

Section 7

Alternatives

7.1 CEQA REQUIREMENTS FOR CONSIDERATION OF ALTERNATIVES

CEQA requires that an EIR consider a reasonable range of alternatives to a proposed project that can attain most of the basic project objectives, but has the potential to reduce or eliminate significant adverse impacts of the proposed project and may be feasibly accomplished in a successful manner, considering the economic, environmental, social and technological factors involved. An EIR must evaluate the comparative merits of the alternatives (CEQA Guidelines Sections 15126.6(a), (d) and (e)). If certain alternatives are found to be infeasible, the analysis must explain the reasons and facts supporting that conclusion. Section 15126.6(d) also requires that, if an alternative would cause one or more significant effects in addition to those caused by the proposed project, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed. One of the alternatives analyzed must be the “No Project” alternative (CEQA Guidelines Section 15126.6(e)). The EIR must also identify alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and should briefly explain the reasons underlying the lead agency's determination (CEQA Guidelines Section 15126.6(c)).

7.2 ALTERNATIVES EVALUATED IN EQUAL LEVEL OF DETAIL

Based on the project objectives, LACDPW has developed the following four alternatives of the Sun Valley Watershed Management Plan:

- Alternative 1 – Infiltration
- Alternative 2 – Water Conservation
- Alternative 3 – Stormwater Reuse
- Alternative 4 – Urban Storm Protection

The description of each alternative is presented in **Section 3.5**. The development process of the four alternatives is summarized in **Section 3.5.1**, and discussed in detail in the Sun Valley Watershed Management Plan and Technical Memoranda Nos. 1, 3, 4, and 5 (see **Section 2.9** for availability of related documents). The environmental impact analyses of the four County-defined alternatives as well as the theoretical worst-case alternative are presented in **Sections 4.1 through 4.12**.

7.3 ALTERNATIVES ELIMINATED FROM FURTHER CONSIDERATION

During the alternatives development process (summarized in **Section 3.5.1**), the following project components were initially considered but eliminated from further consideration:

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- Burbank Airport Retention Basin
- Non-Potable Water Distribution System
- San Fernando/Tuxford – Cal Mat Pit Tunnel
- Vineland Avenue Pump Station and Force Main

These project components are summarized below and described in further detail in Technical Memorandum No. 4.

Burbank Airport Retention Basin. The project site consists of a 37-acre parcel located at the west end of Burbank-Glendale-Pasadena Airport. The site is bounded by Vineland Avenue, Tujunga Avenue, the Metrolink railroad, and a commercial compound. The area is mostly undeveloped, but contains runway approach lights and airport communications devices. The project site was considered for installation of underground vaults and infiltration systems to store and infiltrate stormwater. This project component was determined to be infeasible since the site is within the Airport's Runway Protection Zone, and construction in this area could reduce the effectiveness of this zone which serves to mitigate the effects of aircraft overshoot and undershoot of the runway.

Non-Potable Water Distribution System. One of the project components evaluated during the initial stages was an extensive, watershed-wide non-potable water distribution system to reuse some of the collected stormwater. An inventory of potential non-potable water users throughout the watershed was compiled and their average annual demands were estimated. Based on this inventory, it was determined that Vulcan Gravel Processing Plant accounts for more than 80 percent of the potential non-potable water use in the project area. A watershed-wide distribution system was found to be inefficient due to the length of pipeline necessary to deliver water to a large number of small users. Therefore, the more extensive distribution system proposed in the initial stages was replaced by the stormwater reuse line from Strathern Pit to Vulcan Gravel Processing Plant (proposed in Alternative 3).

San Fernando/Tuxford – Cal Mat Pit Tunnel. A tunnel from the intersection of San Fernando Road and Tuxford Street to Cal Mat Pit was proposed. The tunnel would collect runoff reaching the San Fernando-Tuxford intersection and convey it by gravity to Cal Mat Pit for infiltration or reuse. It would consist of 8,800 feet of an 8-foot or 12-foot diameter storm drain to be constructed at an average depth of 55 feet and a maximum depth of 90 feet. While the tunnel would contribute to alleviating flooding at the San Fernando-Tuxford intersection, it was determined to be infeasible due to the technological constraints and costs involved in the construction of the tunnel.

