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***Impacts determined not to be significant are addressed in this EIR under **Section VII, Impacts Determined to be Insignificant**, and have been omitted from the Impact Section of this report.

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VI. ALTERNATIVES

INTRODUCTION

This section of the Draft EIR provides a comparative analysis of the merits of alternatives to the proposed Project pursuant to Section 15126(f) of the State CEQA *Guidelines*, as amended. According to the *Guidelines*, the discussion of alternatives should focus on alternatives to a project or its location, which can avoid or substantially lessen the significant effects of the project. The CEQA *Guidelines* indicate that the range of alternatives included in this discussion should be sufficient to allow decision-makers a reasoned choice between alternatives and a proposed project. The "alternatives" discussion should provide decision-makers with an understanding of the environmental merits and disadvantages of various project alternatives.

RANGE OF ALTERNATIVES

The range of alternatives in an EIR is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to make a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any significant effects of the project. Of those alternatives, the EIR only need examine in detail the ones that the lead agency determines could feasibly attain the basic objectives of the project. When addressing feasibility, the CEQA *Guidelines* state 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, jurisdictional boundaries, and whether the applicant can reasonably acquire, control or otherwise have access to the alternative site." The CEQA *Guidelines* also specify that the alternatives discussion should not be remote or speculative, and need not be presented in the same level of detail as the assessment of the proposed project.

Therefore, based on the CEQA *Guidelines*, several factors need to be considered in determining the range of alternatives to be analyzed in an EIR and the level of detail of analysis that should be provided for each alternative. These factors include: (1) the ability of the alternatives to meet the objectives of the project; (2) the nature of the significant impacts of the proposed project; (3) ability of alternatives to avoid or lessen the impacts associated with the project; and (4) the feasibility of the alternatives.

In the case of the proposed project, it must be emphasized that the site is within the Mountaingate Master Plan, which was approved by the City of Los Angeles in 1974 for development with up to 870 dwelling units in five development areas. Local infrastructure constructed to support the initial phases of the master tract was sized to accommodate buildout at 870 du. A total of 300 units have been constructed, leaving a balance of 570 units available within the Master Plan Area to be constructed by the project applicant. The project under consideration in this Draft EIR consists of 29 dwellings, which represents a substantial reduction in development intensity as well as the potential for impacts when compared to the original Mountaingate Master Plan. In essence, the proposed project was considered as a reduced density alternative to the originally planned project. Additionally, the currently proposed 29 single-family project represents the least amount of units that can be built and still achieve the objectives of the project and city. Given that the proposed project represents the original reduced density alternative, very few alternatives to the project exist that meet the requirements of CEQA §15126.6.

PROJECT OBJECTIVES

Project objectives established by the applicant include the following:

- Provide additional single-family housing within the Brentwood-Pacific Palisades District Plan area to address the 18 percent population increase for that area as described in the pending Housing Element of the City of Los Angeles *General Plan*.

- Plan those homes in a clustered pattern along the two ridgelines located at the southern end of the existing Mountaingate development in order to:

  - Complement the existing homes,
  - Complete the existing roadway system, and
  - Minimize the environmental impacts associated with hillside development.

- Provide for continued future open space uses for the site.

- Design high quality homes in order to respond to the demands of individuals and families seeking those housing opportunities in the Brentwood-Pacific-Palisades District Plan area and consistent with the standards of the residences of the existing Mountaingate Community.

- Bring enhancements to the existing residences within Mountaingate through improved:

  - Fire safety and life safety,
  - Drainage, and
  - Geologic stability.

ANALYSIS OF ALTERNATIVES

Section IV, Environmental Impact Analysis, of this EIR identifies one significant unavoidable impact that would result from the project as proposed. The loss of wildlife habitat (animal life) would be an unavoidable significant impact of the proposed project even with implementation of mitigation measures. The analysis in this Draft EIR indicates that the proposed project would impact the environment in the areas of earth, plant life, construction air and noise, traffic and public services. As discussed in the Draft EIR, the implementation of mitigation measures recommended by the Draft EIR would lessen these impacts to less than significant levels.

The alternatives analyzed in this EIR respond to the requirements of CEQA to present analysis of a reasonable range of alternatives that can avoid or lessen these impacts while meeting the basic objectives of the proposed project. This section primarily focuses on alternatives that could avoid or lessen the impacts associated with the proposed 29 single-family units for the Mountaingate project.

