

# Artesia Place Project (Artesia Boulevard Corridor Specific Plan Amendment Case No. 2022-13)

Public Review Partially Recirculated  
Draft Environmental Impact Report  
(SCH No. 2022080202)  
September 2023



Prepared by

**Kimley»Horn**  
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# Partially Recirculated Draft Environmental Impact Report

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## Artesia Place Project (Artesia Boulevard Corridor Specific Plan Amendment Case No. 2022-13)

SCH # 2022080202



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**September 2023**

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## Table of Contents

1.0	Introduction.....	1-1
1.1	Background and Purpose .....	1-1
1.2	Statutory Authority and Requirements.....	1-1
1.3	Project Summary .....	1-2
1.4	Summary of Revisions to the DEIR .....	1-6
1.5	Partially Recirculated DEIR Process .....	1-7
1.6	Final EIR.....	1-8
1.7	Format of the Partially Recirculated DEIR .....	1-8
2.0	Revisions to the DEIR.....	2-1
2.1	Alternatives to the Proposed Project .....	2-1
2.2	Project Summary .....	2-2
2.3	Project Objectives.....	2-2
2.4	Project Impacts.....	2-3
2.5	Project Alternatives .....	2-4
3.0	List of Preparers.....	3-1
3.1	Lead Agency .....	3-1
3.2	Applicant .....	3-1
3.3	Lead Consultant.....	3-1

### **LIST of EXHIBITS**

Exhibit 1-1: Regional Vicinity Map .....	1-3
Exhibit 1-2: Local Vicinity Map.....	1-4
Exhibit 1-3: Conceptual Site Plan.....	1-5

**LIST of TABLES**

Table 2-1: No Project/Existing Land Use Designation Alternative Compared to Project.....	2-12
Table 2-2: No Project/Existing Land Use Alternative Construction Air Pollutant Emissions .....	2-13
Table 2-3: No Project/Existing Land Use Alternative Operational Air Pollutant Emissions .....	2-13
Table 2-4: No Project/Existing Land Use Alternative Operational Greenhouse Gas Emissions.....	2-17
Table 2-5: No Project/Existing Land Use Designation Alternative Estimated Project Water Demand .....	2-21
Table 2-6: No Project/Existing Land Use Alternative Estimated Project Wastewater Generation .....	2-22
Table 2-7: All-Commercial Alternative Compared to The Project.....	2-24
Table 2-8: All-Commercial Alternative Construction Air Pollutant Emissions .....	2-25
Table 2-9: All-Commercial Alternative Operational Air Pollutant Emissions.....	2-26
Table 2-10: All-Commercial Alternative Operational Greenhouse Gas Emissions .....	2-30
Table 2-11: All-Commercial Alternative Estimated Project Water Demand.....	2-34
Table 2-12: All-Commercial Alternative Estimated Project Wastewater Generation .....	2-35
Table 2-13: Reduced Density Alternative Compared to Proposed Project.....	2-37
Table 2-14: Proposed Project and Reduced Density VMT Summary.....	2-45
Table 2-15: Comparison of Alternatives.....	2-50
Table 2-16: Comparison of Alternatives' Ability to Meet Project Objectives.....	2-51

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# Introduction

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## 1.0 Introduction

### 1.1 BACKGROUND AND PURPOSE

The City of Artesia ("City") prepared a Draft Environmental Impact Report ("DEIR")<sup>1</sup> for the Artesia Place Project (Artesia Boulevard Corridor Specific Plan Amendment) ("Project") (SCH No. 2022080202). The DEIR evaluated the environmental impacts associated with the construction and operation of the proposed Project. The DEIR was made available for review and comment to the public, responsible and trustee agencies, interested groups, and organizations for a 45-day review period that occurred between March 27, 2023, and May 10, 2023. The DEIR was also made available directly to State agencies through the State Clearinghouse, Office of Planning and Research. Comments on the DEIR were received from four public agencies, one organization, and two residents.

After public notice was given on March 27, 2023, of the availability of the DEIR for public review under State CEQA Guidelines § 15087 (i.e., before its certification), significant new information was added to the EIR concerning the "Reduced Density" Alternative. Also, minor edits were made to the other alternatives, which are grammatical or clarifying in nature, including concerning energy. Therefore, to ensure the public is not deprived of a meaningful opportunity to comment upon the new information, the City has elected to recirculate a portion of the DEIR, thus, has prepared this Partially Recirculated DEIR ("PR-DEIR"). The PR-DEIR, which replaces **DEIR Section 6.0: Alternatives to the Proposed Project**, is being recirculated for public review and comment per the California Environmental Quality Act (CEQA) and the State CEQA Guidelines, as discussed below.

### 1.2 STATUTORY AUTHORITY AND REQUIREMENTS

The CEQA Statute is codified in Public Resources Code (PRC) §§21000 et seq. The State CEQA Guidelines are found within the California Code of Regulations (CCR), Title 14, Division 6, Chapter 3, §§15000-15387.

State CEQA Guidelines §15088.5 requires a lead agency to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the DEIR for public review under State CEQA Guidelines §15087 but before certification. "Information" can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not "significant" unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of a project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement. "Significant new information" requiring recirculation includes, for example, a disclosure showing that:

- 1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.

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<sup>1</sup> The DEIR is available for review on the City's website, at: <https://www.cityofartesia.us/457/Artesia-Boulevard-Corridor-Specific-Plan>

- 2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
- 3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it.
- 4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public comments were precluded.

Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR. Further, if the revision is limited to a few chapters or portions of the EIR, the lead agency can recirculate the chapters or portions that have been modified.

Per State CEQA Guidelines §15088.5, recirculation of an EIR requires notice under State CEQA Guidelines §15087, and consultation with responsible agencies, trustee agencies, agencies with jurisdiction by law over the project, and other entities pursuant to State CEQA Guidelines §15086.

## 1.3 PROJECT SUMMARY

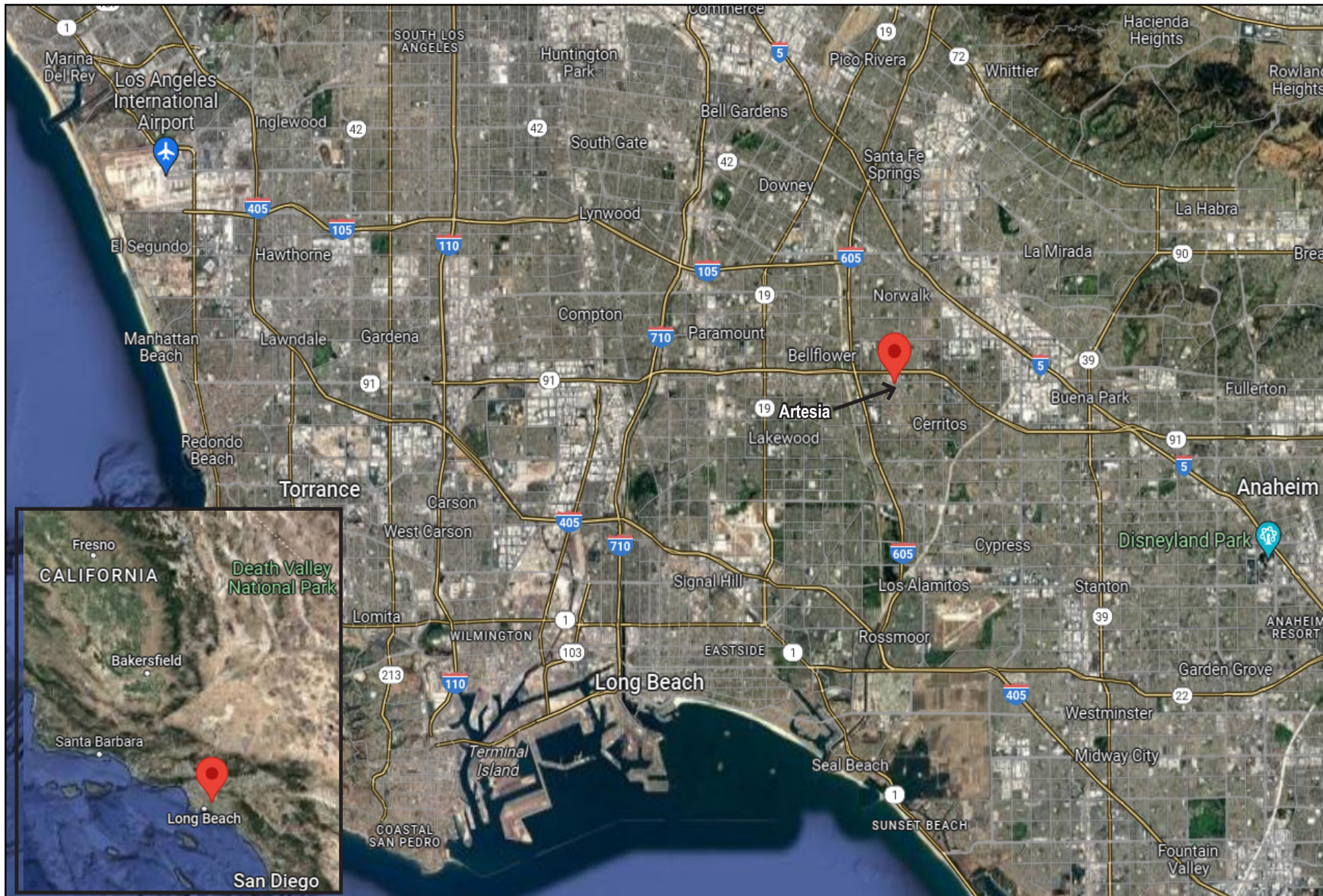
The Project site is in the City of Artesia, which encompasses approximately 1.6 square miles in the southeast portion of the County of Los Angeles (County); see **Exhibit 1-1: Regional Vicinity Map**. The Project site consists of one approximately 3.3-acre parcel (Assessor Parcel Number [APN] 7035-016-064) located at 11709 Artesia Boulevard; see **Exhibit 1-2: Site Vicinity Map**. The Project site is located at the northeast portion of a 21-acre area (i.e., the Artesia Boulevard Corridor Specific Plan area), which extends along Artesia Boulevard, generally between Corby Avenue on the east and Gridley Road on the west. The Project site is currently vacant.

The Project proposes the construction and operation of a mixed-use development comprised of 80 dwelling units and approximately 11,257 gross square feet (GSF) of non-residential (commercial and office) land uses; see **Exhibit 1-3: Conceptual Site Plan**. The Project would construct a mixed-use development generally comprised of two portions – a commercial portion and a residential portion – connected by pedestrian walkways. The following proposed land uses would be developed at a density of 23.2 dwelling units per acre (DU/AC) and floor area ratio (FAR) of 1.21:

- Townhomes: 10 buildings with 59 three-story townhome units.
- Mixed-Use Carriage Townhomes: One mixed-use building with approximately 3,450 GSF of commercial uses on the ground level and 4 carriage-type townhome units above;
- Shopkeeper Units: Two buildings with 8 commercial condominiums totaling approximately 2,664 GSF on the ground level and 8 townhome units above;
- Commercial: One building with approximately 2,700 GSF of commercial uses; and
- Live/Work Townhomes: Two buildings with approximately 2,443 GSF of office use and 9 townhome units.

See **DEIR Section 2.0: Project Description** for a full description of the proposed Project.



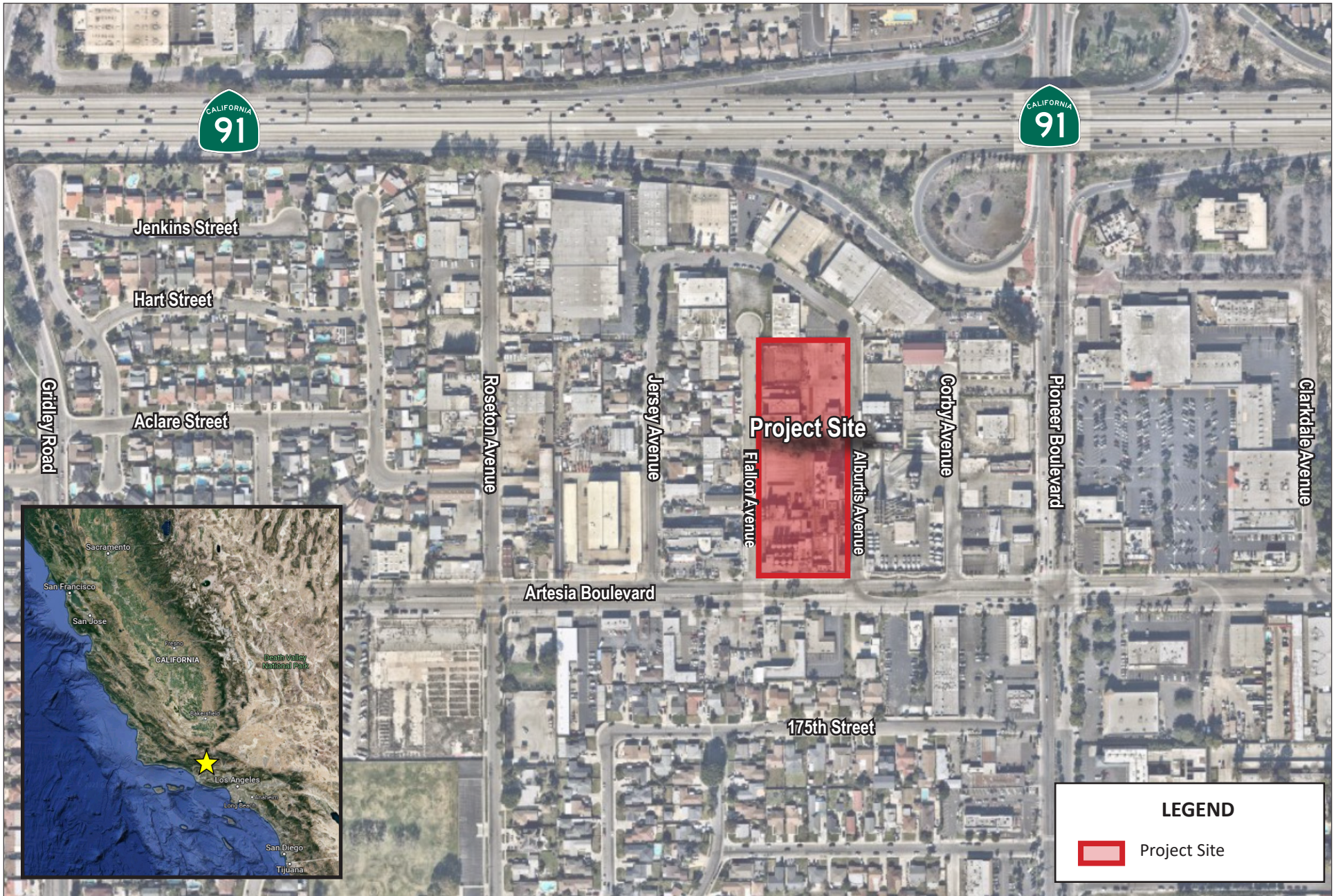


## EXHIBIT 2-1: REGIONAL VICINITY MAP

Artesia Place Project (Artesia Boulevard Corridor Specific Plan Amendment)

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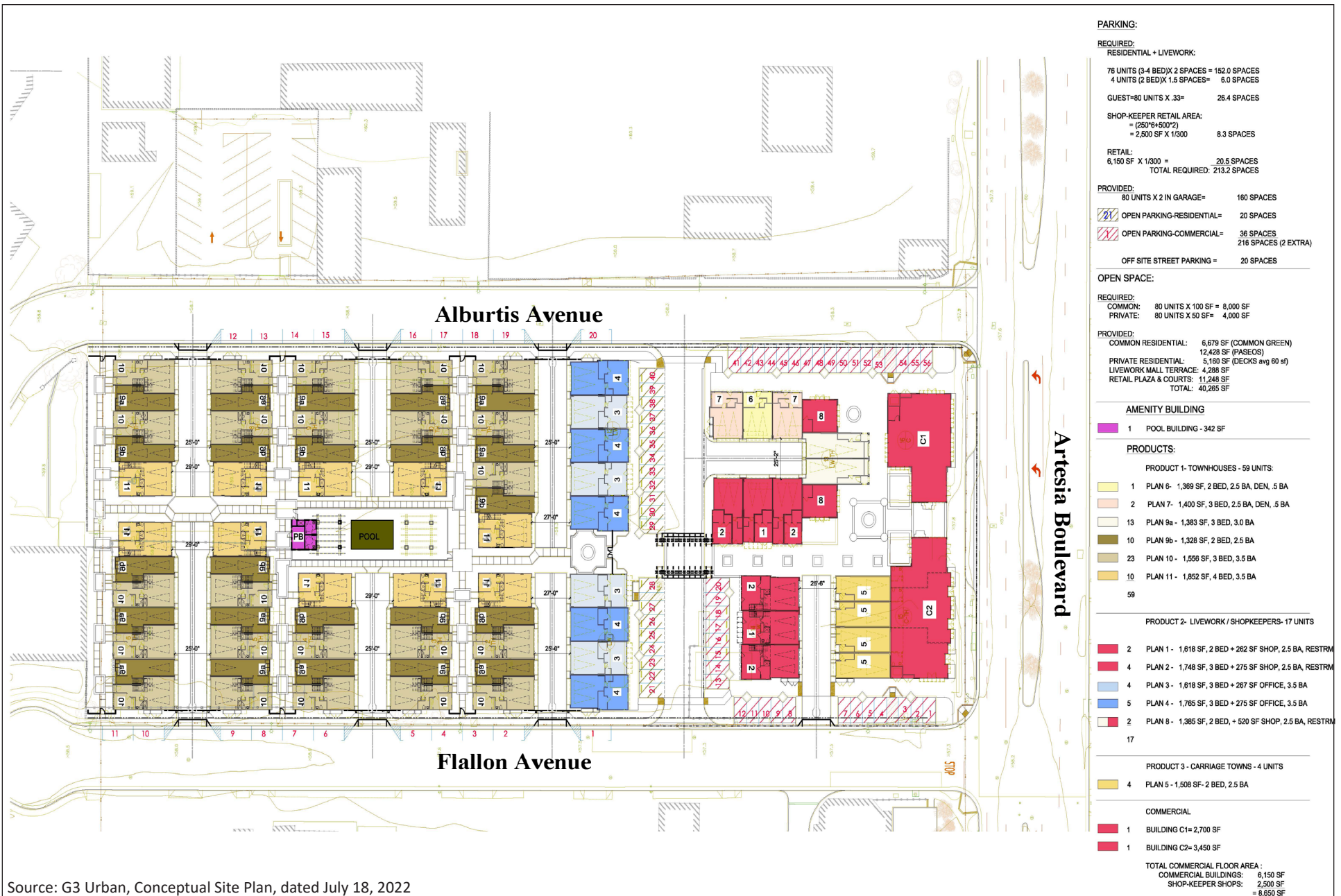


## EXHIBIT 1-2: LOCAL VICINITY MAP

Artesia Place Project (Artesia Boulevard Corridor Specific Plan Amendment)

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Source: G3 Urban, Conceptual Site Plan, dated July 18, 2022

## EXHIBIT 1-3: CONCEPTUAL SITE PLAN

Artesia Place Project (Artesia Boulevard Corridor Specific Plan Amendment)

The Project is designed to be a mixed-use, pedestrian-oriented placemaking development with various commercial opportunities. The buildings are linked by a central pedestrian walkway through a series of landscaped courtyards. The Project site is divided into two portions: the northern portion is bisected by the central pedestrian walkway, pool, and pool building and consists of traditional paseo rowtown-inspired residential clustering around a recreation area; and the southern portion fronting Artesia Boulevard consists of the urban commercial mixed-use buildings.

Project construction is anticipated to occur over approximately 24 months, beginning September 2023 and ending August 2025.

