
7 Alternatives

7.1 Scope and Purpose

Section 15126.6 of the California Environmental Quality Act (CEQA) Guidelines states that the environmental impact report (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 comparative merits of the alternatives evaluated, including the No Project Alternative, shall also be discussed.

The range of alternatives evaluated in an EIR is governed by the “rule of reason,” which requires the EIR set forth alternatives adequate to permit a reasoned choice by decision makers and limited to alternatives that “would avoid or substantially lessen any of the significant effects of the project.” An EIR need not consider an alternative whose effects cannot be reasonably ascertained and whose implementation is remote and speculative (14 CCR 15126.6[a]).

Other than the No Project Alternative, the EIR needs to examine only those alternatives that could feasibly obtain most of the basic objectives of the proposed project even if the alternative would impede to some degree the attainment of project objectives.

Factors that may influence feasibility of an alternative also include “site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries...and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent)” (14 CCR 15126.6[f][1]). The ultimate determination as to whether an alternative is feasible or infeasible is made by the lead agency’s decision-making body, the Oceanside City Council (see California Public Resources Code, Section 21081[a][3]).

This section presents several alternatives to the proposed project, which were considered pursuant to CEQA and evaluated for their ability to meet the basic objectives of the project, while reducing or avoiding the environmental impacts of the project identified in Chapter 4, Environmental Analysis, of the EIR. Those alternatives include No Project Alternative (Section 7.4.1) and Reduced Footprint Alternative (Section 7.4.2). Other alternatives were considered but rejected, as summarized in Section 7.3.

7.2 Criteria for Selection and Analysis of Alternatives

The Pacifica Project (project or proposed project) would not result in any significant and unavoidable impacts. The proposed project would result in potentially significant impacts that would be reduced to a level below significant with implementation of mitigation, related to the following: air quality, biological resources, cultural resources, geology and soils, transportation, and tribal cultural resources (TCRs). The proposed project would result in no impact or less-than-significant impacts to the following: aesthetics, energy, greenhouse gases (GHGs), hazards and hazardous materials, hydrology and water quality, land use and planning, noise, population and housing, public services, recreation, utilities and service systems, and wildfire.

For each of the alternatives identified, this EIR conducts the following assessment:

- Describe the alternative
- Determine if the alternative would meet most of the basic project objectives

- Assess potential feasibility of the alternative
- Determine if the alternative would potentially eliminate or reduce a potentially significant impact of the project

If the alternative meets the above criteria and provides a meaningful CEQA analysis, then the EIR analysis will address the potential impacts of the alternative relative to those potentially significant impacts of the project. An environmentally superior alternative will then be identified based on the alternative's ability to reduce environmental impacts.

Based on the identified potentially significant environmental impacts above, the objectives established for the project (refer to Section 7.2.1, Project Objectives, below), consideration of local plans and zoning designations, and consideration of public input, this EIR evaluates two alternatives to the proposed project:

1. No Project Alternative
2. Reduced Footprint Alternative

7.2.1 Project Objectives

The following objectives of the proposed project are described as follows:

1. Support the housing needs of the City of Oceanside (City) by developing high-quality, workforce housing that balances density with price points and long-term maintenance costs, such that new homes remain financially attainable to entry-level home buyers
2. Maximize residential densities, to the extent feasible, within proximity to transit, education facilities, commercial uses, and trails to reduce reliance on automobiles and potentially minimize GHG emissions
3. Show sensitivity to adjacent properties, open space, and community amenity areas with appropriate setbacks and orientation of buildings and facades
4. Design the community using compatible architectural styles to the existing neighborhood with a scale and treatment that improve the visual image of the surrounding area
5. Create a highly connected and efficient system of sidewalks and pathways layered with a vehicular circulation system that adequately accommodates traffic and connects to the existing neighborhood
6. Provide well-designed common open space areas that are connected throughout the project site while utilizing current water and energy conservation practices
7. Preserve natural land resources by redeveloping underutilized parcels and promoting infill development to reduce urban sprawl

7.2.2 Feasibility

CEQA Guidelines Section 15126.6(f)(1) identifies the factors to be taken into account to determine the feasibility of alternatives. The factors include site suitability; economic viability; availability of infrastructure; general plan consistency; other plans or regulatory limitations; jurisdictional boundaries; and whether the applicant can reasonably acquire, control, or otherwise have access to the alternative site. Not one of these factors establishes a fixed limit on the scope of reasonable alternatives. An alternative does not need to be considered if its environmental effects cannot be reasonably ascertained and if implementation of such an alternative is remote or speculative.