Vineland Avenue Pump Station and Force Main. This project component consisted of a pump station, located at the lower end of the watershed, and a pipeline along Vineland Avenue to collect and convey runoff from the lower watershed to Strathern Pit. The runoff transported to Strathern Pit would be infiltrated or reused. The pump station was proposed to be constructed on the Burbank-Glendale-Pasadena Airport property near the intersection of Vineland Avenue and the Metrolink railroad. The proposed capacity of the pump station ranged between 450 and 900 cfs (14,000 to 26,000 hp). The pipeline dimensions would be 8,300 feet in length and 6 to 7 feet

in diameter. This project component was determined to be infeasible due to the costs involved in the construction of the pump station and force main.

7.4 ALTERNATIVES EVALUATED IN THIS SECTION

This section evaluates the environmental effects of project alternatives that are in addition to the four County-defined alternatives of the Watershed Management Plan.

These additional alternatives include the following:

- No Project Alternative
- 9250 Project Alternative
- Boulevard Pit Alternative (Substitution for Sheldon Pit)

The description and analysis of environmental impacts for each of the above alternatives are presented below.

7.5 PROJECT OBJECTIVES

As presented in **Section 2**, the primary objective of the project is to reduce local flooding in the project area. Secondary objectives of the project are: increase water conservation, increase recreational opportunities, increase wildlife habitat, improve water quality, provide additional environmental benefits, and increase multiple agency participation.

7.6 NO PROJECT ALTERNATIVE

7.6.1 Description

The No Project alternative under CEQA represents what is reasonably expected to occur in the future given well-defined trends and other parameters, such as adopted or on-going plans and programs (e.g., general plans and population projections), in the absence of the proposed project.

Nine of the seventeen proposed project components involve use of publicly owned properties with existing facilities (schools, parks, street rights-of-way, and other city properties). Under the No Project alternative, these sites and facilities are expected to continue current usage and remain essentially the same as under existing conditions. Two project components (Onsite BMPs and Tree Planting & Mulching) are proposed as voluntary community involvement programs at existing residential, commercial, and industrial properties. Under the No project alternative, these properties are expected to continue current usage and remain essentially the same as under existing conditions.

Six project components involve use of privately held properties. **Table 7-1** describes the predicted future use of these sites, based on its current usage and City of Los Angeles zoning and general plan land use designations.

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**Table 7-1
Project Component Sites with Potential Future Changes in Land Use
in the Absence of the Proposed Project**

Project Component Site	Existing Use	Zoning Designation*	General Plan Land Use Designation	Possible Future Use in Absence of Proposed Project Based on Zoning and Land Use Designations
Cal Mat Pit	Idle	A1	Open Space	Inert landfill, then reclaimed as a park once landfill capacity is reached
New Park on Wentworth	Vacant	RA	Very Low Residential	Remains vacant or becomes developed with single-family residential units
Parking Lot on Sherman	Commercial and industrial facilities	M2	Light Manufacturing	Same as existing use
Sheldon Pit	Gravel wash water source and disposal	A1	Open Space	Same as existing use, then reclaimed as a park once local gravel resources are exhausted and Vulcan Gravel Processing Plant ceases its operation
Strathern Pit	Inert landfill	M2, M3, and P	Light and Limited Manufacturing	Same as existing use, then reclaimed as industrial facilities once landfill capacity is reached
Vulcan Gravel Processing Plant	Gravel Processing	M3	Heavy Manufacturing	Same as existing use, then converted to other industrial uses once local gravel resources are exhausted

* Zoning Designations

A1: Agricultural P: Automobile Parking
M2: Light Industrial RA: Suburban
M3: Heavy Industrial

7.6.2 Environmental Impacts

Under the No Project alternative, impacts related to construction of the proposed stormwater management facilities would not occur. Construction-related impacts on air quality, noise, and traffic could result from implementation of other projects on these sites but the level of these impacts is unknown. Depending on the extent of new development on these sites, if any, the significant construction-related impacts on air quality associated with the Watershed Management Plan could be avoided.