## 1.4 SUMMARY OF REVISIONS TO THE DEIR

State CEQA Guidelines § 15088.5(g) states, “[w]hen recirculating a revised EIR, either in whole or in part, the lead agency shall, in the revised EIR or by an attachment to the revised EIR, summarize the revisions made to the previously circulated draft EIR.”

### 1.4.1 Revised DEIR Section 6.0: Alternatives to the Proposed Project

As previously noted, the City has decided to recirculate **DEIR Section 6.0**.

**DEIR Section 6.0** specifies that in addition to the No Project/No Construction, No Project/Existing Land Use Designation, and All-Commercial Alternatives, a Reduced Density Alternative was considered, which was similar to the Project, but proposed a reduced density. The DEIR did not provide further explanation or analysis regarding the Reduced Density Alternative. This PR-DEIR has added **Section 6.4.5: Reduced Density Alternative** to evaluate the comparative merits of the Alternative. **PR-DEIR Section 6.4.5** analyzes the Reduced Density Alternative's impacts for each environmental issue area, as examined in **DEIR Section 4.1** through **Section 4.12**. The Reduced Density Alternative was compared to the proposed Project on an issue-by-issue basis, as summarized in **PR-DEIR Table 6-3: Comparison of Alternatives**. As indicated in **PR-DEIR Table 6-3**, the environmentally superior Alternative is the No Project/No Construction Alternative because the No Project/No Construction Alternative would be environmentally superior to the proposed Project for all resource areas analyzed apart from population and housing. Among the other Alternatives, the Reduced Density Alternative is the environmentally superior Alternative. As shown in **PR-DEIR Table 6-3**, the Reduced Density Alternative would be environmentally superior to the proposed Project in the following resource areas: air quality, GHG emissions, population and housing, and public services and recreation. The Reduced Density Alternative would be neither inferior nor superior for resource areas including cultural resources, energy, geology and soils (paleontological resources), noise, tribal cultural resources, and utilities and service systems. The Reduced Density Alternative would be environmentally inferior concerning transportation. As discussed in **PR-DEIR Section 6.5.4** and shown in **PR-DEIR Table 6-4: Alternatives Ability to Meet Project Objectives**, the Reduced Density Alternative would meet some of the Project's objectives, but would either partially meet or not meet all the Project's other objectives.

**PR-DEIR Section 6.0** also includes minor edits to the other alternatives, which are grammatical or clarifying in nature. Upon re-evaluation concerning energy impacts, it was determined that the No Project/Existing Land Use Designation and All-Commercial Alternatives would be neither environmentally superior nor inferior to the proposed Project. Although these alternatives both



resulted in greater energy demands, they would not result in greater impacts concerning wasteful, inefficient, or unnecessary consumption of energy resources. In contrast, the DEIR concluded the No Project/Existing Land Use Designation and All-Commercial Alternatives would be environmentally superior and inferior to the proposed Project, respectively.

## 1.5 PARTIALLY RECIRCULATED DEIR PROCESS

State CEQA Guidelines §15088.5(f) requires the lead agency to evaluate and respond to comments on the PR-DEIR pursuant to State CEQA Guidelines §15088. However, when the DEIR is revised only in part and the lead agency is recirculating only the revised chapter(s) or portions of the DEIR, the lead agency may request that reviewers limit their comments to the revised chapters or portions of the PR-DEIR. The lead agency need only respond to comments received during the initial circulation period that related to chapters or portions of the DEIR that were not revised or recirculated and comments received during the recirculation period that relate to the chapters or portions of the DEIR that were revised and recirculated. As such, and per State CEQA Guidelines §15088.5(f)(2), the City is requesting that commenters limit their comments to the PR-DEIR, which is **Section 6.0**. This recirculated text is provided in **PR-DEIR Section 2.0: Revisions to the DEIR**. Reviewers should not resubmit comments on the previously circulated DEIR. In the Final EIR, the City will only respond to (i) comments received during the initial circulation period that relate to chapters, sections, appendices, or portions of the DEIR that were not revised and recirculated, and (ii) comments received during the recirculation period that relate to the revised and recirculated DEIR section.

The Notice of Availability of the PR-DEIR was provided by the City to agencies, organizations, and interested groups and persons for comment during a 45-day public review period per State CEQA Guidelines §§15087 and 15105. The Notice of Completion for the PR-DEIR was distributed by the City as required by State CEQA Guidelines. The PR-DEIR is available for review at the City of Artesia website:

- <https://www.cityofartesia.us/336/Community-Development>

The PR-DEIR is also available for review at the following locations:

- Artesia City Hall, Planning Department, 18747 Clarkdale Avenue, Artesia, CA 90701
- Artesia Public Library, 18801 Elaine Avenue, CA 90701
- Artesia Public Park, 18750 Clarkdale Avenue, Artesia, CA 90701

Responsible agencies, interested parties, and the public are invited to comment in writing on the information contained in the PR-DEIR. All comments should be submitted in writing to:

City of Artesia, Planning Department  
Okina Dor, Community Development Director  
18747 Clarkdale Avenue  
Artesia, CA 90701  
Email: [Planning@cityofartesia.us](mailto:Planning@cityofartesia.us)  
Phone: (562) 865-6262

Should you have trouble accessing these documents, please contact the City at [Planning@cityofartesia.us](mailto:Planning@cityofartesia.us).

## 1.6 FINAL EIR

Upon completion of the 45-day PR-DEIR public review period, the City will evaluate all written comments and prepare written responses to comments received during the DEIR and PR-DEIR public review period concerning significant environmental issues pursuant to State CEQA Guidelines §15088.5.

As outlined in State CEQA Guidelines §15132, the Final EIR will be prepared and will include:

- The DEIR or a revision of the draft;
- Comments and recommendations received on the DEIR and PR-DEIR either verbatim or in summary;
- A list of persons, organizations, and public agencies commenting on the DEIR and PR-DEIR;
- The Lead Agency's responses to significant environmental points raised in the review and consultation process; and
- Any other information added by the Lead Agency.

The FEIR will allow the public and Lead Agency an opportunity to review DEIR and Recirculated DEIR revisions, the comments and responses, and other EIR components, such as the Mitigation Monitoring and Reporting Program (MMRP) before Project approval. The FEIR will serve as the environmental document to support a decision on the proposed Project. Additionally, pursuant to State CEQA Guidelines §15088, after the FEIR is completed, the City will provide a written proposed response to each public agency on comments made by that public agency at least ten days before certifying the EIR.

## 1.7 FORMAT OF THE PARTIALLY RECIRCULATED DEIR

This PR-DEIR is organized into the following sections:

**Section 1.0: Introduction**, provides a Project summary, PR-DEIR summary, and CEQA compliance information.

**Section 2.0: Revisions to the DEIR**, contains revised Section 6.0: Alternatives to the Proposed Project, which describes potential Project alternatives, including the Reduced Density Alternative.

**Section 3.0: List of Preparers** identifies the Lead Agency and PR-DEIR preparation team.

2.0

# Revisions to the DEIR



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## 2.0 Revisions to the DEIR

### 2.1 ALTERNATIVES TO THE PROPOSED PROJECT

Under the California Environmental Quality Act (CEQA), the identification and analysis of alternatives to a project is a fundamental part of the environmental review process. Public Resources Code (PRC) §21002.1 (a) establishes the need to address alternatives in an 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 further provided in State CEQA Guidelines §15126.6(a), 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 of the alternatives.*

The State CEQA Guidelines emphasize that the selection of project alternatives be based primarily on the ability to reduce impacts relative to a Project, "even if these alternatives would impede to some degree the attainment of the project objectives or would be more costly."<sup>1</sup> The State 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.<sup>2</sup>

In selecting project alternatives for analysis, potential alternatives must pass a test of feasibility. State CEQA Guidelines §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 (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site...*

Beyond these factors, the State 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, the EIR shall also identify an environmentally superior alternative among the other alternatives."<sup>3</sup> In addition, State CEQA Guidelines §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.

<sup>1</sup> State CEQA Guidelines §15126.6(b).

<sup>2</sup> State CEQA Guidelines §15126.6(f).

<sup>3</sup> State CEQA Guidelines §15126.6(e)(2).

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 Project shall also include those that could feasibly accomplish most of the basic project objectives and could avoid or substantially lessen one or more of the significant effects. An alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative need not be considered.

## 2.2 PROJECT SUMMARY

The Artesia Place (Artesia Boulevard Corridor Specific Plan Amendment) Project ("Project") would be developed in the City of Artesia ("City"). The Project site consists of one approximately 3.3-acre parcel (Assessor Parcel Number (APN) 7035-016-064) located at 11709 Artesia Boulevard. The Project site is located in the northeast portion of the 21-acre Artesia Boulevard Corridor Specific Plan (ABCSP) area, which extends along Artesia Boulevard, generally between Corby Avenue on the east and Gridley Road on the west. The Project proposes the construction and operation of a mixed-use development comprised of 80 dwelling units (DU) and approximately 11,257 gross square feet (GSF) of non-residential (commercial and office) land uses.

To allow the proposed development, the Applicant proposes to amend the ABCSP. The proposed ABCSP Zoning Code Text Amendment is intended to permit residential uses on the Project site, establish a maximum allowable development within the Project site, and amend the ABCSP's Design Standards and Guidelines (among other chapters). In addition to the Zoning Code Text Amendment, the Project seeks approval of the following entitlements: General Plan Amendment; Design Review; Development Agreement; and Vesting Tentative Tract Map No. 83834. A full project description is provided in **Draft Environmental Impact Report (DEIR) Section 2.0: Project Description**.

## 2.3 PROJECT OBJECTIVES

Pursuant to State CEQA Guidelines §15124(b), the EIR project description must include "[a] statement of objectives sought by the proposed project...The statement of objectives should include the underlying purpose of the Project."

The underlying purpose of the Project is to further implementation of the ABCSP and help address the City's Regional Housing Needs Assessment (RHNA) housing obligations by developing vacant and underutilized ABCSP land with new infill mixed-use and residential uses.

The Project objectives are:

- Redevelop a large underutilized industrial site within the Artesia Boulevard Corridor Specific Plan into a new high-quality walkable mixed-use community with various compatible uses including residential, neighborhood-serving ground floor commercial (restaurant and retail), live/work units with office uses, and onsite amenities.
- Create a mixed-use development that encourages walkability and convenience by providing onsite residential uses, neighborhood-serving restaurant and retail uses, and office/commercial uses.

- Address the City's RHNA housing goals by building new residential dwelling units on the site in a manner that minimizes the potential for displacement of existing uses.
- Physically and functionally integrate the proposed development with the surrounding Artesia Boulevard Corridor Specific Plan community by extending the neighborhood urban pattern and surrounding street grid into the site through a series of pedestrian open spaces, including a north-to-south, full site depth, pedestrian access way.
- Create complementary designs and uses that are compatible with the surrounding neighborhoods by continuing active ground floor retail/restaurant uses along Artesia Boulevard site frontage, adding to the area's mix of uses and businesses.
- Provide a high-quality, varied, and modern architectural and landscape design that is compatible with its diverse surrounding context, and utilizes the site's unique characteristics.
- Provide viable public and private open space for project residents and surrounding community members by creating a green, welcoming, walkable environment that will encourage use of the outdoors and community interaction.
- Include sufficient off-street parking for the proposed residential, commercial, and office uses.
- Provide an infill development that promotes sustainability by providing electric (non-gas) appliances and connections for the residential component.

## 2.4 PROJECT IMPACTS

### 2.4.1 Project Significant and Unavoidable Impacts

As discussed throughout **DEIR Section 4.0: Environmental Impact Analysis**, there would be no significant and unavoidable Project impacts.

### 2.4.2 Impacts That Can Be Mitigated to Below a Level of Significance

State CEQA Guidelines §15126.6(b) states that "Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (PRC §21002.1), 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 would be more costly."

Project impacts associated with the following resource areas would be potentially significant, but would be reduced to a less than significant with mitigation incorporated:

- Air Quality – expose sensitive receptors to substantial pollutant concentrations.
- Cultural Resources – cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines §15065.5.
- Geology and Soils (Paleontological) – destroy a unique paleontological resource or site or unique geologic feature.



- Noise – generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.
- Public Services and Recreation – require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.
- Tribal Cultural Resources – cause a substantial adverse change in the significance of a tribal cultural resource.

## 2.5 PROJECT ALTERNATIVES

The analysis presented below compares the potential environmental impacts associated with the following alternatives to impacts from the Project:

- “No Project/No Construction” Alternative;
- “No Project/Existing Land Use Designation” Alternative;
- “All-Commercial” Alternative; and
- “Reduced Density” Alternative.

Throughout the following analysis, the alternatives' impacts are analyzed for each environmental issue area, as examined in **DEIR Section 4.1** through **DEIR Section 4.12**. In this manner, each Alternative can be compared to the Project on an issue-by-issue basis. **Table 2-3: Comparison of Alternatives**, which is included at the end of this Section, compares each Alternative's impacts to the Project's impacts. This Section also identifies alternatives that were considered by the lead agency but were rejected as infeasible. **Section 6.6: “Environmentally Superior” Alternative**, references the “environmentally superior” Alternative, as required by State CEQA Guidelines §15126.6(e)(2).

### 2.5.1 “No Project” Alternative

#### DESCRIPTION OF ALTERNATIVE

Under State CEQA Guidelines §15126.6(e), the specific Alternative of “no project” shall also be evaluated along with its impact. The purpose of describing and analyzing a no project alternative is to allow decision-makers to compare the impacts of approving the Project with the impacts of not approving the Project. The “no project” analysis is required to discuss the existing conditions (at the time the Notice of Preparation is published), as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.

The discussion of the no project alternative usually proceeds along one of two lines. If the project is not a land use or regulatory plan, for example, a development project on an identifiable property, the “no project” alternative is the circumstance under which the project does not proceed. Here, the discussion would compare the environmental effects of the property remaining in its existing state against environmental effects which would occur if the project were approved. If disapproval of the project under consideration would result in predictable actions by others, such as the proposal of some other project, this “no project” consequence should be



discussed. In certain instances, the no project alternative means “no build” wherein the existing environmental setting is maintained. However, where failure to proceed with the project would not result in the preservation of existing environmental conditions, the analysis should identify the practical result of the project’s non-approval and not create and analyze a set of artificial assumptions that would be required to preserve the existing physical environment.

Therefore, two “No Project” Alternatives are analyzed below: the circumstance under which the Project does not proceed and the Project site remains in its existing state; and the circumstance under which the Project does not proceed, but the Project site is developed, based on current plans (i.e., Artesia Boulevard Corridor Specific Plan [ABCSP], Artesia General Plan, and Artesia Municipal Code Zoning Ordinance [AMC] and consistent with available infrastructure and community services (what would reasonably be expected to occur in the foreseeable future, if the Project were not approved).

## 2.5.2 “No Project/No Construction” Alternative

### DESCRIPTION OF ALTERNATIVE

The Project site consists of one approximately 3.3-acre parcel (Assessor Parcel Number (APN) 7035-016-064) located at 11709 Artesia Boulevard; see **Exhibit 1-2: Local Vicinity Map**. The Project site is currently vacant and all existing onsite utility connections are capped and abandoned in place. The Project site is in an infill site surrounded by urban uses. The land uses that surround the Project site are summarized in **DEIR Table 2-1: On-site and Surrounding Land Uses and Zoning**.

The General Plan designates the Project site as Gateway Community Commercial, which provides for a complimentary mix of job-creating industrial and manufacturing uses, and local/regional-serving commercial retail and office uses. The City’s Zoning Map classifies the Project site as Artesia Boulevard Corridor Specific Plan (ABCSP). The ABCSP establishes the City’s vision for a 21-acre area along Artesia Boulevard, between Gridley Road and Pioneer Boulevard. For Quadrant 2, where the Project site is located, the City’s primary goal is to establish a retail, commercial, and industrial center. The No Project/No Construction Alternative would retain the Project site in its current vacant condition. None of the Project’s improvements would be constructed. Further, the Project’s requested entitlement (i.e., ABCSP Zoning Code Text Amendment, General Plan Amendment, Design Review, Development Agreement, and Vesting Tentative Tract Map No. 83834) would not be granted.

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

### IMPACT COMPARISON TO THE PROPOSED PROJECT

#### Air Quality

The Project’s short-term air quality impacts from grading and construction activities would be less than significant with mitigation incorporated. Under the No Project/No Construction Alternative because there would be no development, no construction-related air pollutant emissions would be generated. This Alternative would also not expose sensitive receptors to substantial pollutant concentrations, which is concluded to be less than significant for the Project through compliance with the established regulatory framework and with mitigation incorporated.

The Project's operational pollutant emissions would be less than significant, as no threshold would be exceeded. As the Project site is vacant, there are no existing operational emissions associated with the Project site. Under the No Project/No Construction Alternative because there would be no development, no operational pollutant emissions would be generated.

### **Cultural Resources**

The Project would result in no impact on historical resources and a less than significant impact with mitigation incorporated concerning archaeological resources. Under the No Project/No Construction Alternative, no impact on historical resources would occur, as none are present on the Project site. Under this Alternative, the Project site would remain in its current condition and no construction or grading activities would occur. Therefore, the potential to discover and impact previously undisturbed archaeological resources, would not occur. This Alternative would have no impact on archaeological resources, whereas the Project's impacts would be less than significant with mitigation incorporated.

### **Energy**

The Project would result in construction-related energy consumption from water usage for dust control, diesel fuel consumption from on-road hauling trips and off-road construction diesel equipment, and gasoline consumption from on-road worker commute and vendor trips. However, the Project would result in less than significant impacts concerning construction-related energy usage since wasteful, inefficient, or unnecessary consumption of energy resources would not occur following compliance with Title 24 requirements. Under the No Project/No Construction Alternative, the site would remain vacant and no construction activity would occur. Under this Alternative, construction-related energy consumption would not occur because no development would occur. Therefore, the No Project/No Construction Alternative would have no impact concerning energy demand, whereas the Project would result in a less than significant impact.

The Project's operational energy consumption would occur from building energy use (electricity and natural gas), water use, and transportation-related fuel use. The Project would be subject to compliance with applicable energy standards. Therefore, Project operations would not result in wasteful, inefficient, or unnecessary consumption of energy resources, resulting in a less than significant impact concerning energy. Further, the Project would not conflict with/obstruct a State or local plan for renewable energy or energy efficiency. Under the No Project/No Construction Alternative, the site would remain vacant and no operational energy consumption would occur. This Alternative would result in no operational energy demand and thus no potential for wasteful, inefficient, or unnecessary consumption of energy resources, whereas the Project would result in a less than significant impact.

### **Geology and Soils (Paleontological)**

The Project would result in a less than significant impact with mitigation incorporated concerning the potential to destroy a unique paleontological resource. Under the No Project/No Construction Alternative, no construction activities would occur on the Project site, thus, the potential for unique paleontological resources to be impacted by ground-disturbing activities would not occur. This Alternative would have no impact on paleontological resources, whereas the Project's impacts would be less than significant with mitigation incorporated.

## Greenhouse Gas Emissions

The Project would result in less than significant impacts from short-term greenhouse gas (GHG) emissions associated with construction activities, direct operational GHG emissions from operational vehicular traffic, onsite combustion of natural gas, and landscaping equipment, and indirect operational GHG emissions from offsite generation of electrical power, and the energy required to convey water to, and wastewater from the Project site. Under the No Project/No Construction Alternative, there would be no construction activities or new development, thus there would be no short-term GHG emissions nor long-term direct and indirect operational GHG emissions. This Alternative would not generate additional GHG emissions, whereas the Project's GHG emissions would be less than significant.

