CHAPTER 6
Alternatives Analysis

6.1 Introduction

According to the California Environmental Quality Act (CEQA) Guidelines, an Environmental Impact Report (EIR) must describe a reasonable range of alternatives to a proposed project that could feasibly attain most of the basic project objectives, and would avoid or substantially lessen any of the proposed project's significant environmental effects. This alternatives analysis summarizes the alternatives screening process conducted to identify feasible alternatives to the proposed Enhanced Watershed Management Programs (EWMPs). Information to select an "environmentally superior alternative," which may be the proposed program, is also provided in this chapter.

Section 15126.6(f) of the CEQA Guidelines provides direction on the required alternatives analysis:

> "The range of alternatives required in an EIR is governed by a 'rule of reason' that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making."

An EIR need not consider every conceivable alternative to a project. Rather, the alternatives must be limited to ones that meet the project objectives, are feasible, and would avoid or substantially lessen at least one of the significant environmental effects of the project. "Feasible" means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors. Section 15126.6(b) of the CEQA Guidelines states that an EIR:

> "... must identify ways to mitigate or avoid the significant effects that a project may have on the environment, the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or could be more costly."

Section 15126.6 (d) of the CEQA Guidelines provides further guidance on the extent of alternatives analysis required:

> "The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. A matrix displaying the major characteristics and significant environmental effects of each alternative may be used to summarize the comparison. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed."

The EIR must briefly describe the rationale for selection and rejection of alternatives and the information the Lead Agency relied on when making the selection. It also should identify any alternatives considered but rejected as infeasible by the lead agency during the scoping process and briefly explain the reasons for the exclusion. Alternatives may be eliminated from detailed consideration in the EIR if they fail to meet most of the project objectives, are infeasible, or do not avoid any significant environmental effects.

Section 15126.6(e)(1) of the CEQA Guidelines also requires that the "no project" alternative be addressed in this analysis. The purpose of evaluating the "no project" alternative is to allow decision-makers to compare the potential consequences of the proposed program with the consequences that would occur without implementation of the proposed program.

Finally, an EIR must identify the environmentally superior alternative. The "no project" alternative may be environmentally superior to the proposed program based on the minimization or avoidance of physical environmental impacts. However, the "no project" alternative must also achieve the project objectives in order to be selected as the environmentally superior alternative. CEQA Guidelines Section 15126.6(e)(1) requires that if the environmentally superior alternative is the "no project" alternative, the EIR shall identify an environmentally superior alternative among other alternatives.

6.2 Review of Proposed Program Goals and Objectives

The alternatives presented in this chapter were analyzed for their abilities to reduce significant program impacts and meet the objectives of the proposed program, which are:

- To collaborate among agencies (Permittee jurisdictions) across the watershed to promote more cost-effective and multi-beneficial water quality improvement projects to comply with the Municipal Separate Storm Sewer System (MS4) Permit.
- To develop watershed-wide Enhanced Watershed Management Programs (EWMPs) that would, once implemented, remove or reduce pollutants from dry- and wet-weather urban runoff in a cost-effective manner.
- To reduce the impact of stormwater and non-stormwater on receiving water quality.

6.3 Review of Significant Environmental Impacts

CEQA Guidelines Sections 21100(b) (2) and 15126.2(b) require that any significant and unavoidable effect on the environment must be identified. In addition, CEQA Guidelines 15093(a) allows the decision-making agency to determine if the benefits of a proposed project outweigh the unavoidable adverse environmental impacts of implementing the project. The Lead Agency can approve a project with unavoidable adverse impacts if it prepares and adopts a "Statement of Overriding Considerations" setting forth the specific reasons for making such a judgment. Unavoidable adverse impacts identified in this Program Environmental Impact Report (PEIR) are discussed in this section. For each of the unavoidable adverse impacts, the Los Angeles County Flood Control District (LACFCD) must prepare and adopt a Statement of Overriding Considerations if the program is approved.