Under the No Project alternative, the Sun Valley area would continue to lack stormwater management facilities. Local flooding currently experienced within the watershed would not be remedied. Similarly, other benefits of the Watershed Management Plan (i.e., water conservation (from stormwater reuse/infiltration), improved surface water quality (from stormwater treatment), creation of wildlife habitat (from wetlands creation), air quality improvement (from tree planting), and energy conservation (from tree planting and mulching) would not result. Without the Watershed Management Plan, new recreational facilities might eventually be constructed at Cal Mat Pit and Sheldon Pit. However, the total increase in recreational resources would be larger under the Watershed Management Plan and would be implemented sooner.

Since the No Project alternative does not have the beneficial effects of the Watershed Management Plan or meet project objectives, it is rejected as environmentally inferior the proposed project.

7.7 PROJECT 9250 ALTERNATIVE

7.7.1 Description

In 1970, LACDPW proposed Project 9250, which consisted of a system of storm drains throughout the Sun Valley Watershed. A Draft EIR was prepared in 1995 (LACDPW, 1995) for the project. However, the project was never implemented primarily due to lack of funding and community support.

Project 9250 proposed approximately 10 miles of storm drains, including 7 miles of trunk drain and 3 miles of laterals. The alignment and lengths of the storm drains proposed under Project 9250 are similar to those proposed under the Watershed Management Plan. However, the dimensions of the pipes of the storm drains (width and depth) required by the proposed project would generally be smaller than that of Project 9250.

7.7.2 Environmental Impacts

The Draft EIR prepared for Project 9250 concluded that the proposal would have significant short-term environmental effects related to traffic and circulation, air quality, and emergency access (LACDPW, 1995). Therefore, the significant construction-related impacts on air quality associated with the Watershed Management Plan could not be avoided with implementation of the Project 9250 alternative.

Since Project 9250 would be constructed within existing streets, significant impacts on cultural and/or biological resources would not occur. Therefore, implementation of this alternative would avoid the impacts on these resources identified for the Watershed Management Plan (potential but unknown buried archaeological resources, potential historic machinery, refuse, or structures at Strathern Pit, Cal Mat Pit, and Sheldon Pit; potential but unknown sensitive biological resources at Cal Mat Pit, Sheldon Pit, Strathern Pit, Vulcan Gravel Processing Plant, and New Park on Wentworth). However, mitigation has been identified to reduce these impacts (Sections 4.2.7 and 4.3.4).

While the local flood control benefits achieved by Project 9250 would be similar to the proposed project, the majority of the other beneficial impacts related to the Watershed Management Plan would not occur. Construction of storm drains alone would not increase water conservation, improve surface water quality, add recreational facilities, improve wildlife habitat, conserve energy, or improve air quality. However, Project 9250 would increase flows carried by the Los Angeles River and thereby intensify flooding risk to downstream communities along the Los Angeles River corridor. It would also convey stormwater runoff directly to the River and eventually the Pacific Ocean without any treatment for water quality improvement. Since all stormwater from the project area does not currently reach the River or Ocean, implementation of Project 9250 would, to some degree, increase the overall pollutant load to these waterbodies.

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Since the Project 9250 alternative does not avoid the significant air quality construction impact of the proposed project and since it does not meet all project objectives or provide as many environmental benefits as the Watershed Management Plan, it is rejected as environmentally inferior to the proposed project.