## Land Use and Planning

The Project would require an ABCSP Zoning Code Text Amendment to permit residential uses on the Project site, establish a maximum allowable development within the Project site, and amend the ABCSP's Design Standards and Guidelines (among other chapters). Additionally, the Project requires approval of the following entitlements: General Plan Amendment; Design Review; Development Agreement; and Vesting Tentative Tract Map No. 83834. Following approval of the Project's requested entitlements, no conflict with the General Plan or AMC would occur, and the Project would result in a less than significant impact. Under the No Project/No Construction Alternative, the Project site would remain vacant. Under this Alternative, none of the required entitlements would be implemented and no impact would occur. This Alternative would eliminate the need for the requested entitlements, whereas the Project's impacts would be less than significant.

## Noise

The Project's construction noise levels would not exceed the applicable Federal Transit Administration (FTA) noise standards at the noise-sensitive receptors nearest the Project site and construction would occur pursuant to the City's Noise Ordinance, resulting in less than significant impacts. The Project's construction-related vibration impacts would also be less than significant because vibration velocities would be below the FTA peak particle velocity (PPV) thresholds for building damage and human annoyance. Under the No Project/No Construction Alternative, there would be no construction activities or associated construction equipment operations. Therefore, there would be no construction noise or vibration impacts.

The Project would result in less than significant operational mobile source noise impacts from offsite traffic noise because the estimated noise increases along study area roadways are considered negligible. Under the No Project/No Construction Alternative, no development would occur. Therefore noise-sensitive receptors located near the Project area would not be exposed to a new traffic noise impact.

As shown in **DEIR Table 4.7-11: Stationary Source Noise Levels**, the Project's stationary source noise levels, which account for onsite noise sources (i.e., mechanical equipment, parking area, truck deliveries, trash/recycling collection, and land maintenance) would be below the City's significance thresholds at noise sensitive receptors, resulting in less than significant impacts. Under

the No Project/No Construction Alternative, no development would occur and no stationary noise sources would be generated.

The Project would not result in substantial temporary increase in noise levels or exposure of persons to or generation of noise levels in excess of standards. Under this Alternative, no construction or operational noise or vibration impacts would occur, whereas the Project would result in less than significant construction noise impacts and the operational noise impacts would be less than significant with mitigation incorporated.

### Population and Housing

The Project proposes 80 DU and approximately 11,257 GSF of non-residential (commercial and office) land uses, which would generate approximately 30 jobs. The Project would increase the City's housing stock and population (270 growth in population) by approximately 1.7 percent over existing conditions; see **DEIR Table 4.8-7: City Housing, Population, and Employment Forecasts (Existing With Project Conditions)**. Although the Project would induce population growth in the City directly through the construction of new homes, the population growth would not be substantial. Under the No Project/No Construction Alternative, the Project site would remain vacant, thus, new housing would not be developed and new jobs would not be generated. This Alternative would not result in a direct increase in the City's population. Neither the Project nor the No Project/No Construction Alternative would result in significant impacts concerning substantial unplanned population growth. However, this Alternative would not be in furtherance of the City meeting their 2021-2029 RHNA allocation.

### Public Services and Recreation

The Project would generate an incremental increase in demands for fire and police protection, and library services. However, because the Project site is in a developed area where these services and equipment/infrastructure are already in place, the Project would not require construction of new or physically altered fire and police protection, or library facilities, resulting in a less than significant impact in this regard. Also, the Project is forecast to generate a student population growth of approximately 43 students at the ABC Unified School District (ABCUSD), which would incrementally increase the demand for school facilities and services. However, there is student capacity at schools throughout the ABCUSD, and with payment of school impact fees in accordance with Senate Bill (SB) 50, Project impacts would be fully mitigated and no physical impacts concerning school facilities would occur. Under the No Project/No Construction Alternative, there would be no demand for police or fire protection services, schools, or library services, as the Project site would remain vacant. Notwithstanding, neither this Alternative nor the Project would result in the need for construction of fire protection, police protection, schools, or library facilities, thus, would not cause environmental impacts from their construction.

The Project's forecast population growth could incrementally increase the use of existing neighborhood and regional parks/other recreational facilities. However, the incremental increase would not be such that substantial physical deterioration of existing facilities would occur or be accelerated given the Project would provide onsite open space and recreational facilities, and would be subject to payment of Development Impact Fees (DIFs). Because the No Project/No Construction Alternative assumes the site would remain vacant, this Alternative would have no

impact on parks/recreational facilities. The Project would have a less than significant impact on parks/recreational facilities, whereas, this Alternative would have no impact.

The Project would not result in adverse physical impacts associated with park facilities, since it does not propose to provide or physically alter a park facility. The Project does propose onsite open space and recreational amenities (i.e., pool and pool building), which would result in a less than significant physical effect on the environment with mitigation incorporated. This Alternative does not propose any development or alterations of park facilities thus, no environmental effects from construction of such facilities would occur. This Alternative would avoid environmental effects from construction of recreational facilities, whereas the Project's effects would be less than significant with mitigation incorporated.

### **Transportation**

The Project would have a less than significant impact concerning conflict with a program, plan, ordinance, or policy addressing the circulation system. The No Project/No Construction Alternative would result in no impact on the circulation system since this Alternative would not generate population growth, or result in demand on transit, roadway, bicycle, and pedestrian facilities.

The Project's Vehicle Miles Traveled (VMT) analysis was based on the Los Angeles County Transportation Impact Analysis Guidelines (TIA Guidelines). Project operations met two of the four screening criteria for VMT under the TIA VMT screening guidelines. The Project would be local-serving in nature and the non-residential uses (i.e., retail, restaurant, and office) screened out of further VMT analysis based on Retail Project Site Plan and Non-Retail Project Trip Generation screening, respectively. Therefore, based on the methodology used by the City, the Project would have a less than significant transportation impact concerning VMT. Under the No Project/No Construction Alternative, the Project site would remain vacant and would not generate any VMT, therefore, no impact would occur.

All onsite and site-adjacent improvements and Project driveways would be constructed as approved by the City of Artesia Public Works Department. Therefore, the Project would not increase transportation hazards due to a geometric design feature. The No Project/No Construction Alternative would not result in any changes concerning geometric design features because no development or site improvements would be implemented, thus, no impact would occur.

The Project's construction activities would not impede the use of roads for emergencies or emergency response vehicles. Therefore, the Project would result in less than significant impacts concerning emergency access during construction. The No Project/No Construction Alternative would not result in any construction or operational activities; thus, emergency access would remain unchanged and no impact would occur. This Alternative would have no impacts concerning transportation, whereas the Project's impact would be less than significant.

### **Tribal Cultural Resources**

The Project would result in a less than significant impact with mitigation incorporated concerning tribal cultural resources. Under The No Project/No Construction Alternative, no ground-disturbing activities would occur, therefore, no impact to tribal cultural resources would occur. The No

Project/No Construction Alternative would have no impact on tribal cultural resources, whereas the Project's potential impacts would be less than significant with mitigation incorporated.

### Utilities and Service Systems

The Project would require relocation/construction of new water, wastewater, stormwater, electricity, natural gas, and telecommunication facilities but these improvements would be limited to connections to existing facilities near the Project site, resulting in less than significant impacts with mitigation incorporated. The No Project/No Construction Alternative would not require relocation/construction of new water, wastewater, stormwater, electricity, natural gas, and telecommunication facilities and, therefore, would not cause environmental effects from construction of such facilities. This Alternative would result in no environmental effects from construction of utilities, whereas the Project would result in less than significant impacts with mitigation incorporated.

As shown in **DEIR Table 4.12-7: Estimated Water Demand**, the Project's water demand is estimated to total approximately 31.23 AFY, which represents approximately 0.6 percent of the total UWMP projected 2025 water demand. GSWC has confirmed there would be sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years, resulting in a less than significant impact.<sup>4</sup> The Project would comply with state and local standards, and would generate an incremental increase in solid waste, but it would not exceed the capacity of local landfills. The No Project/No Construction Alternative would not include development, thus, would not generate water demand or solid waste. This Alternative would result in no impact concerning water demand and solid waste, whereas the Project would result in less than significant impacts.

As shown in **DEIR Table 4.12-4**, the Project would generate approximately 20,937 gpd (0.02 mgd) of wastewater, which would be treated at LACSD's Joint Water Pollution Control Plant (JWPCP) or the Long Beach Water Reclamation Plant (LBWRP). The JWPCP has a capacity of 400 mgd and its existing average daily flow is approximately 243 mgd. The LBWRP has a capacity of 25 mgd and its existing average daily flow is approximately 13 mgd. The No Project/No Construction Alternative would not generate wastewater, therefore, would not impact the capacity for wastewater treatment. This Alternative would result in no demand for wastewater treatment, and therefore no impact, whereas the Project would result in a less than significant impact.

### NO PROJECT/NO CONSTRUCTION ALTERNATIVE CONCLUSION

The No Project/No Construction Alternative would have no significant impacts because no development would occur. Under this Alternative, no mitigation would be required to reduce potential significant impacts to a less than significant level. All impact areas which were anticipated to cause an environmental impact due to implementation of the Project would be avoided under the No Project/No Construction Alternative. However, the No Project/No Construction Alternative fails to meet the Project's basic objectives. The No Project/No Construction Alternative would fail to further implementation of the ABCSP and help address the

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<sup>4</sup> Burk, Ray, Golden State Water Company, personal communication, March 4, 2022.



City's RHNA housing obligations by developing vacant and underutilized ABCSP land with new infill mixed-use and residential uses.

### 2.5.3 “No Project/Existing Land Use Designation” Alternative

#### DESCRIPTION OF ALTERNATIVE

The Project constitutes a development project on identifiable property. Thus, in this instance, the “no project” alternative is the circumstance under which the Project would not proceed, but the existing environmental conditions would not be preserved.

As previously noted, the General Plan designates the Project site as Gateway Community Commercial,<sup>5</sup> which provides for a complimentary mix of job-creating industrial and manufacturing uses, and local/regional-serving commercial retail and office uses. The City's Zoning Map classifies the Project site as ABCSP.<sup>6</sup> The ABCSP establishes the City's vision for a 21-acre area along Artesia Boulevard, between Gridley Road and Pioneer Boulevard. For Quadrant 2, the City's primary goal is to establish a retail, commercial, and industrial center. Within the ABCSP, the Project site is currently zoned Heavy Manufacturing and Industrial (M-2). The M-2 zone is intended for properties to be developed with manufacturing and warehousing activities which typically use heavy equipment, a moderate number of raw materials and products, and which use processes requiring careful environmental monitoring.

Based on a 3.3-acre (143,748 SF) Project site and a maximum allowable Floor-Area-Ratio (FAR) of 1.5,<sup>7</sup> the maximum allowable development on the Project site is 215,622 SF of manufacturing and industrial uses. The Project site is currently vacant. Thus, the “No Project/Existing Land Use Designation” Alternative discussed below assumes development of the Project site consistent with the General Plan and ABCSP allowed density and intensity. **Table 2-1: No Project/Existing Land Use Designation Alternative Compared to Project**, compares development under the No Project/Existing Land Use Designation Alternative according to General Plan and ABCSP maximum allowable development capacity with development under the Project. As indicated in **Table 2-1**, the No Project/Existing Land Use Designation Alternative would result in 215,622 SF of industrial (i.e., a warehouse) development. It is assumed that the remainder of the Project site would be developed with associated surface parking. Overall, this Alternative proposes approximately 52 percent more gross floor area (GFA) (+74,152 GFA) than the Project.

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<sup>5</sup> City of Artesia. (2010), City of Artesia General Plan 2030. Exhibit LU-3: General Plan 2030 Land Use. <http://www.cityofartesia.us/DocumentCenter/View/226/Artesia-General-Plan?bidId=>. Accessed March 1, 2023.

<sup>6</sup> City of Artesia. (2019). Zoning Map. <https://www.cityofartesia.us/DocumentCenter/View/1877/Zoning-Map-January-7-2019?bidId=>. Accessed March 1, 2023.

<sup>7</sup> City of Artesia. (2011), Artesia Boulevard Corridor Specific Plan. Exhibit 3-1: Allowable Floor Area Ratio. Page 61. <https://www.cityofartesia.us/DocumentCenter/View/586/Artesia-Blvd-Corridor-Specific-Plan?bidId=>.

Table 2-1: No Project/Existing Land Use Designation Alternative Compared To Proposed Project							
Land Use	Residential		Non-Residential (GSF)				
	Units	GSF	Office	Restaurant	Retail	Industrial	Total
NO PROJECT/EXISTING LAND USE DESIGNATION ALTERNATIVE							
Industrial (Manufacturing/Warehouse)	-	-	-	-	-	215,622	215,622
Total	0	0	0	0	0	215,622	215,622
Total GSF	215,622						
PROPOSED PROJECT							
Townhomes	59	89,736	-	-	-	-	-
Mixed-Use Carriage Townhomes (Commercial Ground Floor)	4	6,032	-	1,725	1,725	-	3,450
Shopkeeper Units (Commercial Condominiums with Townhomes above)	8	12,998	-	1,332	1,332	-	2,664
Commercial	-	6,150	-	1,350	1,350	-	2,700
Live/Work Townhomes	9	15,297	2,443	-	-	-	2,443
Total	80	130,213	2,443	4,407	4,407	0	11,257
Total GSF	141,470						
Difference between No Project/Existing Land Use Designation Alternative and Proposed Project	-80 (-100%)	130,213 (-100%)	-2,443 (-100%)	-4,407 (-100%)	-4,407 (-100%)	+215,622 (+100%)	+204,365 (+1,815%)
Difference between No Project/Existing Land Use Designation Alternative and Proposed Project GSF	+74,152 (+52%)						
Notes: GSF = gross square feet.							

## IMPACTS COMPARISON TO THE PROPOSED PROJECT

### Air Quality

The Project would not increase the frequency or severity of an existing air quality violation or cause or contribute to new violations for these pollutants. As shown in **Table 2-2: No Project/Existing Land Use Alternative Construction Air Pollutant Emissions** and **Table 2-3: No Project/Existing Land Use Alternative Operational Air Pollutant Emissions**, the Project would not exceed any of the CAAQS and NAAQS, the Project would also not delay timely attainment of air quality standards or interim emission reductions specified in the 2016 and 2022 AQMPs. In addition, because the Project would not conflict with growth projections that form the basis of the 2016 and 2022 AQMPs, the Project would be consistent with the 2016 and 2022 AQMP emissions forecasts. As shown in **Table 2-2** and **Table 2-3** below, like the Project, this Alternative would not exceed any of the CAAQS and NAAQS, this Alternative would also not delay timely attainment of air quality standards or interim emission reductions specified in the 2016 and 2022 AQMPs. In addition, this Alternative is consistent with the General Plan and, therefore is also consistent with the growth projections that form the basis of the 2016 and 2022 AQMPs. Therefore, both this Alternative and the Project would have a less than significant impact concerning a conflict with or obstruction of the 2016 and 2022 AQMPs.



Table 2-2: No Project/Existing Land Use Alternative Construction Air Pollutant Emissions						
Construction Year	Maximum Daily Criteria Air Pollutant Emissions (lb./day)					
	VOC	NO <sub>x</sub>	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>Proposed Project</b>						
Year 2023	0.95	4.44	40.01	0.07	10.10	5.42
Year 2024	1.42	6.10	53.58	0.09	4.17	1.87
Year 2025	10.13	3.60	23.34	0.05	1.54	0.45
<b>South Coast AQMD Threshold</b>	<b>75</b>	<b>100</b>	<b>550</b>	<b>150</b>	<b>150</b>	<b>55</b>
<b>Exceed South Coast AQMD Threshold?</b>	No	No	No	No	No	No
<b>No Project/Existing Land Use Alternative</b>						
Year 2023	0.95	4.44	40.01	0.07	10.10	5.42
Year 2024	1.42	6.10	53.58	0.09	4.17	1.87
<b>South Coast AQMD Threshold</b>	<b>75</b>	<b>100</b>	<b>550</b>	<b>150</b>	<b>150</b>	<b>55</b>
<b>Exceed South Coast AQMD Threshold?</b>	No	No	No	No	No	No
VOC = Volatile Organic Compounds; NO <sub>x</sub> = Nitrogen Oxides; CO = Carbon Monoxide; SO <sub>2</sub> = Sulfur Dioxide; PM <sub>10</sub> = Particulate Matter 10 microns in diameter or less; PM <sub>2.5</sub> = Particulate Matter 2.5 microns in diameter or less						
Source: CalEEMod version 2020.4.0. Refer to <b>DEIR Appendix 4.1-1</b> and <b>PR-DEIR Appendix A</b> for model outputs.						

As shown in **Table 2-2**, the Project's construction-related criteria pollutant emissions would remain below their respective thresholds; therefore, Project construction impacts would be less than significant. Like the Project, this Alternative's construction-related criteria pollutant emissions would remain below their respective thresholds; therefore, like the Project, this Alternative's construction impacts would be less than significant. Notwithstanding, both the Project and this Alternative would be subject to compliance with South Coast AQMD Rules 402, 403, and 1113 to further minimize construction impacts.

Table 2-3: No Project/Existing Land Use Alternative Operational Air Pollutant Emissions						
Source	Maximum Daily Criteria Air Pollutant Emissions (lb./day)					
	ROG	NO <sub>x</sub>	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>Proposed Project</b>						
<b>Total Emissions</b>	8.34	5.99	59.49	0.15	11.96	3.30
<b>South Coast AQMD Threshold</b>	<b>55</b>	<b>55</b>	<b>550</b>	<b>150</b>	<b>150</b>	<b>55</b>
<b>Exceeds Threshold?</b>	No	No	No	No	No	No
<b>No Project/Existing Land Use Alternative Operational Air Pollutant Emissions</b>						
<b>Total Emissions</b>	9.57	6.43	50.73	0.12	13.07	3.6
<b>South Coast AQMD Threshold</b>	<b>55</b>	<b>55</b>	<b>550</b>	<b>150</b>	<b>150</b>	<b>55</b>
<b>Exceeds Threshold?</b>	No	No	No	No	No	No
ROG = Reactive Organic Gases; NO <sub>x</sub> = Nitrogen Oxides; CO = Carbon Monoxide; SO <sub>2</sub> = Sulfur Dioxide; PM <sub>10</sub> = Particulate Matter 10 microns in diameter or less; PM <sub>2.5</sub> = Particulate Matter 2.5 microns in diameter or less						
Source: CalEEMod version 2020.4.0. Refer to <b>DEIR Appendix 4.1-1</b> and <b>PR-DEIR Appendix A</b> for model outputs.						

The Project's operational emissions would be associated with area sources (e.g., landscape maintenance equipment, architectural coatings, off-road equipment, etc.), energy sources, mobile sources (i.e., motor vehicle use), and off-road equipment. Primary sources of operational criteria pollutants would be from motor vehicle use and area sources. **Table 2-3** provides the Project's estimated operational criteria pollutant emissions and indicates these emissions would remain below South Coast AQMD significance thresholds. Therefore, the Project's operational air pollutant emissions would be less than significant, and no mitigation is required. Like the Project,

this Alternative's operational emissions would be associated with area sources (e.g., landscape maintenance equipment, architectural coatings, off-road equipment, etc.), energy sources, mobile sources (i.e., motor vehicle use and truck traffic), and off-road equipment. Primary sources of operational criteria pollutants would be from motor vehicle use and area sources. As shown in **Table 2-3**, although this Alternative's operational air pollutant emissions would be greater than the Project, they would remain below South Coast AQMD significance thresholds. Therefore, like the Project, this Alternative's operational air pollutant emissions would be less than significant, and no mitigation would be required.

Concerning the Project's ability to result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or State ambient air quality standard, Appendix D of the South Coast AQMD *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution* (2003) notes that projects resulting in emissions not exceeding the project-specific South Coast AQMD regional thresholds of significance should result in a less than significant impact on a cumulative basis unless there is other pertinent information to the contrary. Therefore, like the Project, this Alternative would not result in a cumulatively considerable contribution to significant cumulative air quality impacts. Since neither the Project nor this Alternative's operational emissions would exceed the South Coast AQMD thresholds, neither would represent a cumulatively considerable contribution to significant cumulative air quality impacts and impacts would be less than significant.