Chapters 3 and 4 provide analyses of potentially significant impacts that could result from implementation of the proposed program. **Table 6-1** identifies the potentially significant and unavoidable impacts associated with implementation of the proposed program. The range of alternatives required to be evaluated in an EIR is limited to those alternatives that would avoid or substantially lessen any significant effects of the proposed program and could feasibly attain most of the program objectives.

6.4 Program-Level Alternatives Analysis

In accordance with the CEQA "rule of reason," an EIR is required to consider a range of alternatives that permit a reasoned choice and that are "limited to ones that would avoid or substantially lessen any of the significant effects of the project" (CEQA Guidelines Section 15126.6(f)). The Lead Agency conducted an alternatives screening process to identify feasible alternatives to the proposed program. The screening process for identifying viable alternatives included consideration of the following criteria:

- Ability to meet the program objectives
- Ability to reduce significant environmental effects of the proposed program
- Economic and engineering feasibility

Based on these criteria, the Lead Agency has identified the following alternatives:

- No Program Alternative
- Non-Structural Best Management Practices (BMPs) Only Program Alternative
- Distributed Structural BMPs Only Program Alternative (no centralized and regional)

TABLE 6-1
SUMMARY OF PROGRAM IMPACT ANALYSIS

Issue Area	Significance Determination
Aesthetics	LSM
Air Quality (Construction)	**SU**
Air Quality (Operation)	LTS
Air Quality (Cumulative Construction)	**SU**
Biological Resources (Direct and Cumulative)	LSM
Cultural Resources	**SU**
Cultural Resources (Cumulative)	**SU**
Geology and Soils/Mineral Resources (Direct and Cumulative)	LSM
Greenhouse Gas Emissions	LTS
Hazards and Hazardous Materials (Direct and Cumulative)	LSM
Hydrology and Water Quality (Direct and Cumulative)	LSM
Land Use and Planning/Agriculture (Direct and Cumulative)	LTS
Noise (Construction)	**SU**
Noise (Operation)	LTS
Noise (Cumulative)	**SU**
Population and Housing and Environmental Justice (Direct and Cumulative)	LTS
Public Services/Recreation (Direct and Cumulative)	LTS
Traffic and Transportation (Direct and Cumulative)	LSM
Utilities and Service Systems (Direct and Cumulative)	LSM
Growth Inducement (Direct/Indirect)	LTS

LTS = Less than Significant
LSM = Less than Significant with Mitigation
SU = Significant and Unavoidable

SOURCE: ESA 2014.

6.4.1 No Program Alternative

The CEQA Guidelines require an analysis of the specific alternative of "no project" (CEQA Guidelines, Section 15126.6). Specifically, the CEQA Guidelines state that "[t]he purpose of describing and analyzing a 'no project' alternative is to allow decision makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project." The "no project" alternative is not necessarily the same as the baseline used to determine the environmental impacts of the proposed program. The analysis of the no project alternative includes the existing baseline environmental 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" (CEQA Guidelines, Section 15126.6 (e)(2)). The analysis of impacts related to the no project alternative includes projecting what would reasonably be expected to occur "in the foreseeable future if the project were not approved."

The No Program Alternative (please note: for the sake of this EWMP, this PEIR will use the term "No Program Alternative") would result in the non-implementation of the EWMP approach allowed in the MS4 Permit. Although this would not necessarily result in noncompliance with MS4 Permit since preparation of the EWMPs is an optional compliance method, each Permittee would be required to reach water quality objectives for MS4 discharges on their own, with no clear compliance strategy. The collaborative approach outlined in the MS4 Permit would not be available to each Permittee. Under the No Project Alternative, each Permittee would construct BMPs necessary to achieve compliance, some of which would be similar to the proposed alternative. This includes the construction of distributed, centralized, and regional BMPs necessary to achieve local discharge compliance.