A requirement of the CEQA *Guidelines* is analysis of the "No Project" alternative. This discussion is to reflect the existing conditions and what could occur in the future given existing land use regulations and capacities of the existing infrastructure and service systems. In addition to the "No Project" alternative, four other alternatives are analyzed in this EIR. The alternative selected to the Project include:

- Alternative 1 – No Project / No Build Alternative;
- Alternative 2 – Alternative Site;
- Alternative 3 – Stoney Hill Ridge Development Only; and
- Alternative 4 – 29 Larger Lots (Ranch Lots) Alternative.

Alternative 1 – No Project/No Build Alternative

As previously stated, CEQA and the CEQA *Guidelines* require that the lead agency consider the "No Project" alternative, which analyzes the case in which the proposed project is not undertaken. Under this scenario, the 29-unit residential development would not be constructed and the existing environmental setting would remain the same. However, under the current *General Plan* designation and zoning for the site, it is reasonable that another proposal to develop the site may be submitted for review and approval. Per CEQA *Guidelines* Section 15126.6(e)(3)(B), the following discussion

"compares the environmental effects of the property remaining in its existing state against environmental effects which would occur if the project is approved."[1]

Earth Resources: With no development occurring, no grading would take place and fewer people would be concentrated in the area. Therefore, project impacts associated with strong groundshaking would not exist.

Air: As the proposed project would not take place, no operational or construction-related air quality impacts would occur.

Water: Under this alternative, there would be no changes to existing conditions with respect to storm water drainage.

Plant/Animal Life: No impacts would occur with respect to plant life, since no vegetation clearance or development would take place.

Noise: Under this alternative, there would be no temporary construction noise impacts associated with the project.

Land Use: Under this alternative, none of the planned residences would be developed. Consequently, the discretionary actions required of the City of Los Angels, which include a General Plan Amendment, zone change, site plan review, approval of the tentative tract map required for the planned land uses as well as other various actions, would not be required. The project site would remain in its current undeveloped state. As a result, the Brentwood-Pacific Palisades Community Plan area's goal to provide additional single-family housing to address the 18 percent annual population increase as described in the adopted Housing Element of the City of Los Angeles *General Plan* would not be achieved. Additionally, the objective to Provide for permanent open space areas on the site and within the Mountaingate Community would not be achieved.

Traffic: Implementation of this No Development Alternative would not result in the generation of additional trips in the project area. Intersections and roadways would continue to operate under existing conditions.

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1 CEQA *Guidelines*, Section 15126.6, Consideration and Discussion of Alternatives to the Proposed Project, January 1, 2001, p. 126.

Public Services: Under this alternative, there would not be an increase in the need for fire protection and emergency medical services in the project area. There would not be a need for any additional police protection and no generation of additional students to LAUSD area schools would occur.

Utilities: No additional gas or electrical needs would occur, and there would be no water generation or sewage generation on the project site. With no development occurring on-site, there would be no additional solid waste generation.

Safety: Under this alternative, no safety hazards associated with the adjacent landfill would occur as the planned residencies would not be developed.

Aesthetics: With no development occurring on the project site, no aesthetic impacts would occur as the site would be left in its present, undeveloped state.

Cultural Resources: With no development or site disturbance occurring on the project site, there would be no potential for archaeological or paleontological resources to be impacted.

Conclusion: Alternative 1 – No Project Alternative eliminates all the short-term and long-term impacts associated with the construction and operation of the proposed 29 single-family residential units. However, the No Project Alternative would not meet the objectives of the proposed project.

Alternative 2 – Alternative Site Discussion

Implementation of the proposed project would result in unavoidable significant adverse impacts with regards to plant and animal life. The project applicant does not own or have access to other properties that are near employment centers, as compared to the project site. In addition, one of the project objectives is to provide additional single-family housing within the Brentwood-Pacific Palisades District Plan to address the 18 percent increase in population (and hence, increased demand for housing) in this area. The project applicant does not own or have access to other properties within this District Plan area to assist in addressing the population increase. Given the unavailability of land, coupled with the project's objectives identified earlier, no feasible alternative site exists. For this reason, no alternative analysis is provided in this Draft EIR for the proposed project.

Alternative 3 – Stoney Hill Ridge Development Only

This alternative examines the reduction of the size of the proposed project from 29 single-family units to 22 single-family units. Under this alternative, Lots 23 through 29, located along Canyonback Ridge would not be developed. Although the size of the entire property would remain the same, this alternative would reduce the total residential development land area by 11 acres from 25.4 acres to 14.4 acres. As a result of this alternative, the existing "unofficial" trail along Canyonback Ridge would remain in its current location.

Earth: This alternative would not require the same amount of grading as the proposed project, since approximately nine fewer acres of land would be developed. Under this scenario, grading impacts would be reduced in comparison to that of the proposed project.