Concerning the Project's ability to expose sensitive receptors to substantial pollutant concentrations, the Project would emit pollutants during construction and operations, but would not result in significant concentrations of pollutants at nearby sensitive receptors as all criteria pollutant emissions would remain below their respective thresholds. The No Project/Existing Land Use Designation Alternative would also emit pollutants during construction and operations, and these pollutant concentrations would be greater than the Project because this Alternative proposes approximately 52 percent more floor area (+74,152 GSF) than the Project and thus would require more construction work. Therefore, this Alternative would expose sensitive receptors to pollutant concentrations greater than the Project. However, since approximately 52 percent more construction and operational pollutant emissions would not exceed, nor do they come close to exceeding the South Coast AQMD thresholds, it is assumed that this Alternative would not result in significant concentrations of pollutants at nearby sensitive receptors.

Concerning the Project's ability to generate a CO hot spot in the context of South Coast AQMD's CO Hotspot Analysis, since the Project would not produce the volume of traffic required to generate a CO hot spot, impacts would be less than significant. This Alternative would generate approximately 1,384 daily trips, which is approximately 51 percent fewer daily trips (-1,474 daily trips) than the Project's 2,585 daily trips.<sup>8</sup> Therefore, like this Project, this Alternative would have a less than significant impact concerning generation of a CO hot spot.

The Health Risk Assessment (HRA) determined that the Project would require implementation of mitigation measure (MM) **AQ-1**, which requires the use of Tier 4 Final construction equipment, proper construction equipment maintenance, limited onsite idling, and onsite electrical hook ups

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<sup>8</sup> Daily trip value represents the highest daily trip generation from CalEEMod outputs (i.e., the highest value from Weekday, Saturday, and Sunday).

for construction tools. With **MM AQ-1** incorporated, the Project's offsite construction cancer risk would be reduced to 2.25 in one million, which would be below the South Coast AQMD threshold of 10 in one million. This Alternative's construction-related pollutant emissions would be greater than the Project given this Alternative would involve approximately 52 percent more construction (+74,152 GSF) than the Project. However, like the Project, this Alternative would be able to mitigate its cancer risk to below the South Coast AQMD's 10 in one million threshold. As mentioned above, **MM AQ-1** would reduce the Project's cancer risk to 2.25 in one million. Since this Alternative proposes approximately 52 percent more floor area than the Project, it can be reasonably assumed that this Alternative would have a cancer risk approximately 52 percent greater than the Project, which using the Project's mitigated cancer risk of 2.25 in one million as a baseline, would yield a cancer risk for this Alternative of approximately 3.4 in one million, which would be below the South Coast AQMD's threshold of 10 in one million. Therefore, it can be reasonably assumed that this Alternative's impacts concerning offsite construction health risk would be less than significant with similar mitigation incorporated, as the Project.

Similarly, the HRA also evaluated impacts from the State Route (SR)-91 freeway to future onsite sensitive receptors (i.e., future residents). Project operations would have a less than significant impact concerning the exposure of future sensitive receptors to substantial pollutant concentrations, as all criteria pollutant emissions would remain below their respective thresholds. This Alternative proposes an industrial development and associated parking, which would not involve any future sensitive receptors on the Project site. Impacts concerning onsite workers would be less than those to residents residing on-site since they would only be on-site for approximately 40 hours per week, as opposed to 24/7 for the Project.

Overall, like the Project, this Alternative's impacts concerning air quality would be less than significant or less than significant with mitigation incorporated.

### Cultural Resources

The Project would result in no impact on historical resources and a less than significant impact with mitigation incorporated concerning archaeological resources. These potential Project impacts would occur also with the No Project/Existing Land Use Designation Alternative, as site redevelopment would result in similar ground-disturbing activities, but such impacts would be less than significant with mitigation incorporated.

### Energy

The Project would result in construction-related energy consumption from water usage for dust control, diesel fuel consumption from on-road hauling trips and off-road construction diesel equipment, and gasoline consumption from on-road worker commute and vendor trips. However, the Project would result in less than significant impacts concerning construction-related energy usage since wasteful, inefficient, or unnecessary consumption of energy resources would not occur following compliance with Title 24 requirements. Under the No Project/Existing Land Use Alternative, the construction-related energy usage from water usage for dust control, diesel fuel consumption from on-road hauling trips and off-road construction diesel equipment, and gasoline consumption from on-road worker commute and vendor trips would be greater than the Project since this Alternative would involve 52 percent more construction (+74,152 GSF). Both this Alternative and the Project would result in less than significant impacts concerning wasteful,

inefficient, or unnecessary consumption of energy resources, during Project construction. However, proportionately more construction-related energy usage would occur under this Alternative than the Project.

The Project's operational energy consumption would occur from building energy use (i.e., electricity and natural gas), water use, and transportation-related fuel use. As indicated in **DEIR Table 4.3-4: Project and Countywide Energy Consumption**, the Project's operational electrical energy consumption totals 945,973 kilowatt hours (kWh), constituting approximately 0.001 percent of the County's electricity consumption. The Project would adhere to all federal, State, and local requirements for energy efficiency, including the Title 24 standards. As such, the Project would not result in the inefficient, wasteful, or unnecessary consumption of building electrical or natural gas energy, resulting in a less than significant impact concerning energy. The No Project/Existing Land Use Alternative would involve approximately 52 percent more GFA (+74,152 GSF) than the Project. The characteristics of energy use under this Alternative would differ, as compared to the Project because of different land uses. However, both this Alternative and the Project would result in less than significant impacts concerning wasteful, inefficient, or unnecessary consumption of energy resources during operations. The No Project/Existing Land Use Alternative's annual operational electrical energy consumption totals approximately 2.3 million kWh (see **PR-DEIR Appendix A**) constituting approximately 0.003 percent of the County's electricity consumption. Therefore, the operational electrical use under this Alternative would be greater than the Project. However, warehouses typically do not use natural gas and do not include the extension of natural gas infrastructure to a site. Concerning automobile fuel consumption, the Alternative would likely result in greater diesel fuel usage associated with trailer truck operations. Like the Project, this Alternative would adhere to all federal, State, and local requirements for energy efficiency, including the Title 24 standards. As such, like the Project, this Alternative would not result in the inefficient, wasteful, or unnecessary consumption of building electrical or natural gas energy, resulting in a less than significant impact concerning energy.

Neither the Project nor this Alternative would conflict with any federal, State, or local plans for renewable energy and energy efficiency. Because the Project and this Alternative would comply with Title 24 Parts 6 and 11, no conflict with existing energy standards and regulations would occur under either this Alternative or the Project. Therefore, both the Project and this Alternative's impacts concerning renewable energy or energy efficiency plans would be less than significant.

### **Geology and Soils (Paleontological Resources)**

The Project would result in less than significant impacts with mitigation incorporated concerning paleontological resources. These potential Project impacts would occur also with the No Project/Existing Land Use Designation Alternative, as this Alternative would result in similar ground-disturbing activities.

### **Greenhouse Gas Emissions**

The Project would result in less than significant impacts from short-term GHG emissions associated with construction activities, direct operational GHG emissions from operational vehicular traffic, onsite combustion of natural gas, and landscaping equipment, and indirect operational GHG emissions from offsite generation of electrical power, and the energy required to convey water to, and wastewater from the Project site. The No Project/Existing Land Use Designation Alternative

would involve approximately 52 percent more floor area (+74,152 GSF) than the Project and a longer construction schedule. As with the Project, this Alternative would result in short-term construction-related, direct operational, and indirect operational GHG emissions. Under this Alternative, the approximate quantity of daily construction-related GHG emissions would be the same or similar to the Project but would occur over a longer time period. As shown in **Table 2-4: No Project/Existing Land Use Alternative Operational Greenhouse Gas Emissions**, although this Alternative's GHG emissions would be greater than the Project, both the Project and this Alternative's unmitigated emissions would not exceed the City's 3,000 metric tons of carbon dioxide equivalent (MTCO<sub>2</sub>e) per year threshold. Therefore, both this Alternative and the Project would result in a less than significant impact concerning GHG emissions.

Table 2-4: No Project/Existing Land Use Alternative Operational Greenhouse Gas Emissions	
Emissions Source	MTCO <sub>2</sub> e Emissions Per Year
<b>Proposed Project</b>	
<b>TOTAL</b>	<b>2,070</b>
<i>Threshold</i>	3,000
<b>Exceeds Threshold?</b>	<b>No</b>
<b>No Project/Existing Land Use Designation Alternative</b>	
<b>TOTAL</b>	<b>2,308</b>
<i>Threshold</i>	3,000
<b>Exceeds Threshold?</b>	<b>No</b>

Source: CalEEMod version 2020.4.0. Refer to **DEIR Appendix 4.1-1** and **PR-DEIR Appendix A** for model outputs.

## Land Use and Planning

To implement the Project, the Applicant would require several discretionary permits/approvals, including a General Plan Amendment and Zone Change, among others; see **DEIR Section 2.8: Agreements, Permits, and Approvals**. The Project's land use plan, policy, and regulation consistency issues would be less than significant after discretionary approvals/permits. The No Project/Existing Land Use Designation Alternative would be consistent with the General Commercial land use designation, thus, would not require a General Plan Amendment. This Alternative would also be consistent with the ABCSP zoning as the City's primary goal for Quadrant 2 (where the Project site is located) is "to establish a retail, commercial, and industrial center...no residential uses shall be permitted within this quadrant."<sup>9</sup> As the No Project/Existing Land Use Designation Alternative proposes only industrial uses, it would be consistent with the ABCSP zoning and would not require the Zoning Code Text Amendment.

Although this Alternative would avoid the Project's required General Plan and Zoning Code Text Amendments, neither the No Project/Existing Land Use Designation Alternative nor the Project would cause a significant environmental impact due to a conflict with any plan, policy, or regulation adopted to avoid or mitigate an environmental effect. Although the No Project/Existing Land Use Designation Alternative would not require the Project's requested General Plan Amendment and Zoning Code Text Amendment, this Alternative would still proceed through the City's standard entitlement review process, which would include a Design Review of the proposed

<sup>9</sup> Ibid.

physical plan, pursuant to AMC §9-2.2001. Therefore, impacts would be less than significant concerning land use and planning for both the Project and this Alternative.

#### Noise

The Project's construction noise levels would not exceed the applicable FTA noise standards at the noise sensitive receptors nearest the Project site and construction would occur pursuant to the City's Noise Ordinance, resulting in less than significant impacts. The Project's construction-related vibration impacts would also be less than significant because vibration velocities would be below the FTA PPV thresholds for building damage and human annoyance. Under the No Project/Existing Land Use Designation Alternative, there would be more construction activities but they would occur at similar distances from the sensitive noise receptors. Like the Project, construction-related noise and vibration impacts under this Alternative would be less than significant.

The Project would result in less than significant operational mobile source noise impacts from offsite traffic noise. Although offsite roadway traffic noise levels would increase, the Project's estimated noise increases along study area roadways are considered negligible given that traffic volumes would not be doubled (which would be needed to generate a noticeable noise increase). The No Project/Existing Land Use Designation Alternative could result in greater mobile source noise impacts than the Project since this Alternative would involve truck traffic. However, like the Project, this Alternative's noise increases are presumed to be negligible since traffic noise level increases along study area roadways would not be noticeable.

As shown in **DEIR Table 4.7-11: Stationary Source Noise Levels**, the Project's stationary source noise levels, which account for onsite noise sources (i.e., mechanical equipment, parking area, truck deliveries, trash/recycling collection, and land maintenance) would be below the City's significance thresholds at noise sensitive receptors, resulting in less than significant impacts. The No Project/Existing Land Use Designation Alternative would generate similar stationary source noise levels associated with mechanical equipment, parking areas, trash/recycling collection, and land maintenance as the Project, which are similarly expected to be below the City's significance thresholds at noise-sensitive receptors. However, in addition, the trucks associated with warehouse use would generate noise during loading and unloading activities from diesel engines, exhaust systems, and brakes during low gear shifting braking activities; backing up toward the loading docks; dropping down the dock ramps; and maneuvering away from the docks. Typically, heavy truck operations generate a noise level of 68 dBA at a distance of 30 feet. The sensitive receptors nearest the Project site are approximately 300 feet to the south. Even without attenuation, stationary source noise impacts under this Alternative would be expected to be less than significant. However, as this Alternative does not propose residential uses along Alburdis Avenue, this Alternative would avoid the Project's less than significant with mitigation incorporated onsite stationary noise impact from the existing concrete plant. This Alternative would have a less than significant impact concerning noise, whereas the Project's noise impacts would be less than significant with mitigation incorporated.

#### Population and Housing

The Project proposes 80 DU and approximately 11,257 GSF of non-residential (commercial and office) land uses. The Project would increase the City's housing stock and population (270 growth in population) by approximately 1.7 percent over existing conditions, and generate



approximately 30 new jobs; see **DEIR Table 4.8-7: City Housing, Population, and Employment Forecasts (Existing With Project Conditions)**. Under this Alternative, no population growth would occur because no housing would be constructed. Although this Alternative could induce population growth in the City through construction of an employment-generating land use (i.e., warehouse), it is anticipated that the jobs generated by this Alternative would be filled by persons already residing in the City. Neither the Project nor the No Project/Existing Land Use Designation Alternative would result in any significant impacts concerning substantial unplanned population growth. However, this Alternative would not be in furtherance of the City meeting its 6<sup>th</sup> Cycle RHNA allocation. This Alternative would result in no population growth, whereas the Project would result in less than significant population growth.

### Public Services and Recreation

The Project would generate an incremental increase in demands for fire and police protection, and library services. However, because the Project site is in a developed area where these services and equipment/infrastructure are already in place, the Project would not require construction of new or physically altered fire, police, and library facilities, resulting in a less than significant impact. Also, the Project is forecast to generate a student population growth of approximately 43 students at the ABCUSD, which would incrementally increase the demand for school facilities and services. However, there is student capacity at schools throughout the ABCUSD, and with payment of school impact fees in accordance with SB 50, Project impacts would be fully mitigated and no physical impacts concerning school facilities would occur. Because the No Project/Existing Land Use Designation Alternative would not construct housing, there would be no direct demand for school or library facilities. Similarly, there would be no direct demand for fire or police protection associated with residential uses. However, this Alternative would construct warehouse uses with approximately 52 percent more GFA than the Project. Like the Project, this Alternative would incrementally increase demands on fire and police protection services, but to a greater degree than the Project. Notwithstanding, neither this Alternative nor the Project would result in a significant impact concerning fire protection and police protection services, as neither would result in an adverse physical impact associated with the provision of new or physically altered fire, police, school, or library facilities.

The Project's forecast population growth would incrementally increase the use of existing neighborhood and regional parks and/or other recreational facilities. However, the incremental increase in use of existing recreational facilities resulting from the Project would not be such that substantial physical deterioration of existing facilities would occur or be accelerated given the Project would provide onsite open space and recreational facilities, and would be subject to payment of DIFs. Because the No Project/Existing Land Use Designation Alternative does not propose residential uses, this Alternative would not incrementally increase the use of existing facilities.

Neither this Alternative nor the Project would result in adverse physical impacts associated with park facilities, since neither proposes to provide or physically alter a park facility. The Project does propose onsite open space and recreational amenities (i.e., pool and pool building), which would result in a less than significant physical effect on the environment with mitigation incorporated. The environmental effects of the Project's proposed open spaces and recreational amenities would be avoided with this Alternative, as no recreational uses would be developed.

Like the Project, the No Project/Existing Land Use Designation would not result in adverse physical impacts associated with the provision of new or physically altered governmental facilities because development would occur in an urbanized area already served by public services, and construction of such facilities would not be required. Although the Project's impacts from construction of recreational facilities would be less than significant with mitigation incorporated, this Alternative would avoid such impacts altogether. Therefore, this Alternative would avoid construction and operational impacts associated with recreational facilities, whereas the Project's impacts would be less than significant with mitigation incorporated.

### Transportation

The Project would have a less than significant impact concerning conflict with a program, plan, ordinance, or policy addressing the circulation system. The No Project/Existing Land Use Designation would similarly result in less than significant impacts on the circulation system, since this Alternative would not generate population growth but would generate additional employment, resulting in demands on transit, roadway, bicycle, and pedestrian facilities similar to the Project.

The Project would have a less than significant impact concerning conflict or inconsistency with State CEQA Guidelines §15064.3(b). As shown in **DEIR Table 4.10-2**, the Project's VMT per Capita is 11.3, which is less than the County's threshold of 16.8 percent below existing Citywide or Countywide VMT (or 11.6 VMT per Capita); accordingly, the Project's residential component is presumed to result in a less than significant transportation impact concerning VMT. Additionally, the Project's non-residential components were each screened from further analysis and presumed to have a less than significant transportation impact concerning VMT. The No Project/Existing Land Use Designation Alternative proposes 215,622 GSF of warehouse uses, which, would not meet any of the VMT screening criteria and would not be screened out from VMT analysis. Therefore, it cannot be presumed to have a less than significant transportation impact concerning VMT without conducting a detailed study. This Alternative would require Transportation Demand Management (TDM) strategies to reduce VMT impacts. Although, the effectiveness of TDM measures and reduction of VMT impacts below thresholds cannot be ensured, using CalEEMod defaults, it was determined that this Alternative would likely generate a total VMT of approximately 4,250,380, which is approximately 24 percent less than the Project's estimated total VMT of approximately 5,602,750. Therefore, it can be reasonably assumed that this Alternative would have similar or less impacts concerning a potential conflict with State CEQA Guidelines §15064.3(b), as the Project. Both this Alternative and the Project would have a less than significant impact concerning State CEQA Guidelines §15064.3(b).

The Project's proposed land uses are typical of urban areas and do not involve use of any incompatible vehicles or onsite equipment, such as farm equipment that could create a transportation hazard. Therefore, the Project would not create transportation hazards due to incompatible uses, and impacts would be less than significant. A less than significant impact would occur with this Alternative because, like the Project, this Alternative's proposed land uses are typical of urban areas and do not involve use of any incompatible vehicles or onsite equipment, such as farm equipment that could create a transportation hazard and its circulation improvements would be subject to review and approval by City and County departments.



Project construction would result in less than significant impacts concerning emergency access. The No Project/Existing Land Use Designation Alternative would result in similar construction activities; thus, it would also result in less than significant impacts concerning emergency access during construction. Further, the Project and this No Project/Existing Land Use Designation Alternative would be subject to compliance with General Plan Policy SAF 5.1.2, which requires the City and associated public services departments (e.g., Police Department and Fire Department) to review development proposals for potential impacts to the provision of emergency services. Therefore, the Project and this No Project/Existing Land Use Designation Alternative would result in less than significant impacts concerning inadequate emergency access during their operations. Overall, both this Alternative and the Project would result in less than significant impacts concerning transportation.

### **Tribal Cultural Resources**

The Project would result in a less than significant impact with mitigation incorporated concerning tribal cultural resources. These potential Project impacts would occur also with this Alternative, as similar ground-disturbing activities would occur.

### **Utilities and Service Systems**

The Project would require relocation/construction of new water, wastewater, stormwater, electricity, natural gas, and telecommunication facilities but these improvements would be limited to connections to existing nearby facilities, resulting in less than significant impacts with mitigation incorporated. Given the Project site was formerly occupied by an industrial use, similar to the Project, the utility improvements required under this Alternative would be limited to connections to existing nearby facilities. Therefore, like the Project, utility relocation/construction under this Alternative would not cause significant environmental effects with mitigation incorporated.