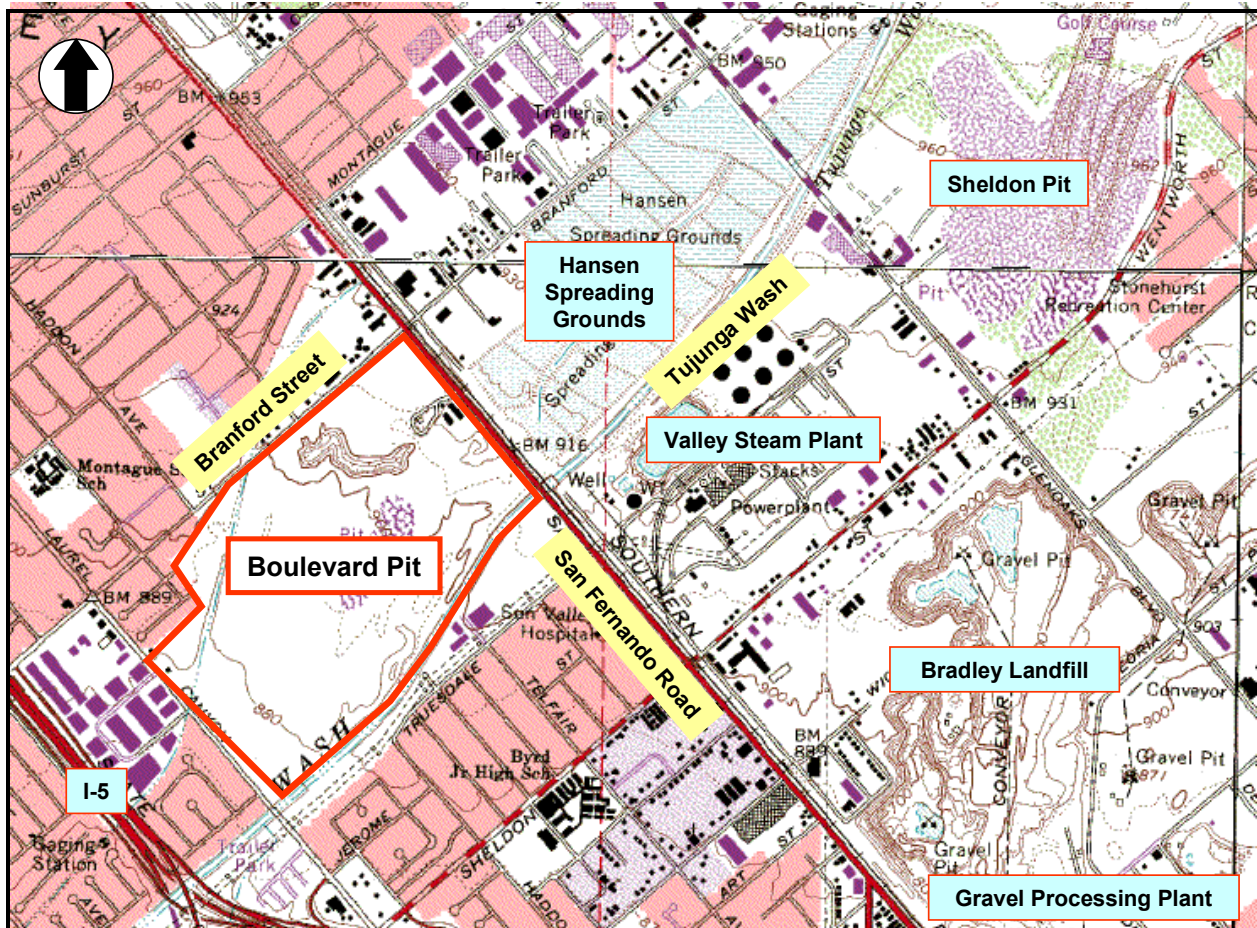
7.8 BOULEVARD PIT ALTERNATIVE

7.8.1 Description

This alternative involves substituting Boulevard Pit for one of the proposed project components – Sheldon Pit and Tujunga Wash Transfer – which is included in Alternative 2. Boulevard Pit is an actively mined gravel pit located just outside of Sun Valley Watershed, on the southern corner of San Fernando Road and Branford Street (see **Figure 7-1**). The pit is owned and operated by Vulcan Materials Company. The gravel extracted from Boulevard Pit is transported by a conveyer belt to the Vulcan Gravel Processing Plant for processing.

Boulevard Pit has been considered as an alternative to Sheldon Pit for capturing and infiltrating some of the storm flows from Tujunga Wash. Both facilities are located adjacent to Tujunga Wash. The two gravel pits are also comparable in size and therefore stormwater storage capacity.