Ability to Meet Program Objectives

The No Program Alternative would not meet the EWMP objective to collaborate among agencies across the watershed to promote more cost-effective and multi-beneficial water quality improvement projects, but it would meet the other objectives to remove or reduce pollutants from dry- and wet-weather urban runoff and reduce the impact of stormwater and non-stormwater on receiving water quality through implementation of structural and non-structural BMPs.

The No Project Alternative would not necessarily avoid the potential environmental impacts that would occur as a result of implementing the EWMPs, as compliance with the MS4 Permit is still required. However, to achieve compliance with the MS4 Permit, each of the BMPs would need to be installed rapidly to avoid permit violations. There would be less coordination within each watershed, which could result in inefficient or redundant BMPs based on municipal boundaries rather than watershed boundaries. Potential impacts of this alternative are discussed in the following pages.

Aesthetics

Under the No Project Alternative, each Permittee would implement BMPs within their jurisdictions that would result in aesthetic modifications similar to the proposed alternative. The impacts to aesthetics throughout the watershed would be site specific, similar to the proposed alternative. [Similar impacts]

Air Quality

Air emissions resulting from the construction of BMPs under the No Project Alternative would be similar to the proposed alternative since both alternatives would require installation of similar types of BMPs requiring similar types of construction methods. However, because the programs would need to be installed rapidly and because more BMPs would likely be required as a result of the inefficiencies of municipal boundaries, slightly more construction emissions would result. [Slightly greater impacts]

Biological Resources

Impacts to biological resources would be similar to the proposed alternative. The potential impacts to biological resources throughout the watershed would be site specific, but the BMP locations would be similar to those identified under the proposed alternative. [Similar impacts]

Cultural Resources

Impacts to cultural resources would be similar to the proposed alternative. The potential impacts to cultural resources throughout the watershed would be site specific, but the BMP locations would be similar to those identified under the proposed alternative. [Similar impacts]

Geology and Soils/Mineral Resources

Impacts to geological and mineral resources would be similar to the proposed alternative since impacts would be site specific and within similar locations. [Similar impacts]

Greenhouse Gases

Construction of the BMPs would result in only minor greenhouse gas (GHG) emissions. GHG emissions would be similar to the proposed alternative since similar BMPs would be constructed. In terms of the cumulative impact to global climate change, the impact would be similar to the proposed alternative. [Similar impacts]

Hazards and Hazardous Waste

Impacts to hazards and hazardous waste would be similar to the proposed alternative since impacts would be site specific and within similar locations. Localized subsurface contamination could be affected by any of the BMP types and individual projects would be subject to similar preconstruction evaluations to assess suitability of the location. [Similar impacts]

Hydrology and Water Quality

Achieving water quality objectives required in the MS4 Permit immediately would be difficult under the No Program Alternative since the permit does not allow for an installation grace period outside of the EWMP. The potential for noncompliance with the MS4 Permit under this alternative would result in a significant impact compared to that of the proposed alternative. [Greater impacts]

Land Use Planning/Agriculture

Impacts to land use would be similar to the proposed alternative since impacts would be site specific and within similar locations. [Similar impacts]

Noise

Noise resulting from the construction of BMPs under the No Project Alternative would be similar to the proposed alternative since both alternatives would require installation of similar types of BMPs requiring similar types of construction methods in similar locations. [Similar impact]

Population and Housing

Impacts to population and housing would be similar to the proposed alternative since impacts would be site specific and within similar locations. [Similar impact]

Recreation

Impacts to recreation would be similar to the proposed alternative since impacts would be site specific and within similar locations. [Similar impact]

Transportation and Circulation

Impacts to transportation and circulation would be similar to the proposed alternative since impacts would be site specific and within similar locations. [Similar impacts]

Utilities and Service Systems

Impacts to utilities and service systems would be similar to the proposed alternative since impacts would be site specific and within similar locations. [Similar impacts]

6.4.2 Non-Structural BMPs Only Project Alternative

The Non-Structural BMPs Only Project Alternative would involve implementation of the proposed program and its associated non-structural BMPs only. No structural BMPs would be implemented as the significant and unavoidable impacts are generally related to construction activities associated with the structural BMPs. For example, the significant and unavoidable air quality, noise, and cultural resources impacts would be avoided through implementation of non-structural BMPs only because non-structural BMPs would not result in construction activities.