It has been recognized that, for purposes of CEQA, “feasibility” encompasses “desirability” to the extent that the latter is based on a reasonable balancing of the relevant economic, environmental, social, and technological factors (*California Native Plant Society v. City of Santa Cruz* [2009] 177 Cal.App.4th 957, 1001). This balancing is harmonized with CEQA’s fundamental recognition that policy considerations may render alternatives impractical or undesirable (California Public Resources Code, Section 21081; 14 CCR 15126.6[c], 15364).

7.2.3 Evaluation of Significant Impacts

According to CEQA Guidelines Section 15126.6(b), the alternatives discussion should focus on those alternatives that, if implemented, could eliminate or reduce any of the significant environmental impacts of the proposed project. The significant effects of the project impacts are considered to be those that are identified to be potentially significant prior to the incorporation or implementation of any mitigation measures.

7.2.4 Rationale for the Selection of Alternatives

As part of an alternatives analysis, CEQA requires an EIR to address a No Project Alternative. The purpose of describing and analyzing a No Project Alternative is to allow decision makers to compare the impacts of approving a proposed project with the impacts of not approving the proposed project.

EIRs should also identify any alternatives that were considered by the Lead Agency but rejected and briefly explain the reasons why the Lead Agency made such a determination. Among the factors that may be used in an EIR to eliminate alternatives from detailed consideration are (1) failure to meet most of the basic project objectives, (2) infeasibility, and/or (3) inability to avoid significant environmental impacts.

In accordance with these requirements and based on comments received during the CEQA Notice of Preparation and scoping process for the proposed project, alternatives to the proposed project were considered and analyzed compared to the proposed project.

7.3 Alternatives Considered but Rejected

This EIR considered two additional alternatives that are not carried forward for detailed analysis. These alternatives are described below.

7.3.1 Alternate Location

In accordance with CEQA Guidelines Section 15126.6(f)(2), an EIR may consider an alternative location for the proposed project but is only required to do so if significant project effects would be avoided or substantially lessened by moving the project to another site. As the project impacts are all site specific, an alternative location was considered. The intent would be to locate an alternative site within an urban area of the City that would avoid or substantially lessen one or more of the following impacts: air quality, biological resources, cultural resources, geology and soils, transportation, and TCRs. This alternative is assumed to include the same components as the project and would require a site similar to the project’s 14.55-acre site.

There may be sites within the City of an approximately equivalent size to the project site that could be redeveloped with a multifamily development project; however, the project applicant does not own another site within the City of comparable land area that is available for development of the project. One of the factors for feasibility of an

alternative is “whether the proponent can reasonably acquire, control or otherwise have access to the alternative site.” It is unlikely and speculative to assume the feasibility of assembling another site similar to the proposed project that meets most of the project objectives and avoids or substantially lessens the project’s potential significant impacts. The Alternate Location Alternative was considered but rejected due to infeasibility.

7.3.2 Acquisition and Conservation

Under the Acquisition and Conservation Alternative, the project site would be purchased by the City or conservation group and preserved as open space. If this alternative were to become a reality, a potential purchaser would need to acquire the site, prepare a plan for establishing quality habitat, and have funding for long-term maintenance and monitoring. Open space on the project site would reduce all impacts when compared to the proposed project. This alternative would reduce impacts to air quality, biological resources, cultural resources, geology and soils, transportation, and TCRs.

It should be noted that the City does not have any intention of purchasing the project site, and there are no available funding sources to do so. Similarly, no conservation groups have expressed interest in purchasing the site and restoring it into open space. The site does not contain high-quality biological habitat, and no special-status species occur on the site. As discussed in Section 4.3, Biological Resources, of this EIR, there are no potentially significant impacts to special-status species, and the only mitigation required is in regard to the protection of nesting birds.

Due to the fact that there has been no interest by the City, or any conservation group, to purchase the site and restore it to open space, the feasibility of this alternative is unreasonable. The site is surrounded by single-family residential, with the exception of open space to the southwest associated with Libby Lake Park, and there is no quality habitat to restore or protect on site. For these reasons, this alternative was considered but rejected.