Air: Air quality impacts under this alternative would be less than those of the proposed project since number of residential units, as well as developable land would decrease. Consequently, operational and construction-related air quality impacts associated with this alternative would be lower than that of the proposed project.

Water: This alternative would reduce the amount of impervious surface compared to that of the proposed project. Surface run-off would, therefore, be less than that of the proposed project. Under either development scenario, site construction activity would include the use of Best Management Practices to minimize sedimentation and erosion.

Plant/Animal Life: Less land area would require disturbance with selection of this alternative, when compared to the project, since fewer units are proposed. As a result, this alternative would reduce the disturbance to habitat. However, under both the proposed project and this alternative, the loss of habitat would represent an unavoidable significant impact.

Noise: Under this alternative, construction noise impacts would be the same as that of the proposed project. This is because the type of construction equipment would be the same, and the nearest sensitive receptors would have the same distances to equipment operation areas as that of the proposed project. However, the duration of the construction noise impacts would be shortened.

Land Use: Under this alternative, land use impacts would be similar to that of the proposed project. Given that development would only occur on the Stoney Hill Ridge, only 0.5 acres would be rezoned

from A1-1 to RE-20 and 17.8 acres rezoned from RE-40 to RE-20, as opposed to 1.1 and 24.3 acres, respectively.

Traffic: Implementation of this alternative would result in a slight reduction in the generation of additional trips to the project area. Intersections and roadways would operate under similar conditions as the proposed project.

Public Services: Under this alternative, there would be a slight decrease in the need for additional fire protection and emergency medical services in the project area as compared to the proposed project. However, the potential for conflagration would be the same as that of the proposed project, since under both scenarios, houses would be placed within a designated Mountain Fire District. The need for additional police protection would be slightly lower than that of the proposed project, since the population under this scenario would decrease by approximately 20, from 82 persons to 62 persons. In addition, LAUSD student generation would be slightly lower under this alternative than under the proposed project.

Utilities: Additional gas or electrical needs would be slightly lower under this alternative than under the proposed project. Water generation, sewage generation and solid waste generation would also be slightly lower as compared to the proposed project, due to the reduced number of residential units. However, no significant impact would occur in these topical areas under either the proposed project or this alternative.

Safety: Impacts under this alternative would remain similar to that of the proposed project as the landfill is located adjacent to the Stoney Hill Ridgeline.

Aesthetics: Impacts under this alternative would be slightly reduced from that of the proposed project. Given that only the Stoney Hill Ridgeline would be developed, aesthetic impacts associated with development along the Canyonback Ridgeline would not occur. Additionally, short-term impacts associated with construction activities would also be avoided under this alternative.

Cultural Resources: Although the development area would include approximately nine fewer acres under this scenario as compared to the proposed project, the likelihood for the disturbance of archaeological and paleontological resources would be the same. This is because both scenarios would involve site clearance, excavation and earthwork in an area with the potential for the existence of cultural resources.

Conclusion: Implementation of the Stoney Hill Ridge Development Only Alternative would meet the objectives of the proposed project. Environmentally, this alternative would result in slightly lower levels of environmental impacts in all CEQA issue areas, as compared with the proposed project. However, in the issue area with unmitigated net impacts, (i.e., Animal Life), this alternative would not be able to avoid the residual impact. Therefore, project implementation under this alternative would also result in an unmitigated significant impact to the environment.

Economically, the loss of seven residential lots would reduce the revenue needed to make the project financially feasible for the project applicant. Existing infrastructure was sized and constructed to accommodate development at a greater intensity than that proposed by the project. To further reduce the number of lots that can be subdivided by the applicant would prohibit a return on investment sufficient to cover fixed expenses associated with development. Given that this alternative would not eliminate the unavoidable significant impact of the proposed project, and would not be financially feasible for the applicant, this alternative has been removed from consideration.

Alternative 4 – 29 Larger Lots (Ranch Lots) Alternative

Under this alternative, the project applicant would develop 29 single-family homes, similar to that of the proposed project. However, the lots would be larger than that of the proposed project, with lots under this alternative beginning at two acres in size.

Earth: Due to the larger lots, more grading would be required under this scenario than the proposed project, and in some cases, grading would extend into the canyons, thereby increasing impacts to earth resources as compared to the proposed project.

Air: Air quality impacts under this alternative would be greater, as compared to the proposed project. Although the number of residential units would be the same, the amount of developable land would increase. This would result in grading of a larger area than the proposed project, and thereby greater construction emissions. Operation related emissions would, however, be the same as that of the proposed project.