As shown in **DEIR Table 4.12-7**, the Project's water demand is estimated to total approximately 31.23 AFY, which represents approximately 0.6 percent of the UWMP's projected 2025 water demand of 5,109 AFY. GSWC has confirmed there would be sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years, resulting in a less than significant impact.<sup>10</sup> This Alternative proposes no housing, but approximately 52 percent more floor area (+74,152 GSF) than the Project. As shown in **Table 2-5: No Project/Existing Land Use Designation Alternative Estimated Project Water Demand**, this Alternative's water demand is estimated to total approximately 121.18 AFY, which is nearly three times (+288 percent or +89.95 AFY) more than the Project. This Alternative's water demand would account for approximately 2.4 percent of the UWMP's projected 2025 water demand thus, it is unknown if there would be sufficient water supplies available to serve this Alternative and reasonably foreseeable development. Consequently, this Alternative could require mitigation, which may include mandatory water efficiency measures to reduce this Alternative's water demands and impacts to a less than significant level. Therefore, this Alternative would result in a less than significant impact with mitigation incorporated concerning water demand, whereas the Project would result in a less than significant impact with no mitigation required.

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<sup>10</sup> Burk, Ray, Golden State Water Company, personal communication, March 4, 2022.

Table 2-5: No Project/Existing Land Use Designation Alternative Estimated Project Water Demand			
Land Use	Amount	Water Demand Factor	Estimated Water Demand (AFY)
<b>Proposed Project</b>			
Residential:	80 DU	0.374101 AFY/DU	29.93
Restaurant: Restaurant	4,407 SF	0.000119 AFY/SF	0.52
Retail: Store	4,407 SF	0.000119 AFY/SF	0.52
Office: Office Building	2,443 SF	0.000108 AFY/SF	0.26
<b>Total</b>			<b>31.23</b>
<b>No Project/Existing Land Use Designation Alternative</b>			
Industrial	215,622 SF	0.000562	121.18
<b>Total</b>			<b>121.18</b>
<b>Difference between No Project/Existing Land Use Designation Alternative and Proposed Project</b>			<b>+89.95 (+288%)</b>
Note: DU= dwelling units, SF= square feet, AFY=Acre-feet per year			
Source: City of Artesia. (2010). City of Artesia General Plan 2030 Environmental Impact Report, Table 5.12-8 General Plan Update Water Demand.			

As shown in **Table 2-6: No Project/Existing Land Use Designation Alternative Estimated Project Wastewater Generation**, the Project would generate approximately 20,937 gpd (0.02 mgd) of wastewater, which would be treated at LACSD's JWPCP or the LBWRP. The JWPCP has a capacity of 400 mgd and its existing average daily flow is approximately 243 mgd. The LBWRP has a capacity of 25 mgd and its existing average daily flow is approximately 13 mgd. As shown in **Table 2-6: No Project/Existing Land Use Designation Alternative Estimated Project Wastewater Generation**, this Alternative's wastewater generation is estimated to total approximately 5,391 gpd, which is approximately one-quarter (-126 percent or -26,325 gpd) the Project's wastewater generation. As with the Project, this Alternative would increase the quantity of wastewater treated at either JWPCP or LBWRP, but with payment of appropriate fees and compliance with established regulatory framework, would not result in a determination by LACSD that it does not have adequate capacity to serve the Alternative's projected demand in addition to the provider's existing commitments. Therefore, as with the Project, this Alternative would result in a less than significant impact concerning wastewater treatment.

Table 2-6: No Project/Existing Land Use Designation Alternative Estimated Project Wastewater Generation				
Land Use	Amount	Unit of Measure	Gallons Per Day (gpd)	Estimated Wastewater Generation (gpd)
Proposed Project				
Residential: Condominiums	80 DU	DU	195	15,600
Restaurant: Restaurant	4.407 KSF	KSF	1,000	4,407
Retail: Store	4.407 KSF	KSF	100	441
Office: Office Building	2.443 KSF	KSF	200	489
Total				20,937 (0.02 mgd)
No Project/Existing Land Use Designation Alternative				
Industrial: Warehousing	215.622 KSF	KSF	25	5,391
Total				5,391 (0.005 mgd)
Difference between No Project/Existing Land Use Designation Alternative and Proposed Project				-26,325 (-126%)
Notes: DU= dwelling units, , gpd= gallons per day, KSF = Thousand Square Feet, mgd = million gallons per day				
Source: Los Angeles County Sanitation District. Will Serve Program, Table 1: Loadings for Each Class of Land Use.				

## NO PROJECT/EXISTING LAND USE DESIGNATION ALTERNATIVE CONCLUSION

The No Project/Existing Land Use Designation Alternative would involve 215,622 SF of industrial uses and associated parking. This Alternative involves approximately 52 percent more floor area (+74,152 GSF), as compared to the Project. The increase in floor area would result in proportionate increases in impacts. Impacts would be similar to, or less than, the Project, as identified in **Table 2-15: Comparison of Alternatives**.

As mentioned in **Section 2.4.2: Impacts That Can Be Mitigated To Below A Level Of Significance**, Project impacts associated with air quality, cultural resources, geology and soils, noise, public services and recreation, and tribal cultural resources would be potentially significant, but would be reduced to a less than significant level with mitigation incorporated.

Like the Project, this Alternative assumes that the entire site would be graded. Therefore, for environmental issues where site disturbance would be the same for the Project and the No Project/Existing Land Use Designation Alternative, there would be no change in the significance of potential impacts. This would be the case for cultural resources, geology and soils (paleontological resources), and tribal cultural resources. As with the Project, this Alternative's impacts would be less than significant with mitigation incorporated.

Concerning air quality, although this Alternative would generate more air pollutant emissions which would expose nearby sensitive receptors to substantial pollutant concentrations, like the Project, impacts would be less than significant with mitigation incorporated. Therefore, this Alternative would not substantially lessen the Project's impacts concerning air quality.

Since this Alternative does not propose residential uses along Alburdis Avenue, this Alternative would avoid the Project's impact concerning a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance. Mitigation would not be required to reduce impacts to a less than significant level. Therefore, this Alternative would substantially lessen the Project's impacts concerning noise from a less than significant impact with mitigation incorporated to a less than significant impact.

Since this Alternative does not propose residential uses nor requires the construction or expansion of recreational facilities, this Alternative would avoid the Project's impact concerning the construction or expansion of recreational facilities that may have an adverse physical effect on the environment. Mitigation would not be required to reduce impacts to a less than significant level. Therefore, this Alternative would lessen the Project's impacts concerning recreation from a less than significant impact with mitigation incorporated to a less than significant impact.

However, as shown in **Table 2-16: Comparison of Alternative's Ability to Meet Project Objectives**, the No Project/Existing Land Use Designation Alternative fails to meet the Project's basic objectives and would only partially fulfill some of the Project objectives. Although this Alternative would meet the Project's underlying purpose to further implementation of the ABCSP for Quadrant 2, which calls for a mix of commercial, industrial, and retail, it would not help address the City's RHNA housing obligations by developing vacant and underutilized ABCSP land with new infill mixed-use and residential uses.

## 2.5.4 “All-Commercial” Alternative

### DESCRIPTION OF ALTERNATIVE

Table 2-7: All-Commercial Alternative Compared To Proposed Project						
Land Use	Residential		Non-Residential (GSF)			
	Units	GSF	Office	Restaurant	Retail	Total
ALL-COMMERCIAL ALTERNATIVE						
Commercial	-		71,874	71,874	71,874	215,622
Total	0		71,874	71,874	71,874	215,622
Total GSF	215,622					
PROPOSED PROJECT						
Townhomes	59	89,736	-	-	-	-
Mixed-Use Carriage Townhomes (Commercial Ground Floor)	4	6,032	-	1,725	1,725	3,450
Shopkeeper Units (Commercial Condominiums with Townhomes above)	8	12,998	-	1,332	1,332	2,664
Commercial	-	6,150	-	1,350	1,350	2,700
Live/Work Townhomes	9	15,297	2,443	-	-	2,443
Total	80	130,213	2,443	4,407	4,407	11,257
Total GSF	141,470					
Difference between All-Commercial Alternative and Proposed Project	-80 (-100%)	-130,213 (-100%)	+69,431 (+2,842%)	+67,467 (+1,531%)	+67,467 (+1,531%)	+204,365 (+1,815%)
Difference between All-Commercial Alternative and Proposed Project GSF	+74,152 (+52.4%)					
Notes: DU = dwelling units; and GSF = gross square feet.						

The “All-Commercial” Alternative assumes the development of the Project site with only commercial uses as compared to the Project’s mixed uses. The ABCSP establishes that the maximum allowable FAR for the Project site is 1.5<sup>11</sup> and the Project site is 3.3 acres (143,748 SF). Therefore, this Alternative assumes the development of the Project site with approximately 215,622 GSF of commercial uses. **Table 2-7: All-Commercial Alternative Compared to The Project**, presents development under the All-Commercial Alternative and compares it to development under the Project. As indicated in **Table 2-7** and for analysis purposes, the All-Commercial Alternative is assumed to include 215,622 SF of non-residential land uses, including an equal mix (i.e., 71,874 GSF each) of office, retail, and restaurant uses. This Alternative would construct multiple commercial buildings on the vacant Project site. Comparatively, this Alternative proposes approximately 1,815 percent more non-residential floor area (+204,365 GSF) than the Project, including approximately 2,842 percent more office space (+69,431 GSF), approximately 1,531 percent more restaurant space (+67,467 GSF), and approximately 1,531 percent more retail space (+67,467 GSF). Overall, this Alternative proposes approximately 52 percent more GFA (+74,152 GFA) than the Project.

<sup>11</sup> City of Artesia. (2011), *Artesia Boulevard Corridor Specific Plan, Exhibit 3-1: Allowable Floor Area Ratio*. Page 61.  
<https://www.cityofartesia.us/DocumentCenter/View/586/Artesia-Blvd-Corridor-Specific-Plan?bidId=> . Accessed March 1, 2023.

## IMPACTS COMPARISON TO THE PROPOSED PROJECT

### Air Quality

The Project would not increase the frequency or severity of an existing air quality violation or cause or contribute to new violations for these pollutants. As shown in **Table 2-8: All-Commercial Alternative Construction Air Pollutant Emissions** and **Table 2-9: All-Commercial Alternative Operational Air Pollutant Emissions**, the Project would not exceed any of the CAAQS and NAAQS, the Project would also not delay timely attainment of air quality standards or interim emission reductions specified in the 2016 and 2022 AQMPs. In addition, because the Project would not conflict with growth projections that form the basis of the 2016 and 2022 AQMPs, the Project would be consistent with the 2016 and 2022 AQMP's emissions forecasts. As shown in **Table 2-2** and **2-3** below, like the Project, this Alternative would not exceed any of the CAAQS and NAAQS, this Alternative would also not delay timely attainment of air quality standards or interim emission reductions specified in the 2016 and 2022 AQMPs. In addition, this Alternative is consistent with the General Plan and, therefore is also consistent with the growth projections that form the basis of the 2016 and 2022 AQMPs. Therefore, both this Alternative and the Project would have a less than significant impact concerning a conflict with or obstruction of the 2016 and 2022 AQMPs.

Table 2-8: All-Commercial Alternative Construction Air Pollutant Emissions						
Construction Year	Maximum Daily Criteria Air Pollutant Emissions (lb./day)					
	VOC	NO <sub>x</sub>	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>Proposed Project</b>						
Year 2023	0.95	4.44	40.01	0.07	10.10	5.42
Year 2024	1.42	6.10	53.58	0.09	4.17	1.87
Year 2025	10.13	3.60	23.34	0.05	1.54	0.45
<b>South Coast AQMD Threshold<sup>5</sup></b>	<b>75</b>	<b>100</b>	<b>550</b>	<b>150</b>	<b>150</b>	<b>55</b>
<b>Exceed South Coast AQMD Threshold?</b>	No	No	No	No	No	No
<b>All-Commercial Alternative</b>						
Year 2023	0.95	4.44	40.01	0.07	10.10	5.42
Year 2024	1.42	6.10	53.58	0.09	4.17	1.87
<b>South Coast AQMD Threshold<sup>5</sup></b>	<b>75</b>	<b>100</b>	<b>550</b>	<b>150</b>	<b>150</b>	<b>55</b>
<b>Exceed South Coast AQMD Threshold?</b>	No	No	No	No	No	No
VOC = Volatile Organic Compounds; NO <sub>x</sub> = Nitrogen Oxides; CO = Carbon Monoxide; SO <sub>2</sub> = Sulfur Dioxide; PM <sub>10</sub> = Particulate Matter 10 microns in diameter or less; PM <sub>2.5</sub> = Particulate Matter 2.5 microns in diameter or less						
Source: CalEEMod version 2020.4.0. Refer to <b>DEIR Appendix 4.1-1</b> for model outputs.						

As shown in **Table 2-8**, the Project's construction-related criteria pollutant emissions would remain below their respective thresholds; therefore, Project construction impacts would be less than significant. Although this Alternative's construction air pollutant emissions would be greater than the Project, like the Project, this Alternative's construction-related pollutant emissions would remain below their respective thresholds. Therefore, like the Project, this Alternative's construction impacts would be less than significant. Notwithstanding, both the Project and this Alternative would be subject to compliance with South Coast AQMD Rules 402, 403, and 1113 to further minimize construction impacts.

Table 2-9: All-Commercial Alternative Operational Air Pollutant Emissions						
Source	Maximum Daily Criteria Air Pollutant Emissions (lb./day)					
	ROG	NO <sub>x</sub>	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>Proposed Project</b>						
<b>Total Emissions</b>	8.34	5.99	59.49	0.15	11.96	3.30
<b>South Coast AQMD Threshold</b>	<b>55</b>	<b>55</b>	<b>550</b>	<b>150</b>	<b>150</b>	<b>55</b>
<b>Exceeds Threshold?</b>	No	No	No	No	No	No
<b>All-Commercial Alternative Operational Air Pollutant Emissions</b>						
<b>Total Emissions</b>	33.71	29.9	232.64	0.46	47.62	13.17
<b>South Coast AQMD Threshold</b>	<b>55</b>	<b>55</b>	<b>550</b>	<b>150</b>	<b>150</b>	<b>55</b>
<b>Exceeds Threshold?</b>	No	No	No	No	No	No
<small>ROG = Reactive Organic Gases; NO<sub>x</sub> = Nitrogen Oxides; CO = Carbon Monoxide; SO<sub>2</sub> = Sulfur Dioxide; PM<sub>10</sub> = Particulate Matter 10 microns in diameter or less; PM<sub>2.5</sub> = Particulate Matter 2.5 microns in diameter or less</small>						
<small>Source: CalEEMod version 2020.4.0. Refer to <b>DEIR Appendix 4.1-1</b> for model outputs.</small>						

The Project's operational emissions would be associated with area sources (e.g., landscape maintenance equipment, architectural coatings, off-road equipment, etc.), energy sources, mobile sources (i.e., motor vehicle use), and off-road equipment. Primary sources of operational criteria pollutants would be from motor vehicle use and area sources. **Table 2-9** provides the Project's estimated operational criteria pollutant emissions and indicates these emissions would remain below South Coast AQMD significance thresholds. Therefore, the Project's operational air pollutant emissions would be less than significant, and no mitigation is required. Like the Project, this Alternative's operational emissions would be associated with area sources (e.g., landscape maintenance equipment, architectural coatings, off-road equipment, etc.), energy sources, mobile sources (i.e., motor vehicle use), and off-road equipment. Primary sources of operational criteria pollutants would be from motor vehicle use and area sources. As shown in **Table 2-9**, this Alternative's operational air pollutant emissions would remain below South Coast AQMD significance thresholds. Therefore, like the Project, this Alternative's operational air pollutant emissions would be less than significant, and no mitigation would be required.

Concerning the Project's ability to result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or State ambient air quality standard, Appendix D of the South Coast AQMD *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution* (2003) notes that projects resulting in emissions not exceeding the project-specific South Coast AQMD regional thresholds of significance should result in a less than significant impact on a cumulative basis unless there is other pertinent information to the contrary. Therefore, like the Project, this Alternative would not result in a cumulatively considerable contribution to significant cumulative air quality impacts. Since neither the Project nor this Alternative's operational emissions would exceed the South Coast AQMD thresholds, neither would represent a cumulatively considerable contribution to significant cumulative air quality impacts and impacts would be less than significant.

Concerning the Project's ability to expose sensitive receptors to substantial pollutant concentrations, the Project would emit pollutants during construction and operations, but would not result in significant concentrations of pollutants at nearby sensitive receptors as all criteria pollutant emissions would remain below their respective thresholds. The All-Commercial



Alternative would also emit pollutants during construction and operations, and these pollutant concentrations would be greater than the Project because this Alternative involves approximately 52 percent more floor area (+74,152 GSF), than the Project, and thus would require more construction work. Therefore, this Alternative would expose sensitive receptors to pollutant concentrations greater than the Project. However, since approximately 52 percent more construction and operational emissions would not exceed, nor do they come close to exceeding the South Coast AQMD threshold, it is assumed that this Alternative would not result in significant concentrations of pollutants at nearby sensitive receptors.

Concerning the Project's ability to generate a CO hot spot in the context of South Coast AQMD's CO Hotspot Analysis, since the Project would not produce the volume of traffic required to generate a CO hot spot, impacts would be less than significant. This Alternative would generate approximately 11,948 daily trips, which is over three times (+327 percent, or +9,363 daily trips) more than the Project's 2,585 trips.<sup>12</sup> However, based on South Coast AQMD's CO Hotspot Analysis, this increase would not be enough to exceed the 35-ppm federal standards. Therefore, although incrementally greater, like this Project, this Alternative would have a less than significant impact concerning generation of a CO hot spot.

The HRA determined the Project would require implementation of **MM AQ-1**, which requires the use of Tier 4 Final construction equipment, proper construction equipment maintenance, limited onsite idling, and onsite electrical hook ups for construction tools. With **MM AQ-1** incorporated, the Project's offsite construction cancer risk would be reduced to 2.25 in one million, which would be below the South Coast AQMD threshold of 10 in one million. This Alternative's construction-related pollutant emissions would be greater than the Project given this Alternative would involve construction of approximately 52 percent more construction (+74,152 GSF) than the Project. However, like the Project, this Alternative would be able to mitigate its cancer risk to below the South Coast AQMD's 10 in one million threshold. As mentioned above, **MM AQ-1** would reduce the Project's cancer risk to 2.25 in one million. Since this Alternative proposes approximately 52 percent more floor area than the Project, it can be reasonably assumed that this Alternative would have a cancer risk approximately 52 percent greater than the Project, which using the Project's mitigated cancer risk of 2.25 in one million as a baseline, would yield a cancer risk for this Alternative of approximately 3.4 in one million, which is below the South Coast AQMD's threshold of 10 in one million. Therefore, it can be reasonably assumed that this Alternative's impacts concerning offsite construction health risk would be less than significant with similar mitigation incorporated, as the Project.

Similarly, the HRA also evaluated impacts from SR-91 to future onsite sensitive receptors (i.e., future residents). Project operations would have a less than significant impact concerning the exposure of future sensitive receptors to substantial pollutant concentrations, as all criteria pollutant emissions would remain below their respective thresholds. This Alternative proposes commercial development and associated parking, which would not involve any future sensitive receptors on the Project site. Impacts concerning onsite workers would be less than those to residents residing

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<sup>12</sup> Daily trip value represents the highest daily trip generation from CalEEMod outputs (i.e., the highest value from Weekday, Saturday, and Sunday)



on-site since they would only be on-site for approximately 40 hours per week, as opposed to 24/7 for the Project.

Overall, like the Project, this Alternative's impacts concerning air quality would be less than significant or less than significant with mitigation incorporated.

### Cultural Resources

The Project would result in no impact on known historical resources and a less than significant impact with mitigation incorporated concerning archaeological resources. These potential Project impacts would occur also with this Alternative, as site redevelopment would result in similar ground-disturbing activities.