7.3.3 Existing General Plan and Zoning

Under the Existing General Plan and Zoning Alternative, the project site would remain designated as Civic Institutional (CI) and zoned Public/Semipublic (PS). Based on the City’s development code, the CI and PS designations would allow for greater development intensity compared to the proposed project. Allowed land uses under this alternative could be a hospital (100 beds and 125 employees), a government office (250 employees), or a high school (1,000 students and 91 employees).

A hospital or a high school would result in an increase in vehicle trips, vehicle miles traveled (VMT), noise, and air pollutant and GHG emissions. Hospital uses have additional noise sources associated with sirens and increased air pollutant emissions associated with generators and backup generators. A hospital would also result in a higher water demand, increase in wastewater generated, and additional demand on energy and natural gas services. A high school would result in substantially more vehicle trips during the beginning and ending of school hours. Noise associated with a high school would also be increased due to bells, intercoms, and outdoor activities. A government office with 250 employees may not necessarily result in increased impacts, but impacts would not be reduced compared to the proposed project. An office use would have different operational noise impacts compared to a residential development, and there is often a noise conflict found at the interface between commercial developments and residential uses. There would also be more parking spaces required, which could increase the amount of needed nighttime safety lighting throughout the property.

The proposed project would overall be a less intensive use than development currently allowed under the existing CI and PS designations. For these reasons, this alternative was considered, but rejected from further analysis.

7.4 Alternatives under Consideration

7.4.1 No Project Alternative

7.4.1.1 Alternative Description

Under the No Project Alternative, the proposed project and associated improvements would not be implemented, and the project site would remain undeveloped. The City's Zoning Ordinance designates the project site PS – Public/Semipublic. Article 16 of the Zoning Ordinance states that the PS zone is intended to “allow consideration of a large public or semipublic use separately from regulations for an underlying base zoning that may or may not be appropriate in combination with the public or semipublic use.” Although nothing would be developed under this alternative, it does not preclude future development on site, as uses allowed under the PS zone would still be allowed under the current land use designation for the site. For purposes of this analysis, no development would occur under this alternative.

7.4.1.2 Comparison of Significant Effects

Air Quality

As described in Section 4.2, Air Quality, based on results from the health risk assessment (HRA), the maximally exposed individual resident off site would be located at the single-family residences to the northeast of the project site. The results of the HRA demonstrate that the toxic air contaminant (TAC) exposure from construction diesel exhaust emissions would result in cancer risk above the 10 in 1 million threshold and a Chronic Hazard Index less than 1 for off-site receptors. TAC emissions from construction of the project would be potentially significant, and mitigation is required.

Under the No Project Alternative, air pollutant emissions associated with construction, including emissions associated with grading, site preparation, site finishing, and building finishing, would not occur. This alternative would therefore avoid significant but mitigable emissions related to TAC exposure from construction diesel exhaust emissions, because no construction air pollutant emissions would occur. Implementation of this alternative would not introduce any uses that would generate operational air pollutant emissions. Thus, compared to the proposed project, the No Project Alternative would reduce air quality impacts because no impacts to air quality would occur.

Biological Resources

As described in Section 4.3, Biological Resources, the California Fish and Game Code protects bird nests, and the Migratory Bird Treaty Act (MBTA) prohibits the intentional take of any migratory bird or any part, nest, or eggs of any such bird. If clearing, grubbing, or other activities that result in the removal of vegetation occur during the nesting bird season, any impacts to active nests or the young of nesting bird species would be a potentially significant impact. Mitigation Measure (MM) BIO-1 would be required to reduce impacts associated with the proposed project.

The No Project Alternative would not require any ground-disturbing activities. As such, this alternative would not result in potential direct and/or indirect impacts to nesting birds. This alternative would not require implementation

of MM-BIO-1, as proposed for the project. Therefore, as no development would occur under this alternative, compared to the proposed project, this alternative would result in reduced impacts to biological resources.

Cultural Resources

As described in Section 4.4, Cultural Resources, despite no significant archaeological resources being identified within the project site, or any indication that human remains may be present, in the event that archaeological resources (sites, features, or artifacts) or human remains are exposed during construction activities, impacts could be potentially significant, and mitigation measures (MM-CUL-1 and MM-CUL-2) would be required.