The proposed program would focus on implementation of policies, actions, and activities that are intended to prevent pollutants from entering stormwater runoff, thus eliminating the source of the pollutants.

Ability to Meet Program Objectives

The Non-Structural BMPs Only Project Alternative would avoid the potential environmental impacts that would occur as a result of implementing the proposed program. While these measures would help to improve water quality in the EWMP areas, sole reliance on these non-structural BMPs may not provide the level of water quality treatment needed to meet the water quality objectives of the Regional Water Quality Control Board Basin Plan and as required by the MS4 Permit. The Non-Structural BMPs Only Project Alternative may not meet the objectives of the proposed program to collaborate among agencies to promote more cost-effective and multi-beneficial water quality improvement projects because Non-Structural BMPs are generally implemented individually in each jurisdiction, so collaboration efforts for cost-effective solutions diminishes with implementation of non-structural BMPs only. Nonetheless, potential impacts of this alternative are discussed in the following pages.

Impact Analysis

Aesthetics

The Non-Structural BMPs Only Project Alternative would avoid construction impacts identified in the proposed alternative. However, many BMPs, such as green-streets and grassy swales, would improve local aesthetics. The Non-Structural BMPs Only Project Alternative would minimize this multi-purpose benefit of the project. [Greater impacts]

Air Quality

The Non-Structural BMPs Only Project Alternative would avoid construction impacts identified in the proposed alternative. The elimination of construction emissions throughout the region would result in the use of fewer off-road vehicles and fewer emissions. [Fewer impacts]

Biological Resources

The Non-Structural BMPs Only Project Alternative would avoid direct impacts to biological resources from construction. Although dry-weather flows would be reduced under this alternative, relying solely on non-structural BMPs would be less effective than the combination of BMPs planned in the proposed alternative. Impacts to biological resources would be less under the Non-Structural BMPs Only Project Alternative. [Fewer impacts]

Cultural Resources

The Non-Structural BMPs Only Project Alternative would avoid construction impacts, resulting in fewer impacts to cultural resources. [Fewer impacts]

Geology and Soils/Mineral Resources

The Non-Structural BMPs Only Project Alternative would avoid construction impacts and infiltration impact, resulting in fewer impacts to geological resources. The potential for increased unstable soils from infiltration would be reduced under this alternative. [Fewer impacts]

Greenhouse Gases

The Non-Structural BMPs Only Project Alternative would avoid construction impacts identified in the proposed alternative. The elimination of construction emissions throughout the region would result in fewer GHG emissions. [Fewer impacts]

Hazards and Hazardous Waste

The Non-Structural BMPs Only Project Alternative would avoid construction impacts and infiltration impact, resulting in fewer impacts to hazards. The potential for increased mobilization of contamination in soils would be reduced under this alternative. [Fewer impacts]

Hydrology and Water Quality

The water quality benefit provided by the structural BMPs would be eliminated under this alternative. Achieving water quality objectives required in the MS4 Permit with no structural

BMPs would be unlikely. The potential for non-compliance with the MS4 Permit under this alternative would result in a significant impact of the alternative. [Greater impacts]

Land Use Planning/Agriculture

The Non-Structural BMPs Only Project Alternative would avoid construction impacts and infiltration impact, resulting in fewer impacts to land uses and agriculture. [Fewer impacts]

Noise

The Non-Structural BMPs Only Project Alternative would avoid construction impacts and infiltration impact, resulting in fewer impacts to noise. [Fewer impacts]

Population and Housing

The avoidance of construction would not affect population and housing. Impacts would be similar to the proposed alternative. [Similar impacts]