### Energy

The Project would result in construction-related energy consumption from water usage for dust control, diesel fuel consumption from on-road hauling trips and off-road construction diesel equipment, and gasoline consumption from on-road worker commute and vendor trips. However, the Project would result in less than significant impacts concerning construction-related energy usage since wasteful, inefficient, or unnecessary consumption of energy resources would not occur following compliance with Title 24 requirements. Under the All-Commercial Alternative, the construction-related energy usage from water usage for dust control, diesel fuel consumption from on-road hauling trips and off-road construction diesel equipment, and gasoline consumption from on-road worker commute and vendor trips would be greater than the Project since this Alternative would involve approximately 52 percent more construction (+74,152 GSF). Both this Alternative and the Project would result in less than significant impacts concerning wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction. However, proportionately more construction-related energy usage would occur under this Alternative than the Project.

The Project's operational energy consumption would occur from building energy use (i.e., electricity and natural gas), water use, and transportation-related fuel use. As indicated in **DEIR Table 4.3-4: Project and Countywide Energy Consumption**, the Project's operational electrical energy consumption totals 945,973 kilowatt hours (kWh), constituting approximately 0.001 percent of the County's electricity consumption. Further, DEIR Table 4.3-4 indicates the Project's annual operational natural gas energy consumption totals 23,000 therms, constituting approximately 0.001 percent of the County's natural gas consumption. The Project would adhere to all federal, State, and local requirements for energy efficiency, including the Title 24 standards. As such, the Project would not result in the inefficient, wasteful, or unnecessary consumption of building electrical or natural gas energy, resulting in a less than significant impact concerning energy. The Project would be subject to compliance with applicable energy standards. Therefore, Project operations would not result in wasteful, inefficient, or unnecessary consumption of energy resources, resulting in a less than significant impact concerning energy.

Further, the Project would not conflict with/obstruct a State or local plan for renewable energy or energy efficiency.

The All-Commercial Alternative would involve approximately 52 percent more GFA (+74,152 GSF) than the Project. The characteristics of energy use under this Alternative would differ, as compared to the Project because of different land uses. However, both this Alternative and the Project would result in less than significant impacts concerning wasteful, inefficient, or unnecessary consumption of energy resources during operations. The All-Commercial Alternative's annual operational electrical energy consumption totals approximately 4.9 million kWh (see **PR-DEIR Appendix A**) constituting approximately 0.007 percent of the County's annual electrical consumption. Therefore, the operational electrical use under this Alternative would be greater than the Project. Additionally, this Alternative's annual operational natural gas energy consumption total approximately 174,170 therms constituting approximately 0.005 percent of the County's annual natural gas energy consumption. Like the Project, this Alternative would adhere to all federal, State, and local requirements for energy efficiency, including the Title 24 standards. As such, like the Project, this Alternative would not result in the inefficient, wasteful, or unnecessary consumption of building electrical or natural gas energy, resulting in a less than significant impact concerning energy.

Neither the Project nor this Alternative would conflict with any federal, State, or local plans for renewable energy and energy efficiency. Because the Project and this Alternative would comply with Title 24 Parts 6 and 11, no conflict with existing energy standards and regulations would occur under either this Alternative or the Project. Therefore, both the Project and this Alternative's impacts concerning renewable energy or energy efficiency plans would be less than significant.

### Geology and Soils (Paleontological Resources)

The Project would result in a less than significant impact with mitigation incorporated concerning paleontological resources. These potential Project impacts would occur also with the All-Commercial Alternative, as this Alternative would result in similar ground-disturbing activities.

### Greenhouse Gas Emissions

The Project would result in less than significant impacts from short-term GHG emissions associated with construction activities, direct operational GHG emissions from operational vehicular traffic, onsite combustion of natural gas, and landscaping equipment, and indirect operational GHG emissions from offsite generation of electrical power, and the energy required to convey water to, and wastewater from the Project site.

The All-Commercial Alternative would involve approximately 52 percent more floor area (+74,152 GSF) than the Project and a longer construction schedule. As with the Project, this Alternative would result in short-term construction-related, direct operational, and indirect operational GHG emissions. Under this Alternative, the approximate quantity of daily construction-related GHG emissions would be the same or similar to the Project but would occur over a longer time period. Like the Project, this Alternative's operational emission sources would include energy, vehicles, waste, water, and wastewater. As shown in **Table 2-10: All-Commercial Alternative Operational Greenhouse Gas Emissions**, this Alternative's unmitigated emissions would exceed the City's 3,000 MTCO<sub>2e</sub> per year threshold, whereas the Project's unmitigated emissions would not. As the effectiveness of GHG emissions reduction measures and reduction of GHG impacts below thresholds cannot be ensured, this Alternative's GHG impact is therefore considered significant

and unavoidable. In contrast, the Project would result in a less than significant impact concerning GHG emissions with no mitigation incorporated.

Table 2-10: All-Commercial Alternative Operational Greenhouse Gas Emissions	
Emissions Source	MTCO <sub>2</sub> e Emissions Per Year
<b>Proposed Project</b>	
<b>TOTAL</b>	<b>2,070</b>
<i>Threshold</i>	3,000
<b>Exceeds Threshold?</b>	<b>No</b>
<b>All-Commercial Alternative</b>	
<b>TOTAL</b>	<b>8,882</b>
<i>Threshold</i>	3,000
<b>Exceeds Threshold?</b>	<b>Yes</b>
Source: CalEEMod version 2020.4.0. Refer to <b>DEIR Appendix 4.5-1</b> for model outputs.	

### Land Use and Planning

To implement the Project, the Applicant would require several discretionary permits/approvals, including a General Plan Amendment and Zone Change, among others; see **DEIR Section 2.8: Agreements, Permits, and Approvals**. The Project's land use plan, policy, and regulation consistency issues would be less than significant after discretionary approvals/permits. The All-Commercial Alternative would be consistent with the General Commercial land use designation, thus, would not require a General Plan Amendment. This Alternative would also be consistent with the ABCSP zoning as the City's primary goal for Quadrant 2 (where the Project site is located) is "to establish a retail, commercial, and industrial center... no residential uses shall be permitted within this quadrant."<sup>13</sup> As the All-Commercial Alternative only proposes commercial uses, it would be consistent with the ABCSP zoning and would not require the Zoning Code Text Amendment.

Although this Alternative would avoid the Project's proposed General Plan and Zoning Code Text Amendments, neither the All-Commercial Alternative nor the Project would cause a significant environmental impact due to a conflict with any plan, policy, or regulation adopted to avoid or mitigate an environmental effect. Under this Alternative, none of the Project's requested entitlements would be implemented and no impact would occur. Although this Alternative would not require the Project's requested General Plan Amendment and Zoning Code Text Amendment, this Alternative would still proceed through the City's standard entitlement review process, which would include a Design Review of the proposed physical plan, pursuant to AMC §9-2.2001. Therefore, impacts would be less than significant concerning land use and planning for both the Project and this Alternative.

### Noise

The Project's construction noise levels would not exceed the applicable FTA noise standards at the nearest sensitive receptors and construction would occur during the City's allowable construction hours. The Project's construction-related noise impacts would be less than significant. The Project's construction-related vibration impacts would also be less than significant because vibration velocities would be below the FTA PPV thresholds for building damage and human

<sup>13</sup> Ibid.

annoyance. Under the All-Commercial Alternative, construction activities would be greater but would occur at similar distances from the sensitive receptors. Like the Project, construction-related noise and vibration impacts under this Alternative would be less than significant.

The Project would result in less than significant operational mobile source noise impacts from offsite traffic noise. The All-Commercial Alternative could result in greater offsite traffic noise impacts than the Project since this Alternative would generate approximately 11,948 daily trips, which is over three times (+327 percent or +9,363 daily trips) the Project's 2,585 daily trips.<sup>14</sup> Since noticeable noise increases are typically generated by a doubling of traffic volumes, the All-Commercial Alternative could result in a noticeable noise increase over existing conditions. Further study is required to determine if this Alternative could cause a substantial permanent increase in traffic noise levels above the City's noise standards. As the feasibility and effectiveness of noise reduction measures and reduction of noise impacts below thresholds cannot be ensured, this Alternative's offsite noise impact is therefore considered significant and unavoidable.

As shown in **DEIR Table 4.7-11**, the Project's stationary source noise levels, which account for onsite noise sources (i.e., mechanical equipment, parking area, truck deliveries, trash/recycling collection, and land maintenance) would be below the City's significance thresholds at noise sensitive receptors, resulting in a less than significant impact. The All-Commercial Alternative would generate similar stationary source noise levels, but to a greater degree, from mechanical equipment, parking areas, trash/recycling collection, and land maintenance, than the Project, which are similarly expected to be below the City's significance thresholds at noise-sensitive receptors. However, as this Alternative does not propose residential uses along Alburdis Avenue, this Alternative would avoid the Project's less than significant with mitigation impact concerning onsite stationary noise from the existing concrete plant. This Alternative would avoid the Project's mitigation concerning onsite stationary noise from the existing concrete plant, but would potentially introduce a significant and unavoidable impact concerning offsite mobile source noise.

### Population and Housing

The Project proposes 80 DU and approximately 11,257 GSF of non-residential (commercial and office) land uses, which would generate approximately 30 jobs. The Project would increase the City's housing stock and population (270 growth in population) by approximately 1.7 percent over existing conditions; see **DEIR Table 4.8-7: City Housing, Population, and Employment Forecasts (Existing With Project Conditions)**. Under this Alternative, no population growth would occur because no housing would be constructed. Although this Alternative could induce population growth in the City through construction of an employment-generating land use (i.e., commercial uses), it is anticipated that the jobs generated by this Alternative would be filled by persons already residing in the City. Neither the Project nor the All-Commercial Alternative would result in significant impacts concerning substantial unplanned population growth. However, this Alternative would not be in furtherance of the City meeting its 6<sup>th</sup> Cycle RHNA allocation.

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<sup>14</sup> Daily trip value represents the highest daily trip generation from CalEEMod outputs (i.e., the highest value from Weekday, Saturday, and Sunday)

## **Public Services and Recreation**

The Project would generate an incremental increase in demands for fire and police protection, and library services. However, because the Project site is in a developed area where these services and equipment/infrastructure are already in place, the Project would not require the construction of new or physically altered fire, police, or library facilities, resulting in a less than significant impact. Also, the Project is forecast to generate a student population growth of approximately 43 students at the ABCUSD, which would incrementally increase the demand for school facilities and services. However, there is student capacity at schools throughout the ABCUSD, and with payment of school impact fees in accordance with SB 50, Project impacts would be fully mitigated and no physical impacts concerning school facilities would occur. Because the All-Commercial Alternative would not construct any housing, there would be no direct demand for school or library facilities. Similarly, there would be no direct demand for fire or police protection associated with residential uses. However, this Alternative would construct commercial uses with approximately 52 percent more GFA than the Project. Like the Project, this Alternative would incrementally increase demands on fire and police protection services, but to a greater degree than the Project. Notwithstanding, neither this Alternative nor the Project would result in a significant impact concerning fire protection and police protection services, as neither would result in an adverse physical impact associated with the provision of new or physically altered fire, police, school, or library facilities.

The Project's forecast population growth would incrementally increase the use of existing neighborhood and regional parks and/or other recreational facilities. However, the incremental increase in use of existing recreational facilities resulting from the Project would not be such that substantial physical deterioration of existing facilities would occur or be accelerated given the Project would provide onsite open space and recreational facilities, and would be subject to payment of DIFs. Because the All-Commercial Alternative does not propose residential uses, this Alternative would not incrementally increase the use of existing facilities.

Neither this Alternative nor the Project would result in adverse physical impacts associated with park facilities, since neither proposes to provide or physically alter a park facility. The Project does propose onsite open space and recreational amenities (i.e., pool and pool building), which would result in a less than significant physical effect on the environment with mitigation incorporated. The environmental effects of the Project's proposed open spaces and recreational amenities would be avoided with this Alternative, as no recreational uses would be developed.

Like the Project, the All-Commercial Alternative would not result in adverse physical impacts associated with the provision of new or physically altered governmental facilities because development would occur in an urbanized area already served by public services, and construction of such facilities would not be required. Although the Project's impacts from construction of recreational facilities would be less than significant with mitigation incorporated, this Alternative would avoid such impacts altogether. Therefore, this Alternative would avoid construction and operational recreational impacts associated with the Project, whereas the Project's recreational impacts would be less than significant with mitigation incorporated.

## Transportation

The Project would have a less than significant impact concerning conflict with a program, plan, ordinance, or policy addressing the circulation system. The All-Commercial Alternative would similarly result in a less than significant impact on the circulation system, since this Alternative would not generate population growth, but would generate additional employment, resulting demands on transit, roadway, bicycle, and pedestrian facilities.

The Project would have a less than significant impact concerning conflict or inconsistency with State CEQA Guidelines § 15064.3(b). As shown in **DEIR Table 4.10-2**, the Project's VMT per Capita is 11.3, which is less than the County's threshold of 16.8 percent below existing Citywide or Countywide VMT (or 11.6 VMT per Capita); accordingly, the Project's residential component is presumed to result in a less than significant transportation impact concerning VMT. Additionally, the Project's non-residential components were each screened from further analysis and presumed to have a less than significant transportation impact concerning VMT.

The All-Commercial Alternative proposes 215,622 GSF of commercial uses, which would not meet any of the VMT screening criteria and would not be screened out from VMT analysis. Therefore, it cannot be presumed to have a less than significant transportation impact concerning VMT without conducting a detailed study. Therefore, this Alternative would require TDM strategies to reduce VMT impacts. However, the effectiveness of TDM measures and reduction of VMT impacts below thresholds cannot be ensured. Using CalEEMod defaults, it was determined that this Alternative would likely generate a total VMT of approximately 18,812,959, which is approximately three times greater than the Project's estimated total VMT of approximately 5,602,750. Therefore, this Alternative's VMT impact is considered significant and unavoidable. This Alternative would result in a significant an unavoidable impact concerning VMT, whereas the Project would result in a less than significant impact.

The Project's proposed land uses are typical of urban areas and do not involve use of any incompatible vehicles or onsite equipment, such as farm equipment that could create a transportation hazard. Therefore, the Project would not create transportation hazards due to incompatible uses, and impacts would be less than significant. A less than significant impact would occur with this Alternative because, like the Project, this Alternative's proposed land uses are typical of urban areas and do not involve use of any incompatible vehicles or onsite equipment, such as farm equipment that could create a transportation hazard and its circulation improvements would be subject to review and approval by City and County departments.

Project construction would result in less than significant impacts concerning emergency access. The All-Commercial Alternative would result in similar construction activities; thus, it would also result in less than significant impacts concerning emergency access during construction. Further, the Project and this All-Commercial Alternative would be subject to compliance with General Plan Policy SAF 5.1.2, which requires the City and associated public services departments (e.g., Police Department and Fire Department) to review development proposals for potential impacts to the provision of emergency services. Therefore, the Project and the All-Commercial Alternative would result in less than significant impacts concerning inadequate emergency access during their operations. Overall, this Alternative would have a significant and unavoidable impact whereas the Project would result in less than significant impacts concerning transportation.



## Tribal Cultural Resources

The Project would result in less than significant impact with mitigation incorporated concerning tribal cultural resources. These potential Project impacts would occur also with this Alternative, as similar ground-disturbing activities would occur.

## Utilities and Service Systems

The Project would require relocation/construction of new water, wastewater, stormwater, electricity, natural gas, and telecommunication facilities but these improvements would be limited to connections to existing nearby facilities, resulting in less than significant impacts with mitigation incorporated. Similar to the Project, the utility improvements required under this Alternative would be limited to connections to existing nearby facilities. Therefore, like the Project, utility relocation/construction under this Alternative would not cause significant environmental effects with mitigation incorporated.

As shown in **DEIR Table 4.12-7**, the Project's water demand is estimated to total approximately 31.23 AFY, which represents approximately 0.6 percent of the UWMP's projected 2025 water demand. GSWC has confirmed there would be sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years, resulting in a less than significant impact. This Alternative proposes no housing, but approximately 52 percent more floor area (+74,152 GSF) than the Project. As shown in **Table 2-11: All-Commercial Alternative Estimated Project Water Demand**, this Alternative's water demand is estimated to total approximately 24.87 AFY, which is approximately 20.4 percent less water demand (-6.36 AFY) than the Project. This Alternative's water demand would account for approximately 0.4 percent of the UWMP's projected 2025 water demand, thus, there would be sufficient water supplies available to serve this Alternative and reasonably foreseeable development. Both this Alternative and the Project would result in a less than significant impact concerning water demand.

Table 2-11: All-Commercial Alternative Estimated Project Water Demand			
Land Use	Amount	Water Demand Factor	Estimated Water Demand (AFY)
<b>Proposed Project</b>			
Residential:	80 DU	0.374101 AFY/DU	29.93
Restaurant: Restaurant	4,407 SF	0.000119 AFY/SF	0.52
Retail: Store	4,407 SF	0.000119 AFY/SF	0.52
Office: Office Building	2,443 SF	0.000108 AFY/SF	0.26
<b>Total</b>			<b>31.23</b>
<b>All-Commercial Alternative</b>			
Restaurant: Restaurant	71,874 SF	0.000119 AFY/SF	8.55
Retail: Store	71,874 SF	0.000119 AFY/SF	8.55
Office: Office Building	71,874 SF	0.000108 AFY/SF	7.76
<b>Total</b>			<b>24.87</b>
<b>Difference between All-Commercial Alternative and Proposed Project</b>			<b>-6.36 (-20.4%)</b>
Note: DU= dwelling units, SF= square feet, AFY=Acre-feet per year			
Source: City of Artesia. (2010). <i>City of Artesia General Plan 2030 Environmental Impact Report</i> , Table 5.12-8.			

As shown in **Table 2-12: All-Commercial Alternative Estimated Project Wastewater Generation**, the Project would generate approximately 20,937 gpd (0.02 mgd) of wastewater, which would be



treated at LACSD's Joint Water Pollution Control Plant (JWPCP) or the Long Beach Water Reclamation Plant (LBWRP). The JWPCP has a capacity of 400 mgd and its existing average daily flow is approximately 243 mgd. The LBWRP has a capacity of 25 mgd and its existing average daily flow is approximately 13 mgd. As with the Project, this Alternative would increase the quantity of wastewater treated at either JWPCP or LBWRP, but with payment of appropriate fees and compliance with established regulatory framework, would not result in a determination by LACSD that it does not have adequate capacity to serve the Alternative's projected demand in addition to the provider's existing commitments. Therefore, as with the Project, this Alternative would result in a less than significant impact concerning wastewater treatment.

Table 2-12: All-Commercial Alternative Estimated Project Wastewater Generation				
Land Use	Amount	Unit of Measure	Gallons Per Day (gpd)	Estimated Wastewater Generation (gpd)
<b>Proposed Project</b>				
Residential: Condominiums	80 DU	DU	195	15,600
Restaurant: Restaurant	4,407 KSF	KSF	1,000	4,407
Retail: Store	4,407 KSF	KSF	100	441
Office: Office Building	2,443 KSF	KSF	200	489
<b>Total</b>				<b>20,937 (0.02 mgd)</b>
<b>All-Commercial Alternative</b>				
Restaurant: Restaurant	71,874 KSF	KSF	1,000	71,874
Retail: Store	71,874 KSF	KSF	100	7,187
Office: Office Building	71,874 KSF	KSF	200	14,375
<b>Total</b>				<b>93,436 (0.09 mgd)</b>
<b>Difference between All-Commercial Alternative and Proposed Project</b>				<b>+72,499 (+346.3%)</b>
Notes: DU= dwelling units, gpd= gallons per day, KSF = Thousand Square Feet, mgd = million gallons per day				
Source: Los Angeles County Sanitation District. Will Serve Program, Table 1: Loadings for Each Class of Land Use.				

## ALL-COMMERCIAL ALTERNATIVE CONCLUSION

The All-Commercial Alternative would include 215,622 SF of commercial uses and associated parking. This is approximately 52 percent more floor area (+74,152 GSF), as compared to the Project. The increase in GSF would have a proportionate increase in impacts, as compared to the Project. Impacts would be similar, less, or greater than the Project, as identified in **Table 2-15: Comparison of Alternatives**.