The No Project Alternative would not require any ground-disturbing activities. As such, this alternative would not result in potential direct and/or indirect significant impacts to cultural resources. This alternative would not require implementation of MM-CUL-1 and MM-CUL-2, as proposed for the project. Therefore, as no development would occur under this alternative, compared to the proposed project, this alternative would result in reduced impacts to cultural resources.

Geology and Soils

As described in Section 4.6, Geology and Soils, development of the proposed project would require excavations for building foundations and utilities, and any excavations into the potentially fossil-bearing strata within the Santiago Formation and/or Pleistocene age deposits could result in potentially significant impacts to paleontological resources, and mitigation measures (MM-GEO-1 through MM-GE-6) would be required.

Under the No Project Alternative, the project site would remain in its current state. Existing topography and on-site soils would not be disturbed by any development. Although the project site would still be subject to potential seismic hazards such as seismic ground shaking, under this alternative, no structures would be present on site. Paleontological resources would be avoided under this alternative since no excavation or grading would be required. Therefore, when compared to the proposed project, the No Project Alternative would reduce impacts related to geology and soils because no impacts to geology and soils would occur.

Transportation

As described in Section 4.15, Transportation, based on the City's traffic thresholds and methodology, roadway improvements would not be required due to implementation of the proposed project, as the increase in project-related traffic delay would not exceed the allowable threshold. The proposed project is anticipated to generate VMT per resident of 15.19 miles, which does not exceed the significance threshold of 16.07 miles. Impacts related to VMT would be less than significant. ~~Nonetheless, two VMT reduction strategies have been included as mitigation in order to encourage alternative modes of transportation (MM-TRA-1 and MM-TRA-2).~~

The project site is currently vacant and does not generate any vehicle trips. No trips would be generated during construction or operation under the No Project Alternative because nothing would be built. Therefore, when compared to the proposed project, the No Project Alternative would reduce impacts related to traffic and circulation because no VMT impacts would occur.

Tribal Cultural Resources

As described in Section 4.16, Tribal Cultural Resources, there is low sensitivity of identifying intact subsurface cultural resource deposits during project implementation. While considered unlikely based on the South Coastal

Information Center (SCIC) records search and correspondence with the tribes, there remains the potential for the project to encounter previously unknown and unanticipated TCRs during construction of the proposed project. Therefore, as recommended in the Negative Cultural Resources Inventory Report (Appendix E), in the event that archaeological resources (sites, features, or artifacts) are exposed during construction activities for the project, potential impacts could occur, and mitigation would be required.

The No Project Alternative would not require any ground-disturbing activities. As such, this alternative would not result in potential direct and/or indirect significant impacts to cultural resources. This alternative would not require implementation of MM-CUL-1 and MM-CUL-2, or MM-TCR-1 through MM-TCR-8, as proposed for the project. Therefore, as no development would occur under this alternative, compared to the proposed project, this alternative would result in reduced impacts to cultural resources.

7.4.1.3 Relation to Project Objectives

Since the No Project Alternative would not provide any development, overall impacts would be reduced compared to the proposed project. However, certain benefits would not be realized under this alternative, including the provision of housing units within proximity to transit. Furthermore, as the No Project Alternative would not develop the site or allow for housing, this alternative would not fulfill any of the proposed project objectives.

7.4.2 Reduced Footprint Alternative

7.4.2.1 Alternative Description

A site plan has not been generated for the Reduced Footprint Alternative; however, it is assumed that the design would be reconfigured to reduce the overall square footage of the building footprint and increase the height of the buildings. Under the Reduced Footprint Alternative, the project would be developed with the same number of units (164 units), but instead of three-story buildings (38 feet tall), there would be four-story buildings (48 feet tall), thereby reducing the overall footprint of the project. The project site is set down relative to the surrounding single-family homes, and 20- to 30-foot slopes buffer the proposed development footprint from existing residences. However, surrounding land uses may be less amenable to increased building heights in the vicinity of existing single-family homes, and impacts to visual effects and neighborhood character may be increased in comparison to the proposed project.

The Reduced Footprint Alternative would increase the amount of open space and buffer area in relation to surrounding single-family residences and site access would remain the same as the proposed project. Overall, environmental impacts associated with the Reduced Footprint Alternative would remain relatively the same; however, the increase in open space and recreational area would provide additional conveniences to future residences and surrounding land uses.