Recreation

The avoidance of construction would not affect recreation. Impacts would be similar to the proposed alternative. [Similar impacts]

Transportation and Circulation

The avoidance of construction would reduce impacts to transportation and circulation. Impacts would be less than the proposed alternative. [Fewer impacts]

Utilities and Service Systems

The avoidance of construction and increased infiltration would reduce impacts to utilities and service systems. Impacts would be less than the proposed alternative. [Fewer impacts]

6.4.3 Distributed Structural and Non-Structural BMPs Only Program Alternative (No Centralized or Regional)

The Distributed Structural BMPs Only Project Alternative would involve implementation of the proposed program and only its associated distributed structural BMPs and non-structural BMPs. Since much of the impacts of program implementation would occur during construction of the large-scale regional and centralized BMPs, this alternative would result in fewer construction impacts than the proposed project.

Ability to Meet Program Objectives

The Distributed Structural BMPs Only Program Alternative would meet the objectives of the proposed program to collaborate among agencies to promote more cost-effective and multi-beneficial water quality improvement projects. However, because distributed structural BMPs tend to be smaller in nature and typically are distributed widely throughout the watershed, more BMPs may be necessary to meet water quality objectives in the MS4 Permit. The ability to meet

the water quality objectives would be less certain under this alternative. Potential impacts of this alternative are discussed in the following pages.

Impact Analysis

Aesthetics

Constructing more distributed BMPs and no large-scale regional or centralized BMPs would result in similar aesthetics impacts on the regional level within each watershed. Although more widely dispersed projects would result in more locations being subjected to short-term construction activities, post-construction impacts would largely be beneficial, since green-streets and small-scale grassy swales would be installed that generally would improve local character in urban settings. In addition, any adverse post-construction impacts to local aesthetics from the larger BMPs would be avoided. [Fewer impacts]

Air Quality

Constructing fewer large-scale BMPs would result in fewer daily emissions. Although construction of more widely dispersed small-scale BMPs may increase the number of construction projects, the smaller size would result in the use of fewer off-road vehicles and fewer emissions. [Fewer impacts]

Biological Resources

Constructing fewer large-scale BMPs would result in impacts similar to biological resources as the proposed alternative. Impacts to biological resources from construction of BMPs would be site specific regardless of the type of program being implemented. The potential to reduce surface flows supporting riparian and wetland resources would be similar to the proposed alternative. [Similar impacts]

Cultural Resources

Constructing fewer large-scale BMPs, but more small-scale BMPs would have similar impacts to cultural resources as the proposed alternative. Impacts to cultural resources would be site specific regardless of the type of project being implemented. [Similar impacts]

Geology and Soils/Mineral Resources

Impacts to geological and mineral resources would be similar to the proposed alternative since impacts would be site specific regardless of the type of BMPs being built. [Similar impacts]

Greenhouse Gases

Construction of the BMPs would result in only minor GHG emissions. Constructing fewer large-scale BMPs would result in fewer GHG emissions overall, but in terms of the cumulative impact to global climate change, the impact would be similar to the proposed alternative. [Similar impacts]

Hazards and Hazardous Waste

Impacts to hazards and hazardous waste would be similar to the proposed alternative since impacts would be site specific regardless of the type of BMPs being built. Localized subsurface contamination could be affected by any of the BMP types and individual projects would be subject to similar preconstruction evaluations to assess suitability of the location. [Similar impacts]

Hydrology and Water Quality

The water quality benefit provided by the large-scale regional BMPs would be eliminated under this alternative. Achieving water quality objectives required in the MS4 Permit with a greater number of small-scale BMPs may be unlikely if larger regional BMPs are not constructed. The potential for noncompliance with the MS4 Permit under this alternative would result in a significant impact compared to that of the proposed alternative. [Greater impact]