As mentioned in **Section 2.4.2: Impacts That Can Be Mitigated To Below A Level Of Significance**, Project impacts associated with air quality, cultural resources, geology and soils, noise, public services and recreation, and tribal cultural resources would be potentially significant, but would be reduced to a less than significant level with mitigation incorporated.

Like the Project, this Alternative assumes that the entire site would be graded. Therefore, for environmental issues where site disturbance would be the same for the Project and the All-Commercial Alternative, there would be no change in the significance of potential impacts. This would be the case for cultural resources, geology and soils (paleontological resources), and tribal cultural resources. As with the Project, impacts would be less than significant with mitigation incorporated.

Concerning air quality, although this Alternative would generate greater air pollutant emissions, which would expose the nearby sensitive receptors to substantial pollutant concentrations, like the Project, impacts would be less than significant with similar mitigation. Therefore, this Alternative would not substantially lessen the Project's impacts concerning air quality.

Since this Alternative would result in GHG emissions that exceed the City's 3,000 MTCO<sub>2</sub>e per year threshold, and since the effectiveness of GHG emissions reduction measures and the reduction of GHG impacts below thresholds cannot be ensured, this Alternative's GHG impact is therefore considered significant and unavoidable. Nonetheless, even if GHG mitigation were successfully incorporated and this Alternative's GHG impacts were reduced to a less than significant level, it would result in increased GHG emissions compared to the Project's unmitigated less than significant impact.

Since this Alternative does not propose residential uses along Alburdis Avenue, this Alternative would avoid the Project's impact and mitigation concerning onsite stationary noise from the existing concrete plant. However, this Alternative could result in a noticeable noise increase over existing roadway noise conditions. As such, this Alternative's offsite mobile source noise impact is considered significant and unavoidable. Therefore, this Alternative would potentially substantially increase the Project's impacts concerning noise from a less than significant impact with mitigation incorporated to a significant and unavoidable impact. If incorporation of mitigation were successful in reducing the offsite traffic noise impacts to a less than significant level, this Alternative would have the similar environmental impact as the Project.

Since this Alternative does not propose residential uses nor requires the construction or expansion of recreational facilities, this Alternative would avoid the Project's impact concerning the construction or expansion of recreational facilities that may have an adverse physical effect on the environment. Mitigation would not be required to reduce impacts to a less than significant level. Therefore, this Alternative would substantially lessen the Project's impacts concerning recreation from a less than significant impact with mitigation incorporated to a less than significant impact.

Because this Alternative's daily trip generation is greater than the 110 daily trips threshold recommended by OPR it would not be screened out from VMT analysis. This Alternative would not have a reduction in VMT because the number of employees is expected to increase when compared to the Project. Therefore, this Alternative would require Transportation Demand Management (TDM) strategies to reduce VMT impacts. However, the effectiveness of TDM measures and reduction of VMT impacts below thresholds cannot be ensured. Therefore, this Alternative's VMT impact is considered significant and unavoidable. Nonetheless, even if VMT mitigation were successfully incorporated and this Alternative's VMT impacts were reduced to less than significant, it would result in greater environmental impacts concerning VMT, as compared to the Project's unmitigated less than significant impact.

As shown in **Table 2-16: Comparison of Alternatives' Ability to Meet Project Objectives**, the All-Commercial Alternative fails to meet the Project's basic objectives and would only partially fulfill some of the Project objectives. Although this Alternative would meet the Project's underlying purpose to further implementation of the ABCSP for Quadrant 2, which calls for a mix of commercial, industrial, and retail uses, it would not help address the City's RHNA housing

obligations by developing vacant and underutilized ABCSP land with new infill mixed-use and residential uses.

### 2.5.5 “Reduced Density” Alternative

#### DESCRIPTION OF ALTERNATIVE

The “Reduced Density” Alternative assumes development of the Project site similar to the Project, however, it proposes 64 DU, which is approximately 20 percent fewer DU (-16 DU) than the Project, and proposes 2,168 SF of office space (i.e., approximately 11 percent less office space than the Project) and no restaurant or retail uses, which is approximately 81 percent less non-residential floor area (-9,089 GSF) than proposed by the Project. Overall, this Alternative proposes 136,460 GSF of floor area, which is approximately 4 percent less floor area (-5,010 GSF) than the Project. This Alternative is intended to evaluate the potential for reduced environmental impacts associated with fewer residential DU proposed on the Project site. As previously noted, to allow the proposed development, the Applicant proposes an ABCSP Zoning Code Text Amendment to permit residential uses on the Project site, establish a maximum allowable development within the Project site, and amend the ABCSP’s Design Standards and Guidelines (among other chapters). Additionally, the Project seeks approval of the following entitlements: General Plan Amendment; Design Review; Development Agreement; and Vesting Tentative Tract Map No. 83834. This Alternative would require the same amendments and entitlements, but proposes a reduced maximum density of 18 DU/AC, compared to 30 DU/AC for the Project, within the ABCSP Zoning Code Text Amendment.

**Table 2-13: Reduced Density Alternative Compared to Proposed Project**, presents development under the Reduced Density Alternative and compares it to development under the Project. As indicated in **Table 2-13**, the Reduced Density Alternative excludes the Project’s proposed townhomes, mixed-use carriage townhomes, shopkeeper units, and commercial uses, and instead proposes eight Live/Work Townhomes (one less than the Project), 48 single-family detached DU, and eight single-family attached DU. Overall, this Alternative proposes 64 DU, 2,168 SF of office space (in the live/work units), and 51,917 SF of open space (i.e., common residential, private residential, and live/work plaza and court).

Table 2-13: Reduced Density Alternative Compared To Proposed Project						
Land Use	Residential		Non-Residential (GSF)			
	Units	GSF	Office	Restaurant	Retail	Total
REDUCED DENSITY ALTERNATIVE						
Live/Work Townhomes	8	13,532	2,168	-	-	2,168
Single-Family Detached	48	101,520	-	-	-	-
Single-Family Attached	8	19,240	-	-	-	-
Total	64	134,292	2,168	0	0	2,168
Total GSF	136,460					
PROPOSED PROJECT						
Townhomes	59	89,736	-	-	-	-
Mixed-Use Carriage Townhomes (Commercial Ground Floor)	4	6,032	-	1,725	1,725	3,450
Shopkeeper Units (Commercial Condominiums with Townhomes above)	8	12,998	-	1,332	1,332	2,664

Table 2-13: Reduced Density Alternative Compared To Proposed Project						
Land Use	Residential		Non-Residential (GSF)			
	Units	GSF	Office	Restaurant	Retail	Total
Commercial	-	6,150	-	1,350	1,350	2,700
Live/Work Townhomes	9	15,297	2,443	-	-	2,443
<b>Total</b>	<b>80</b>	<b>130,213</b>	<b>2,443</b>	<b>4,407</b>	<b>4,407</b>	<b>11,257</b>
<b>Total GSF</b>	<b>141,470</b>					
<b>Difference between Reduced Density Alternative and Proposed Project</b>	<b>-16 (-20%)</b>	<b>+4,079 (+3%)</b>	<b>-275 (-11%)</b>	<b>-4,407 (-100%)</b>	<b>-4,407 (-100%)</b>	<b>-9,089 (-81%)</b>
<b>Difference between Reduced Density Alternative and Proposed Project GSF</b>	<b>-5,010 (-4%)</b>					
Notes: DU = dwelling units; and GSF = gross square feet.						

## IMPACTS COMPARISON TO THE PROPOSED PROJECT

### Air Quality

The Project would not increase the frequency or severity of an existing air quality violation or cause or contribute to new violations for these pollutants. As shown in **DEIR Table 4.1-8: Construction Air Pollutant Emissions** and **DEIR Table 4.1-9: Operational Air Pollutant Emissions**, the Project would not exceed any of the CAAQS and NAAQS, the Project would also not delay timely attainment of air quality standards or interim emission reductions specified in the 2016 and 2022 AQMPs. In addition, because the Project would not conflict with growth projections that form the basis of the 2016 and 2022 AQMPs, the Project would be consistent with the 2016 and 2022 AQMP's emissions forecasts. The Project's operational air quality emissions would occur also with the Reduced Density Alternative, however, to a lesser degree due to the exclusion of commercial uses and less residential development, which would result in a corresponding proportional decrease in demand for utilities and VMT (see Transportation below), resulting in lower pollutant emissions. Like the Project, this Alternative would also not delay timely attainment of air quality standards or interim emission reductions specified in the 2016 and 2022 AQMPs.

As shown in **DEIR Table 4.1-8**, the Project's construction-related criteria pollutant emissions would remain below their respective thresholds; therefore, Project construction impacts would be less than significant. Under this Alternative, the construction maximum daily emissions would be the same or similar to the Project, but the construction duration would be shorter due to the exclusion of commercial uses and less residential development. Therefore, like the Project, this Alternative's construction impacts would be less than significant. Notwithstanding, both the Project and this Alternative would be subject to compliance with South Coast AQMD Rules 402, 403, and 1113 to further minimize construction emissions.

Concerning the Project's ability to result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or State ambient air quality standard, Appendix D of the South Coast AQMD *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution* (2003) notes that projects resulting in emissions not exceeding the project-specific South Coast AQMD regional thresholds of significance should result in a less than significant impact on a cumulative basis unless there is other pertinent information to the contrary. Therefore, like the Project and because of the exclusion of commercial uses and less residential development, which would require a shorter construction schedule and result in a corresponding proportional decrease in demand for utilities and VMT (see Transportation below), resulting in lower pollutant emissions, this Alternative would not exceed the South Coast AQMD thresholds and would not result in a cumulatively considerable contribution to significant cumulative air quality impacts. Therefore, Neither the Project nor this Alternative's operational emissions would represent a cumulatively considerable contribution to significant cumulative air quality impacts and impacts would be less than significant.

Concerning the Project's ability to expose sensitive receptors to substantial pollutant concentrations, the Project would emit pollutants during construction and operations, but would not result in significant concentrations of pollutants at nearby sensitive receptors as all criteria pollutant emissions would remain below their respective thresholds. The Reduced Density Alternative would also emit pollutants during construction and operations, however to a lesser degree than the Project due to the exclusion of commercial uses and less residential



development. Therefore, this Alternative would expose sensitive receptors to pollutant concentrations less than the Project and, like the Project, impacts would be less than significant with mitigation.

Concerning the Project's ability to generate a CO hot spot in the context of South Coast AQMD's CO Hotspot Analysis, since the Project would not produce the volume of traffic required to generate a CO hot spot, impacts would be less than significant. This Alternative would generate approximately 595 daily trips, which is approximately four times (-23 percent, or -1,990 daily trips) less than the Project's 2,585 trips. Therefore, since this Alternative would produce less traffic than the Project, this Alternative would not exceed the 35-ppm federal standards. Therefore, although incrementally less, like the Project, this Alternative would have a less than significant impact concerning generation of a CO hot spot.

The HRA determined the Project would require implementation of **MM AQ-1**, which requires the use of Tier 4 Final construction equipment, proper construction equipment maintenance, limited onsite idling, and onsite electrical hookups for construction tools. With **MM AQ-1** incorporated, the Project's offsite construction cancer risk would be reduced to 2.25 in one million, which would be below the South Coast AQMD threshold of 10 in one million. This Alternative's construction-related pollutant emissions would be less than the Project given this Alternative would involve approximately 4 percent less construction (-5,010 GSF). Therefore, like the Project, this Alternative would be able to mitigate its cancer risk to below the South Coast AQMD's 10 in one million threshold. As mentioned above, **MM AQ-1** would reduce the Project's cancer risk to 2.25 in one million. Since this Alternative proposes approximately 4 percent less floor area than the Project, it can be reasonably assumed that this Alternative would have a cancer risk approximately 4 percent less than the Project, which using the Project's mitigated cancer risk of 2.25 in one million as a baseline, would yield a cancer risk for this Alternative of approximately 2.16 in one million, which is below the South Coast AQMD's threshold of 10 in one million. Therefore, it can be reasonably assumed that this Alternative's impacts concerning offsite construction health risk would be less than significant with similar mitigation incorporated, as the Project.

Similarly, the HRA also evaluated impacts from SR-91 to future onsite sensitive receptors (i.e., future residents). Project operations would have a less than significant impact concerning the exposure of future sensitive receptors to substantial pollutant concentrations, as all criteria pollutant emissions would remain below their respective thresholds. Like the Project this Alternative's operations would have a less than significant impact concerning the exposure of sensitive receptors to substantial pollutant concentrations, as all criteria emissions would remain below their respective thresholds.

Overall, like the Project, this Alternative's impacts concerning air quality would be less than significant or less than significant with mitigation incorporated.

### Cultural Resources

The Project would result in no impact on known historical resources and a less than significant impact with mitigation incorporated concerning archaeological resources. These potential Project impacts would occur also with this Alternative, as site redevelopment would result in similar ground-disturbing activities.

## **Energy**

The Project would result in construction-related energy consumption from water usage for dust control, diesel fuel consumption from on-road hauling trips and off-road construction diesel equipment, and gasoline consumption from on-road worker commute and vendor trips. However, the Project would result in less than significant impacts concerning construction-related energy usage since wasteful, inefficient, or unnecessary consumption of energy resources would not occur following compliance with Title 24 requirements. Under the Reduced Density Alternative, the construction-related energy usage from water usage for dust control, diesel fuel consumption from on-road hauling trips and off-road construction diesel equipment, and gasoline consumption from on-road worker commute and vendor trips would be less than the Project since this Alternative would involve approximately four percent less construction (-5,010 GSF). Both this Alternative and the Project would result in less than significant impacts concerning wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction. However, proportionately less construction-related energy usage would occur under this Alternative than the Project.

The Project's operational energy consumption would occur from building energy use (electricity and natural gas), water use, and transportation-related fuel use. The Project would be subject to compliance with applicable energy standards. Therefore, Project operations would not result in wasteful, inefficient, or unnecessary consumption of energy resources, resulting in a less than significant impact concerning energy. Further, the Project would not conflict with/obstruct a State or local plan for renewable energy or energy efficiency. Under the Reduced Density Alternative, the operational energy usage from building energy use (electricity and natural gas), water use, and transportation-related fuel use would be less than the Project since this Alternative would involve approximately four percent less construction (-5,010 GSF). Both this Alternative and the Project would result in less than significant impacts concerning wasteful, inefficient, or unnecessary consumption of energy resources during operations. However, proportionately less operational energy usage would occur under this Alternative than the Project. Neither the Project nor this Alternative would conflict with any federal, State, or local plans for renewable energy and energy efficiency. Because the Project and this Alternative would comply with Title 24 Parts 6 and 11, no conflict with existing energy standards and regulations would occur under either this Alternative or the Project. Therefore, both the Project and this Alternative's impacts concerning renewable energy or energy efficiency plans would be less than significant.

## **Geology and Soils (Paleontological Resources)**

The Project would result in less than significant potential impacts with mitigation incorporated concerning paleontological resources. These potential Project impacts would occur also with the Reduced Density Alternative, as this Alternative would result in similar ground-disturbing activities.

## **Greenhouse Gas Emissions**

The Project would result in less than significant impacts from short-term GHG emissions associated with construction activities, direct operational GHG emissions from operational vehicular traffic, onsite combustion of natural gas, and landscaping equipment, and indirect operational GHG emissions from offsite generation of electrical power, and the energy required to convey water to, and wastewater from the Project site. The Reduced Density Alternative would involve the

construction of approximately 20 percent fewer DU and approximately 81 percent less commercial floor area than the Project, which would result in a shorter construction schedule. Both this Alternative and the Project would result in direct emissions of GHGs from construction activities. The approximate quantity of daily GHG emissions generated by construction equipment would be the same or similar to the Project but would occur over a shorter period of time. Once construction is complete, the generation of these GHG emissions would cease. The South Coast AQMD recommends that construction emissions be amortized over a 30-year project lifetime. Therefore, projected GHGs from construction are quantified and amortized over 30 years. The amortized construction emissions are added to the annual average operational emissions.

Operational emission sources include energy, vehicles, waste, water, and wastewater. Amortized construction emissions are added to operational emissions to identify a project's annual carbon dioxide equivalent (CO<sub>2</sub>e). The reduction in development would result in fewer daily vehicle trips, compared to the Project. This decrease would incrementally reduce vehicle trips and associated emissions. Because this Alternative's operational emissions would be less than the Project due to the exclusion of commercial uses and less residential development, like the Project, the Reduced Density Alternative would not exceed the City's threshold of 3,000 MTCO<sub>2</sub>e. Impacts associated with this Alternative and the Project would be less than significant. However, proportionately less energy usage would occur under this Alternative than under the Project, given this Alternative would involve construction of approximately 20 percent fewer DU and approximately 81 percent less commercial floor area, than the Project.

### Land Use and Planning

To implement the Project, the Applicant would require several discretionary permits/approvals, including a General Plan Amendment and Zone Change, among others; see **DEIR Section 2.8: Agreements, Permits, and Approvals**. The Project's land use plan, policy, and regulation consistency issues would be less than significant after discretionary approvals/permits. The Reduced Density Alternative would require similar discretionary permits/approvals as the Project, thus, would similarly result in a less than significant environmental impact due to a conflict with any plan, policy, or regulation adopted to avoid or mitigate an environmental effect. Therefore, both the Reduced Density Alternative and the Project would have a less than significant impact concerning land use and planning.

### Noise

The Project's construction noise levels would not exceed the applicable FTA noise standards at the nearest noise-sensitive receptors and construction would occur pursuant to the City's Noise Ordinance. The Project's construction-related noise impacts would be less than significant. The Project's construction-related vibration impacts would also be less than significant because vibration velocities would be below the FTA PPV thresholds for building damage and human annoyance. Under the Reduced Density Alternative, similar construction activities would occur at similar distances from the sensitive receptors, but over a shorter time period due to the development decrease. Therefore, like the Project, construction-related noise and vibration impacts under this Alternative would be less than significant.

The Project would result in less than significant operational mobile source noise impacts from offsite traffic noise. When compared to the Project, the Reduced Density Alternative would result in less

mobile source noise impacts since this Alternative would generate fewer daily trips given approximately 20 percent fewer DU and approximately 81 percent less commercial floor area would be developed. Therefore, like the Project, operational mobile source noise impacts from offsite traffic noise would be less than significant.

As shown in **DEIR Table 4.7-11**, the Project's stationary source noise levels, which account for onsite noise sources (i.e., mechanical equipment, parking area, truck deliveries, trash/recycling collection, and land maintenance) would be below the City's significance thresholds at noise sensitive receptors, thus, resulting in a less than significant impact. The Reduced Density Alternative would generate similar stationary source noise levels from mechanical equipment, parking areas, trash/recycling collection, and land maintenance as the Project, which are similarly expected to be below the City's significance thresholds at noise-sensitive receptors.

The concrete mixing plant located east of the Project site along Alburdis Avenue and vehicular traffic along Artesia Boulevard located to the south are the primary noise sources in the Project vicinity. Similar to the Project, this Alternative would propose residential uses along Alburdis Avenue that would be within the City's normally unacceptable land use compatibility noise standard of 70-75dBA CNEL for multi-family residential uses. Consequently, like the Project, this Alternative would be required to incorporate mitigation to minimize interior noise levels at habitable rooms of residences along Alburdis Avenue. Therefore, both this Alternative and the Project would have a less than significant impact with mitigation incorporated concerning onsite noise impacts.