The same discretionary actions as required for the project would also be required for this alternative, including a General Plan Amendment, Rezone, Tentative Map, and Planned Development Plan.

7.4.2.2 Comparison of Significant Effects

Air Quality

As described in Section 4.2, based on results from the HRA, the maximally exposed individual resident off site would be located at the single-family residences to the northeast of the project site. The results of the HRA demonstrate that the TAC exposure from construction diesel exhaust emissions would result in cancer risk above the 10 in 1 million threshold and a Chronic Hazard Index less than 1 for off-site receptors. TAC emissions from construction of the project would be potentially significant, and mitigation is required.

The Reduced Footprint Alternative would be located within the same site as the proposed project, and the disturbance area would be slightly reduced as a result of the increased building height. Air pollutant emissions associated with construction of the alternative, including emissions associated with grading, site preparation, building, and architectural finishing, would occur, which would be similar in comparison to the proposed project. The mitigation measure (MM-AQ-1) proposed for the project to address potentially significant impacts related to emissions of TACs during construction is still anticipated under this alternative.

Under the Reduced Footprint Alternative, mobile source operational emissions from light vehicle trips would be the same as the proposed project because the same number of units would be constructed and the same number of trips would be generated. Therefore, similar stationary source operational air pollutant emissions would occur compared to the proposed project. As such, this alternative would likely result in similar impacts to air quality compared to the proposed project.

Biological Resources

As described in Section 4.3, the California Fish and Game Code protects bird nests, and the MBTA prohibits the intentional take of any migratory bird or any part, nest, or eggs of any such bird. If clearing, grubbing, or other activities that result in the removal of vegetation occur during the nesting bird season, any impacts to active nests or the young of nesting bird species would be a potentially significant impact. MM-BIO-1 would be required to reduce impacts associated with the proposed project.

The Reduced Footprint Alternative would result in a reduced ground disturbance on the project site. Because reduced ground disturbance would occur under this alternative, there would be less potential to impact existing biological resources on site. However, there are no significant biological resources on site, and impacts to potential nesting birds would still occur. MM-BIO-1 would still be required. With implementation of the mitigation measure, this alternative would result in similar impacts to biological resources compared to the project.

Cultural Resources

As described in Section 4.4, despite no significant archaeological resources being identified within the project site or any indication that human remains may be present, in the event that archaeological resources (sites, features, or artifacts) or human remains are exposed during construction activities, impacts could be potentially significant, and mitigation measures (MM-CUL-1 and MM-CUL-2) would be required.

Implementation of this alternative would occur on the same project site and would have the same potential for discovery of cultural resources during grading and excavation activities. Although the footprint would be slightly reduced, there may be a minimal reduction in potential impacts; however, impacts would be substantially the same

as the proposed project and would be reduced to less than significant upon implementation of mitigation measures MM-CUL-1 and MM-CUL-2. With implementation of mitigation measures, this alternative would result in similar impacts to cultural resources compared to the project.

Geology and Soils

As described in Section 4.6, development of the proposed project would require excavations for building foundations and utilities, and any excavations into the potentially fossil-bearing strata within the Santiago Formation and/or Pleistocene age deposits could result in potentially significant impacts to paleontological resources, and mitigation measures (MM-GEO-1 through MM-GE-6) would be required.

The Reduced Footprint Alternative would be located within the same site as the proposed project; however, the area of excavation would be slightly reduced because of the reduced building footprint. Nonetheless, ground disturbance including grading would still occur under this alternative, and the potential for impacts to paleontological resources would still be considered potentially significant. This alternative is expected to require implementation of mitigation measures similar to MM-GEO-1 through MM-GEO-6 under the proposed project, in order to reduce potentially significant impacts to paleontological resources. Therefore, this alternative would result in similar impacts compared to the proposed project.

Transportation

As described in Section 4.15, based on the City's traffic thresholds and methodology, roadway improvements would not be required due to implementation of the proposed project, as the increase in project-related traffic delay would not exceed the allowable threshold. The proposed project is anticipated to generate VMT per resident of 15.19 miles, which does not exceed the significance threshold of 16.07 miles. VMT impacts are anticipated to be less than significant. ~~Nonetheless, two VMT reduction strategies have been included as mitigation in order to encourage alternative modes of transportation (MM-TRA-1 and MM-TRA-2).~~

The project site is currently vacant and does not generate any vehicle trips. The same number of units as the proposed project would be constructed under the Reduced Footprint Alternative, and the same number of vehicle trips would be generated. Therefore, when compared to the proposed project, the impacts related to traffic and circulation, and specifically VMT, would be the same.