Land Use Planning/Agriculture

Construction of a greater number of BMPs would have greater impacts to land uses within each watershed since more projects would be required. The large-scale BMPs would be located in areas with sufficient developable space. Eliminating use of these large open-space areas would disperse land use acquisition and compatibility impacts throughout the watershed. Impacts would be greater under this alternative. [Greater impacts]

Noise

Construction of more BMPs would subject a greater number of people to temporary construction noise. However, impacts from the longer-term construction of large BMPs would be avoided. Since impacts would be site specific, impacts from construction noise would be similar to the proposed alternative. [Similar impacts]

Population and Housing

Construction of more small-scale BMPs and fewer large-scale BMPs would have similar effects to population and housing as the proposed alternative. [Similar impacts]

Recreation

Construction of more small-scale BMPs and fewer large-scale BMPs would have similar effects to recreation within the watersheds. Impacts would be site specific under either alternative. [Similar impacts]

Transportation and Circulation

Construction of more small-scale BMPs and fewer large-scale BMPs would have similar effects to transportation and circulation within the watersheds. Smaller projects would have shorter duration impacts to roadways, but would occur in more locations. Impacts would be site specific under either alternative. [Similar impacts]

Utilities and Service Systems

Construction of more small-scale BMPs and fewer large-scale BMPs would have similar effects to utilities and service systems as the proposed alternative. Construction impacts would be site specific. [Similar impacts]

6.5 Comparison of Alternatives

This section provides a summary comparison of the alternatives relative to the proposed program, with respect to their ability to meet program objectives and their relative environmental impacts compared to the proposed program. **Table 6-2** summarizes the ability of the proposed program, the No Program Alternative, the Non-Structural BMPs Only Project Alternative, and the Distributed Structural and Non-Structural BMPs Only Project Alternative to meet the program objectives; it also summarizes the environmental impacts of these alternatives relative to the proposed program.

6.6 Alternatives Suggested in Scoping

Several alternatives were suggested in comment letters received during the Notice of Preparation (NOP) Scoping process. These comments are included in Appendix A. One comment letter from Dr. Tom Williams representing the Sierra Club suggested that the PEIR include an assessment of several funding mechanism alternatives, including: Single Parcel Fee Assessment, Parcel Area Fee Assessment, Hybrid Parcel Area Fee Assessment, Zero Discharge Assessment, and Large Parcel Assessment. These suggested alternatives would not lessen any significant environmental impacts of the Program and were therefore not considered in this PEIR. Although CEQA allows for discussion of economic impacts and project costs as measures of feasibility, the funding mechanisms required to implement projects are generally not susceptible to environmental analysis. For these reasons, these suggested alternatives were not evaluated as program alternatives for CEQA compliance.

In addition to the fee assessment alternatives, the comment suggested a Full Capture and Recharge of Flows Greater than 100 cfs Alternative. This suggested alternative was rejected from further consideration because of the infeasibility of capturing all storm flows in Los Angeles County. The retention basins required to retain all storm flows in the County would be unrealistic, requiring most of the developed land in the County to be accomplished. The comment may have been suggesting full capture of all flows less than 100 cfs, but, again, this alternative was rejected from further consideration for the same reason: that the retention basins needed to retain and recharge all flows in Los Angeles County waterways less than 100 cfs would require enormous areas of undeveloped lands that are currently developed. Furthermore, groundwater recharge is only feasible in certain areas of the County because of the poor percolation capacity of surficial soils in some areas. The accumulation of subsurface clay lenses creates recharge barriers in many places of the County, making retention and recharge of large quantities of stormwater infeasible in these locations.