Water: Under this alternative, the amount of impervious surface would be greater than that of the proposed project since the developable area would be increased. Surface run-off would, therefore, be greater than that of the proposed project.

Plant/Animal Life: Due to the increased amount of land, and hence developable area, the amount of vegetation that would be cleared would be greater than under the proposed project. As a result, the acreage of habitat that would be lost would be greater. In either case, the loss of habitat would represent an unavoidable significant impact under both the proposed project and this alternative.

Noise: Under this alternative, construction noise impacts would be greater because the area that would be graded is larger than that of the proposed project. Consequently, the duration of construction activity would be longer and construction activity would take place nearer to existing residential uses in the area.

Land Use: Under this alternative, land use impacts could potentially increase as the amount of area required to develop this alternative would increase. Additionally, the amount of area required to rezone RE-20 would also be expected to increase as a result of the larger lot sizes.

Traffic: Implementation of this alternative would result in a slight increase in the generation of additional trips to the project area. Intersections and roadways would operate under similar conditions as the proposed project.

Public Services: Under this alternative, there would be a similar need for additional fire protection and emergency medical services in the project area as compared to the proposed project. The potential for conflagration would also be the same as that of the proposed project, since under both scenarios, houses would be placed within a designated Mountain Fire District. The need for additional police protection would be the same as that of the proposed project, since estimated population would be the same. In addition, LAUSD student generation would be similar under this alternative to the proposed project. However, given that the residential lots under this alternative would be larger than that of the proposed project, land that would be available for dedication as permanent open space would be smaller under this alternative than the proposed project.

Utilities: Additional gas or electrical needs would be similar under this alternative to the proposed project. Water generation, sewage generation and solid waste generation would all be the same as compared to the proposed project, due to the number of residential units.

Safety: Safety impacts would be expected to remain similar or slightly less than the proposed project. Although larger lots would be developed under this alternative, safety impacts would not necessarily increase as site layout and lot configuration could be manipulated to avoid safety concerns in a manner that would be more conducive to human safety.

Aesthetics: Aesthetic impacts would be expected to remain similar or slightly less than the proposed project. Although larger lots would be developed under this alternative, aesthetic impacts would not necessarily increase as site layout and building configuration could be designed in a manner that would lessen visual impacts to surrounding land uses when compared to the proposed project.

Cultural Resources: Although the development area would increase under this scenario as compared to the proposed project, the likelihood for the disturbance of archaeological and paleontological resources would be the same. This is because both scenarios would involve site clearance, excavation and earthwork in an area with the potential for the existence of cultural resources.

Conclusion: Implementation of the 29 Ranch Lot Alternative would meet the objectives of the proposed project. Environmentally, this alternative would result in greater levels of environmental impacts in all CEQA issue areas, as compared with the proposed project. Although this alternative would result in operational impacts that are similar to that of the proposed project (e.g., air quality, noise, traffic, utilities and public services), the unavoidable significant impact associated with the proposed project (i.e., wildlife habitat) would be worsened. In addition, the 424 acres of land dedicated as permanent open space under the proposed project would be reduced under this scenario to approximately 386.5 acres.

IDENTIFICATION OF ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Section 15126.6 (e) (2) of the CEQA *Guidelines* indicates that an analysis of alternatives to the proposed project shall identify one alternative as the environmentally superior alternative. Furthermore, if the environmentally superior alternative is the "No Project" alternative, the EIR shall also identify an environmentally superior alternative from among the other alternatives. From a strictly environmental standpoint, the "No Project" alternative is superior. It leaves the project site in its current undeveloped condition and avoids the significant impacts associated with the proposed project. The "No Project" alternative could be temporary in nature, however, as it would not protect the site from future applications for development.

Of the remaining alternatives, implementation of Alternative 3 – Stoney Hill Ridge Development Only alternative would result in slightly lower levels of environmental impacts as compared with the proposed project. However, in the issue areas with unmitigated net impacts, such as plant life, this alternative would have the same level of impact as the proposed project. From an environmental perspective, this alternative is superior to the proposed project as it slightly reduces the level of impacts associated with the proposed project. However, as previously indicated, this alternative

would not be financially feasible for the project applicant to implement. Moreover, proposed project is intended by the applicant to be the last phase of the Mountaingate development. It is only with the proposed project that the applicant would be able to dedicate 424 acres of land to permanent open space uses. Given that both the proposed project and the Stoney Hill Ridge Development Only Alternative would result in significant unavoidable impacts to plant life, the proposed project represents the least intrusive way for the applicant to develop the property while at the same time meeting the project objectives.