Tribal Cultural Resources

As described in Section 4.16, there is low sensitivity of identifying intact subsurface cultural resource deposits during project implementation. While considered unlikely based on the SCIC records search and correspondence with the tribes, there remains the potential for the project to encounter previously unknown and unanticipated TCRs during construction of the proposed project. Therefore, as recommended in the Negative Cultural Resources Inventory Report (Appendix E), in the event that archaeological resources (sites, features, or artifacts) are exposed during construction activities for the project, potential impacts could occur, and mitigation would be required.

Implementation of this alternative would occur on the same project site and would have the same potential for discovery of TCRs during grading and excavation activities. Although the footprint would be slightly reduced, there may be a minimal reduction in potential impacts; however, impacts would be substantially the same as the proposed project and would be reduced to less than significant upon implementation of mitigation measures MM-

CUL-1 and MM-CUL-2, and MM-TCR-1 through MM-TCR-8. With implementation of mitigation measures, this alternative would result in similar impacts to TCRs compared to the project.

7.4.2.3 Relation to Project Objectives

The Reduced Footprint Alternative would meet all proposed project objectives with the exception of meeting Objective 4 (design the community using compatible architectural styles to the existing neighborhood with a scale and treatment that improve on the visual image of the surrounding area). The development of four-story buildings compared to three-story buildings would increase the severity of aesthetic and visual impacts to the surrounding community. Instead of the buildings being 38 feet in height, they would be 48 feet in height. This increase in height would not create a community with a scale that would improve the visual image of the surrounding area.

Lastly, although the Reduced Footprint Alternative would meet most of the project objectives and potentially reduce the severity of impacts related to air quality, cultural resources, and TCRs in comparison to the proposed project due to the reduced development footprint, such impacts to air quality, biological resources, cultural resources, geology and soils, and TCRs under this alternative would remain as less than significant with mitigation incorporated, similar to the proposed project. Impacts associated with traffic and VMT would remain the same as the proposed project because the same number of units would be constructed.

7.5 Environmentally Superior Alternative

Table 7-1 provides a qualitative comparison of the impacts for each alternative compared to the proposed project. As shown in Table 7-1, the No Project Alternative would eliminate all of the significant impacts identified for the project. However, the No Project Alternative would not meet any of the project objectives. CEQA Guidelines Section 15126.6(e)(2) states that if the No Project Alternative is identified as the environmentally superior alternative, then an environmentally superior alternative should be identified among the other alternatives.

Among the other alternatives, not including the proposed project, the Reduced Footprint Alternative would be considered the environmentally superior alternative because it would potentially provide a reduced level of impact in some environmental analysis areas, albeit minimal, including air quality, cultural resources, and TCRs. However, under this alternative, it is still assumed that impacts would occur and mitigation would be required. Specifically, impacts to air quality, biological resources, cultural resources, geology and soils, transportation, and TCRs would remain less than significant with mitigation incorporated, similar to the proposed project. However, impacts associated with visual effects and neighborhood character would be increased compared to the proposed project.

The Reduced Footprint Alternative would meet all proposed project objectives with the exception of meeting Objective 4.

Nevertheless, because this alternative would slightly reduce potentially significant impacts in comparison to the project, this alternative is considered the environmentally superior alternative.

Table 7-1. Comparative Summary of Alternatives under Consideration and Proposed Project

Environmental Topic	Proposed Project Impact	No Project Alternative Impact	Reduced Footprint Alternative Impact
Air Quality	LTSM	No Impact (Reduced)	LTS (Reduced)
Biological Resources	LTSM	No Impact (Reduced)	LTSM (Same)
Cultural Resources	LTSM	No Impact (Reduced)	LTSM (Same)
Geology and Soils	LTSM	No Impact (Reduced)	LTSM (Same)
Transportation	LTSM	No Impact (Reduced)	LTSM (Same)
Tribal Cultural Resources	LTSM	No Impact (Reduced)	LTSM (Same)

Notes: Impact Status: LTSM = less than significant with mitigation; LTS = less-than-significant.