	Multi-Family Residential Alternative
Land Use and Relevant Planning	∨	=	=
Aesthetics/Light and Glare	∨	=	=
Biological Resources	∨	=	=
Tribal and Cultural Resources	∨	=	=
Geology and Soils	∨	=	=
Hydrology and Water Quality	=	=	=
Hazards and Hazardous Materials	∨	=	∨
Traffic and Circulation	∨	△	△
Air Quality	∨	=	=
Greenhouse Gas Emissions	∨	∨	=
Noise	∨	=	=
Public Services and Utilities	∨	∨	=
△ Indicates an impact that is greater than the Project (environmentally inferior). ∨ Indicates an impact that is less than the Project (environmentally superior). = Indicates an impact that is equal to the Project (neither environmentally superior nor inferior).			



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