TABLE 6-2
ABILITY OF PROJECT ALTERNATIVES TO MEET PROJECT OBJECTIVES

	Proposed Program	No Project	Non-Structural BMPs Only	Distributed Structural/Non-Structural BMPs Only
Project Objectives				
To collaborate among agencies (Permittee jurisdictions) across the watershed to promote more cost-effective and multi-beneficial water quality improvement projects to comply with the MS4 Permit.	Yes	No	No	No
To develop watershed-wide EWMPs that will, once implemented, remove or reduce pollutants from dry- and wet-weather urban runoff in a cost-effective manner.	Yes	No	No	No
To reduce the impact of stormwater and non-stormwater on receiving water quality.	Yes	Yes	No	Yes
Environmental Impacts				
Aesthetics	LSM	Similar	Greater	Fewer
Air Quality (construction/operation)	SU/LTS	Similar	Fewer	Similar
Biology	LSM	Similar	Fewer	Similar
Cultural Resources	SU	Similar	Fewer	Similar
Geology/Mineral Resources	LSM	Similar	Fewer	Similar
Greenhouse Gases	LTS	Similar	Fewer	Similar
Hazards and Hazardous Materials	LSM	Similar	Fewer	Similar
Hydrology and Water Quality	LSM	Greater	Greater	Greater
Land Use/Agriculture	LTS	Similar	Similar	Greater
Noise (construction/operation)	SU/LTS	Similar	Fewer	Similar
Public Services/Recreation	LTS	Similar	Similar	Similar
Population and Housing and Environmental Justice	LTS	Similar	Similar	Similar
Transportation and Traffic	LSM	Similar	Fewer	Similar
Utilities and Service Systems	LSM	Similar	Fewer	Similar

LTS = Less than Significant
LSM = Less than Significant with Mitigation
SU = Significant and Unavoidable

6.7 Environmentally Superior Alternative

CEQA requires that an EIR identify the environmentally superior alternative(s) of a project other than the proposed program or the "no project" alternative (CEQA Guidelines Section 15126.6 (e)(2)). As stated at the beginning of this chapter, the purpose of this alternatives analysis is to consider a reasonable range of alternatives that could feasibly attain most of the basic project objectives and avoid or substantially lessen significant program impacts.

The No Program Alternative would require that individual Permittees design and construct BMPs locally to achieve MS4 Permit compliance. As a result, impacts from construction of large and small BMPs would be similar to the proposed alternative. None of the significant and unavoidable impacts of the proposed alternative would be avoided by this alternative. Furthermore, since the ability to achieve compliance with MS4 Permit water quality objectives would be reduced if each Permittee were on their own, impacts to water quality would be greater under this alternative.

The Distributed Structural BMPs Only Alternative would result in construction of an increased number of distributed BMPs, but would avoid construction and operational impacts associated with the large-scale centralized and regional BMPs. Many of the significant and unavoidable impacts of the proposed alternative would be avoided or substantially minimized under this alternative, including construction impacts involving noise and air emissions. However, since the ability to achieve compliance with MS4 Permit water quality objectives would be reduced without the larger-scale centralized and regional BMPs, impacts to water quality would be greater under this alternative.

The Non-Structural BMPs Only Alternative would avoid all of the significant and unavoidable impacts associated with construction of the structural BMPs. In addition, nearly all of the impacts associated with the proposed alternative would be avoided, including impacts from infiltration to neighboring subsurface structures, mobilization of contaminants, and site-specific impacts to cultural and biological resources. However, since the ability to achieve compliance with MS4 Permit water quality objectives would be substantially reduced, impacts to water quality would be greater under this alternative, and compliance with the MS4 Permit would be unlikely. Even though this alternative would avoid significant and unavoidable impacts of construction and operation of structural BMPs, the failure to meet water quality objectives and achieve MS4 Permit compliance would outweigh the avoidance of the other impacts. In order to reduce overall potential impacts, the EWMPs will emphasize the use of non-structural BMPs that include true source control measures , e.g. reduction of copper in brake pads through enacted state-wide legislation. Furthermore, as discussed, due to the difficultly of locating larger regional BMPs, the use of distributed BMPs with a lower potential for impact will be emphasized in the EWMPs as well. 6-16,

As a result, since the proposed alternative would provide the best chance of achieving regional water quality objectives, it is considered the environmentally superior alternative.