### Population and Housing

The Project proposes 80 DU and approximately 11,257 GSF of non-residential (commercial and office) land uses, which would generate approximately 30 jobs. The Project would increase the City's housing stock and population (270 growth in population) by approximately 1.7 percent over existing conditions; see **DEIR Table 4.8-7: City Housing, Population, and Employment Forecasts (Existing With Project Conditions)**. The Project would require both a General Plan Amendment to permit integrated, mixed-use commercial and residential development, as well as a Zoning Code Text Amendment to amend the ABCSP to permit residential uses. Thus, the Project's proposed residential development would induce an unplanned direct population growth in the City of approximately 270 persons. However, this forecast population growth from new housing is not considered substantial in the context of General Plan buildout given it would constitute only approximately 1.52 percent growth over the City's buildout population of approximately 18,347 persons. Further, this forecast population growth from new housing is not considered substantial in the context of SCAG growth forecasts given it would constitute only approximately 1.47 percent over SCAG's forecast population for the City of approximately 17,800 persons. Under the Reduced Density Alternative less population growth (i.e., approximately 54 fewer persons) would occur since less housing units would be developed. Therefore, while proportionately less population and housing impacts would occur under this Alternative than under the Project, both scenarios would have a less than significant impact.

### Public Services and Recreation

Construction-related activities associated with the Project could temporarily increase the demand for fire and police protection services at and near the Project site due to the potential increased hazards associated with construction activities and the use of materials. The Reduced

Density Alternative would result in similar impacts as the Project, as similar construction activities would occur, although potentially to a lesser degree.

The Project proposes 80 DU and commercial and office uses, with a proportionate increase in population and demand for fire protection, police protection, school, park, and library facilities. Because the Project site is in a developed area where these services and facilities are already in place, the Project would not require construction of new or physically altered governmental facilities, thus no environmental impact would occur in this regard. The Reduced Density Alternative's demand for fire protection, police protection, schools, parks, and library facilities would be less than the Project's since approximately 20 percent fewer DU and approximately 81 percent less commercial floor area would be developed. Like the Project, this Alternative would not require construction of new or physically altered governmental facilities, thus no environmental impact would occur in this regard.

The Project's forecasted population growth of 270 persons would create a demand for an additional 0.83-acres of parkland. However, the Project does not propose to provide or physically alter a park facility. Therefore, the Project would not result in adverse physical impacts associated with such facilities. In lieu of constructing additional parkland, the Project would be subject to compliance with City Resolution No. 19-2742, which requires payment of DIFs to mitigate the impacts of new residents and visitors on parks and recreation facilities (i.e., parkland) as a result of new development. Payment of in-lieu fees, as permitted by the Quimby Act, would minimize the Project's impacts concerning demand for parkland. The Reduced Density Alternative's forecasted population growth of 216 persons would create a demand for an additional 0.65-acres of parkland. Since, like the Project, the Reduced Density Alternative does not propose to provide or physically alter a park facility, this Alternative would not result in adverse physical impacts associated with such facilities. Like the Project, the Reduced Density Alternative would be subject to compliance with City Resolution No. 19-2742, which would minimize the Project's impacts concerning demand for parkland. Impacts under both scenarios would be less than significant.

### Transportation

The Project would have a less than significant impact concerning conflict with a program, plan, ordinance, or policy addressing the circulation system. The Reduced Density Alternative would result in less impact on the circulation system compared to the Project, since this Alternative would generate less population growth (i.e., 54 persons less), resulting in less demand on transit, roadway, bicycle, and pedestrian facilities.

As described in **DEIR Section 4.10**, the Project proposes one retail component (8,814 GSF) and two non-retail components (2,442 GSF of office space and 80 DU) that would screen out of VMT analysis.<sup>15</sup> Therefore, the Project's retail component would have a less than significant transportation impact concerning VMT. Since this Reduced Density Alternative does not propose any retail components, this Alternative would have no impacts concerning retail VMT.

The Project's office component would screen out of VMT analysis because it would generate approximately 35 daily trips, which is less than the 110 daily trip screening criteria.<sup>16</sup> The Reduced

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<sup>15</sup> See **DEIR Section 4.10.5: Methodology** for the Vehicle Miles Traveled Screening thresholds.

<sup>16</sup> Ibid.



Density Alternative's office component would generate approximately 32 daily trips, which, like the Project, is less than the 110 daily trip screening criteria and would screen out of VMT analysis. Therefore, both this Alternative and the Project's office component would have a less than significant impact concerning office VMT.

Neither the Project nor this Alternative meet the criteria to be screened out of a VMT analysis based on proximity to transit screening.

The Project's residential component would generate 539 daily trips, which is more than the 110 daily trip screening criteria, thus, would not screen out based on Project Type and Size screening and further VMT analysis was required. As shown in **DEIR Table 4.10-2**, the Project's VMT per Capita is 11.0, which is less than the County's threshold of 16.8 percent below existing Citywide or Countywide VMT (or 11.6 VMT per Capita); accordingly, the Project's residential component is presumed to result in a less than significant transportation impact concerning VMT. **Table 2-14: Proposed Project and Reduced Density VMT Summary** shows calculations for the proposed Project's live/work and shopkeeper adjustments.

Table 2-14: Proposed Project and Reduced Density Alternative VMT Summary		
Efficiency Metric	Proposed Project	Reduced Density Alternative
Total Households	80	64
Total Population	270	216
Total Unadjusted Homebased (HB) VMT	3,267	2,614
HBW Production VMT Live-Work and Shopkeeper Units (Reduction)	-286	-134
Total Adjusted Homebased (HB) VMT	2,981	2,480
Project Residential VMT Per Capita	11.0	11.5
<b>City Threshold (16.8% Below County/City)</b>	<b>11.60</b>	
<b>Significant Impact?</b>	<b>No</b>	<b>No</b>
Source: Kimley-Horn and Associates, Inc. (2023).		

The Reduced Density Alternative's residential component would generate approximately 564 daily trips, which is more than the 110 daily trip screening criteria, thus, like the Project, would not screen out based on Project Type and Size screening. As shown in **Table 2-14**, the Reduced Density Alternative's VMT per Capita would be 11.5, which is less than the City's threshold of 11.6 VMT per Capita; accordingly, the Reduced Density Alternative's residential component is presumed to, like the Project, result in a less than significant transportation impact concerning VMT. Therefore, like the Project, the Reduced Density Alternative would not conflict or be inconsistent with State CEQA Guidelines § 15064.3(b) and impacts would be less than significant.

The Project's proposed land uses are typical of urban areas and do not involve use of any incompatible vehicles or onsite equipment, such as farm equipment that could create a transportation hazard. Therefore, the Project would not create transportation hazards due to incompatible uses, and impacts would be less than significant. A less than significant impact would occur with this Alternative because, like the Project, this Alternative's proposed land uses are typical of urban areas and do not involve use of any incompatible vehicles or onsite

equipment, such as farm equipment that could create a transportation hazard and its circulation improvements would be subject to review and approval by City and County departments.

Project construction would result in less than significant impacts concerning emergency access. The Reduced Density Alternative would result in similar construction activities; thus, would also result in less than significant impacts concerning emergency access. Further, the Project and this Reduced Density Alternative would be subject to compliance with General Plan Policy SAF 5.1.2, which requires the City and associated public services departments (e.g., Police Department and Fire Department) to review development proposals for potential impacts to the provision of emergency services. Therefore, the Project and this Reduced Density Alternative would result in less than significant impacts concerning inadequate emergency access during their operations.

Overall, like the Project, this Alternative's impacts concerning transportation would be less than significant.

### **Tribal Cultural Resources**

The Project would result in a less than significant impact with mitigation incorporated concerning tribal cultural resources. These potential Project impacts would occur also with this Alternative, as similar ground-disturbing activities would occur.

### **Utilities and Service Systems**

The Project would require relocation/construction of new water, wastewater, stormwater, electricity, natural gas, and telecommunication facilities but these improvements would be limited to connections to existing facilities near the Project site, resulting in less than significant impacts with mitigation incorporated. The Reduced Density Alternative would similarly require relocation/construction of new water, wastewater, stormwater, electricity, natural gas, and telecommunication facilities, thus, like the Project, would not cause environmental effects from construction of such facilities. This Alternative and the Project would result in less than significant impacts with mitigation incorporated.

The Project's water demand is estimated to total approximately 31.23 AFY, which represents approximately 0.6 percent of the UWMP's projected 2025 water demand. GSWC has confirmed there would be sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years, resulting in a less than significant impact. The Reduced Density Alternative's water demand and wastewater generation would be less than the Project's since approximately 20 percent fewer DU and approximately 81 percent less commercial floor area would be developed. Thus, there would be sufficient water supplies available to serve this Alternative and reasonably foreseeable development. Both this Alternative and the Project would result in a less than significant impact concerning water demand.

The Project's wastewater generation is estimated to total approximately 20,937 gpd, which would not result in a determination by LACSD that it does not have adequate capacity to serve the Project's wastewater in addition to the provider's existing commitments and a less than significant impact would occur. Because this Alternative would generate less wastewater than the Project, like the Project, the Reduced Density Alternative would not result in a determination by LACSD

that it does not have adequate capacity to serve the Alternative. Both this Alternative and the Project would result in a less than significant impact concerning wastewater treatment.

### **REDUCED DENSITY ALTERNATIVE CONCLUSION**

The Reduced Density Alternative would exclude the Project's proposed townhomes, mixed-use carriage townhomes, shopkeeper units, and commercial uses, and instead proposes eight Live/Work Townhomes (one less than the Project), 48 single-family detached DU, and eight single-family attached DU. Overall, this Alternative proposes 64 DU, 2,168 SF of office space (in the live/work units), and 51,917 SF of open space (i.e., common residential, private residential, and live/work plaza and court). This Alternative's construction of approximately 20 percent fewer DU and approximately 81 percent less commercial floor area than the Project would have a proportionate decrease in impacts. Impacts would be similar to or less than the Project, as identified in **Table 2-15: Comparison of Alternatives**.

The Reduced Density Alternative would fulfill some of the Project objectives and partially fulfill others. This Alternative would provide an infill development that redevelops a large underutilized industrial site within the ABCSP into a new high-quality walkable community with various compatible uses (i.e., single-family detached and attached, live/work townhomes with office uses, and onsite amenities), but would not provide the neighborhood-serving ground floor commercial uses (i.e., retail and restaurant) on Artesia Boulevard, which would generate less employment. This Alternative would not create a mixed-use development that encourages walkability and convenience by providing onsite residential uses and neighborhood-serving restaurant, retail, and commercial uses. This Alternative would address the City's RHNA housing goals by building new residential dwelling units on the site in a manner that minimizes the potential for displacement of existing uses, however, to a lesser degree than the Project. This Alternative would physically and functionally integrate the proposed development with the surrounding ABCSP community by extending the neighborhood urban pattern and surrounding street grid into the site through a series of pedestrian open spaces, but would not include a north-to-south, full site depth, pedestrian access way. This Alternative would not create complementary designs and uses that are compatible with the surrounding neighborhoods and would not continue active ground floor retail/restaurant uses along Artesia Boulevard site frontage or add to the area's mix of uses and businesses. This Alternative would be required to comply with ABCSP Design Standards and Guidelines which would require this Alternative to provide high-quality, varied, and modern architectural and landscape design, viable public and private open space for residents, sufficient off-street parking, and electric appliances and connections.

Compared to the Project, this Alternative would contribute to the City's 6<sup>th</sup> Cycle RHNA allocation to a lesser degree. Also, although this Alternative would address the City's RHNA housing goals by building new residential dwelling units on the site in a manner that minimizes the potential for displacement of existing uses, it would do so to a lesser degree than the Project.

### **2.5.6 Alternatives Considered but Rejected**

In accordance with State CEQA Guidelines §15126.6, 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 the State CEQA Guidelines, among the factors that may be used to eliminate alternatives from detailed consideration are the alternative's failure to meet most of the

basic Project objectives, the alternative's infeasibility, or the alternative's inability to avoid significant environmental impacts.

The State CEQA Guidelines §§15126.6(f)(1) and (2) require the range of alternatives to be governed by the "rule of reason" such that an EIR considers alternatives necessary to permit a reasoned choice and that be limited to one that would avoid or substantially lessen any of the significant effects associated with a Project. The alternatives may take into consideration factors including "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 owned by the proponent)....Only locations that would avoid or substantially lessen any of the significant effects of the project need to be considered for inclusion in the EIR".

An "Alternative Site" Alternative was also considered but rejected given that the Applicant does not have interest in any alternative site within the City- and most notably, none that would be within the ABCSP area. The Applicant also does not own other property in the City or ABCSP area that would meet the Project's development program and objectives. It is speculative "whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site." Should the Project be located at another site in the City or ABCSP area, it is anticipated that the Project would have similar or worse environmental impacts that could require the City to adopt a Statement of Overriding Considerations. Significant unavoidable impacts associated with the development of an alternative site could include construction-related air quality and noise impacts. Therefore, the EIR does not evaluate an alternative site because no other site is known that would definitively "avoid or substantially less any of the significant effects associated with a proposed project."

The City of Artesia, as the Lead Agency, did not identify additional alternatives for consideration.

### 2.5.7 "Environmentally Superior" Alternative

**Table 2-15: Comparison of Alternatives**, summarizes the comparative environmental impact analyses presented above (i.e., the alternatives compared to the Project). State CEQA Guidelines requires that an Environmentally Superior Alternative be identified; that is, an alternative that would result in the fewest or least significant environmental impacts. State CEQA Guidelines §15126.6(e)(-) - "No Project" Alternative, specifies that "If the environmentally superior alternative is the "no project" alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives." Two "No Project" Alternatives are analyzed above: the circumstance under which the Project does not proceed and the Project site remains in its existing state; and the circumstance under which the Project does not proceed, but the Project site is developed, based on current plans (i.e., Artesia Boulevard Corridor Specific Plan [ABCSP], Artesia General Plan, and Artesia Municipal Code Zoning Ordinance [AMC] and consistent with available infrastructure and community services (what would reasonably be expected to occur in the foreseeable future, if the Project were not approved).

As indicated in **Table 2-15**, the environmentally superior alternative is the No Project/No Construction Alternative because it would result in no impacts for all resource areas analyzed. Similarly, the No Project/Existing Land Use Designation Alternative would be environmentally

superior to the Project because although a relative increase in air quality and GHG emissions would occur, all significance thresholds would remain the same or would be reduced from a less than significant impact with mitigation to a less than significant impact with no mitigation required. Specifically, the No Project/Existing Land Use Designation Alternative would eliminate the Project's mitigation concerning noise and public services and recreation and reduce impacts to a less than significant level. Since the above-mentioned environmentally superior alternatives are the two "no project" alternatives, State CEQA Guidelines requires the EIR to identify an environmentally superior alternative among the other alternatives.

Although the All-Commercial Alternative would eliminate the Project's mitigation concerning noise and public services and recreation and reduce impacts to a less than significant level, it would introduce two potentially significant and unavoidable impacts concerning GHG emissions and transportation (VMT). Therefore, the All-Commercial Alternative is not environmentally superior to the Project.

Therefore, the Reduced Density Alternative is the Environmentally Superior Alternative. As shown in **Table 2-15**, although the Reduced Density Alternative would result in the same levels of significance per the State CEQA Guidelines Appendix G thresholds, this Alternative would result in lesser impacts than the Project concerning the following resource areas: air quality, energy, GHG emissions, land use and planning, population and housing, public services and recreation, and utilities and service systems.



Table 2-15: Comparisons of Alternatives					
Sections	Proposed Project	No Project/No Construction	No Project/Existing Land Use Designation	All-Commercial Alternative	Reduced Density Alternative
Air Quality	LS/M	NI ▼	LS/M ▲	LS/M ▲	LS/M ▼
Cultural Resources	LS/M	NI ▼	LS/M =	LS/M =	LS/M =
Energy	LS	NI ▼	LS =	LS ▲	LS ▼
Geology and Soils	LS/M	NI ▼	LS/M =	LS/M =	LS/M =
Greenhouse Gas Emissions	LS	NI ▼	LS ▲	LS/M or SU ▲	LS ▼
Land Use and Planning	LS	NI ▼	NI ▼	NI ▼	LS ▼
Noise	LS/M	NI ▼	LS ▼	LS ▼	LS/M =
Population and Housing	LS	NI ▼	LS =	LS =	LS ▼
Public Services and Recreation	LS/M	NI ▼	LS ▼	LS ▼	LS/M ▼
Transportation	LS	NI ▼	LS ▼	LS/M or SU ▲	LS ▲
Tribal Cultural Resources	LS/M	NI ▼	LS/M =	LS/M =	LS/M =
Utilities and Service Systems	LS/M	NI ▼	LS/M =	LS/M =	LS/M ▼
NI = No Impact LS = Less than Significant LS/M = Less than Significant with Mitigation SU = Significant and Unavoidable ▲ Indicates the Alternative would result in relatively greater impacts than the Project. (environmentally inferior). ▼ Indicates the Alternative would result in relatively less of an impact than the Project or no impact. (environmentally superior). = Indicates the Alternative would result in the same/similar impacts as the Project. (neither environmentally superior nor inferior).					

**Table 2-16: Comparison of Alternatives' Ability to Meet Project Objectives**, summarizes the comparative analyses of Project objectives presented above (i.e., the alternative's ability to meet the Project objectives). As indicated in **Table 2-16**, out of all the alternatives, the Reduced Density Alternative would fulfill the most of the Project's objectives. It should be noted that although the Reduced Density Alternative fulfills the most Project objectives compared to the other alternatives, this Alternative does not meet two of the Project objectives and only partially meets the other two.

Table 2-16: Alternatives' Ability to Meet Project Objectives				
Would the Alternative:	No Project /No Construction	No Project /Existing Land Use Designation	All-Commercial	Reduced Density Alternative
Redevelop a large underutilized industrial site within the Artesia Boulevard Corridor Specific Plan into a new high quality walkable mixed-use community with various compatible uses including residential, neighborhood-serving ground-floor commercial (restaurant and retail), live/work units with office uses, and onsite amenities.	No	No	Partially	Partially
Create a mixed-use development that encourages walkability and convenience by providing onsite residential uses, neighborhood-serving restaurant and retail uses, and office/commercial uses.	No	No	Partially	No
Address the City's RHNA housing goals by building new residential dwelling units on the site in a manner that minimizes the potential for displacement of existing uses.	No	No	No	Yes
Physically and functionally integrate the proposed development with the surrounding Artesia Boulevard Corridor Specific Plan community by extending the neighborhood urban pattern and surrounding street grid into the site through a series of pedestrian open spaces, including a north-to-south, full site depth, pedestrian access way.	No	Partially	Yes	Partially
Create complementary designs and uses that are compatible with the surrounding neighborhoods by continuing active ground floor retail/restaurant uses along Artesia Boulevard site frontage, adding to the area's mix of uses and businesses.	No	No	Yes	No
Provide a high-quality, varied, and modern architectural and landscape design that is compatible with its diverse surrounding context, and utilizes the site's unique characteristics.	No	Partially	Yes	Yes
Provide viable public and private open space for project residents and surrounding community members by creating a green, welcoming, walkable environment that will encourage use of the outdoors and community interaction.	No	No	Partially	Yes
Include sufficient off-street parking for the proposed residential, commercial, and office uses.	No	Yes	Yes	Yes
Provide an infill development that promotes sustainability by providing electric (non-gas) appliances and connections for the residential component.	No	No	No	Yes

3.0

# List of Preparers



Prepared by

**Kimley»Horn**  
Expect More. Experience Better.



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## 3.0 List of Preparers

### 3.1 LEAD AGENCY

#### **CITY OF ARTESIA**

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- Peter Kann, *Planning Manager*
- Mel Lee, AICP, *Senior Contract Planner (Sagecrest Planning & Environmental)*
- Art Bashmakian, AICP, *Senior Project Manager (Sagecrest Planning & Environmental)*

### 3.2 APPLICANT

#### **G3 URBAN**

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- Mitchell Gardner, *President of Development*
- Jordan Gardner, *President of Homebuilding*

### 3.3 LEAD CONSULTANT

#### **KIMLEY-HORN AND ASSOCIATES, INC.**

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- Rita Garcia, *Project Manager*
- Jessie Fan, *Deputy Project Manager*
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