**Figure 7-1
Boulevard Pit and Vicinity**



7.8.2 Environmental Impacts

Under the Boulevard Pit alternative, construction-related impacts (less than significant noise and traffic and significant air quality) would be expected to be similar to the impacts described for Sheldon Pit. Since permission to access the site was not received from the property owners, on-foot survey of Boulevard Pit for biological and cultural resources was not conducted. Therefore, this alternative would also require mitigation to reduce potential cultural resources impacts to a less than significant impact. As with the other gravel pit sites proposed under the Watershed Management Plan, impacts to sensitive biological resources are unknown but potentially significant even with implementation of feasible mitigation measures.

Gravel pits included in the Watershed Management Plan (Cal Mat Pit, Sheldon Pit, and Strathern Pit) are exhausted gravel pits where gravel extraction operations have ceased. However, under this alternative, conversion of the actively mined Boulevard Pit into a stormwater retention basin would interrupt the ongoing gravel extraction activities. This would be considered an adverse impact on the local availability of mineral resources.

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Since Boulevard Pit is located outside of the watershed, it cannot be used to capture stormwater generated within Sun Valley Watershed via gravity. Therefore, unlike Sheldon Pit, it would not provide any local flood control benefits for the watershed. Assuming that Boulevard Pit would be designed similar to the Sheldon Pit component, other environmental benefits that are expected from the Sheldon Pit component would be similar. These benefits include water conservation from infiltration of Tujunga Wash flows, increase in recreational resources and wildlife habitat, and air quality improvements.

Since the Boulevard Pit alternative would not provide any local flood control benefits for the watershed and since it would have an adverse impact on the local availability of mineral resources, it is rejected as environmentally inferior to the proposed project.

7.9 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Significant impacts identified for the Watershed Management Plan include air pollutant emissions associated with construction of some project components. Of the County-identified alternatives (1 through 4), Alternative 2 has the worst construction-related air emissions (since the Sheldon Pit and Tujunga Wash Transfer component is included) and Alternative 1 is predicted to have the lowest levels of air pollutant emissions. This air quality impact would be avoided under No Project, but the No Project alternative is rejected as environmentally inferior since it would not address the existing flooding conditions in the watershed. Significant construction-related air emissions were also identified for the 9250 Project. Although the impact is significant under any of the County-defined Watershed Management Plan alternatives (or with the Boulevard Pit alternative), mitigation measures have been identified to reduce the impact to the extent feasible. As compared with the No Project, 9250 Project, and Boulevard Pit alternatives, the proposed Watershed Management Plan is considered the environmentally superior project. Comparison of the four County-defined alternatives is based on the environmental benefits of the project alternative as compared with project objectives (**Table 7-2**).

**Table 7-2
Comparison of the Benefits of Project Alternatives**

Project Objective	Alternatives Analysis
Reduce local flooding	Variable by component location but overall Alternatives 1, 2 and 3 are similar – Alternative 4 provides the least local flooding reduction.
Increase water conservation	Alternative 2 provides the greatest beneficial groundwater volume impact; Alternative 3 includes the largest amount of reuse (primarily washwater).
Increase recreational opportunities	Alternative 2 includes the greatest acreage (84) of new park facilities.
Increase wildlife habitat	Alternative 2 includes creation of wetlands at Sheldon Pit and Strathern Pit (with native vegetation restoration potential).
Improve water quality	Alternatives 1, 2, and 3 divert similar amounts of flow (and more than Alternative 4) from the Los Angeles River and provide stormwater runoff treatment.
Provide additional environmental benefits (air quality improvement and energy reduction)	Alternatives 1 and 3 include higher levels of participation in Tree Planting and Mulching (as compared with Alternatives 2 and 4).
Increase multiple agency participation	Provided under all alternatives.

Alternatives 1, 2 and 3 are similar in regard to the main project objective of reducing local flooding. However, based on the inclusion (and size) of project components with wetlands, parks, and groundwater infiltration, Alternative 2 is identified as the environmentally superior Watershed Management Plan alternative.

Since the Watershed Management Plan will be implemented over 10 years, a definitive listing of project components to be contained in the final Plan is not possible. This Program EIR considers the environmental impacts of each of the project components individually as well as the impacts of the four sample alternatives. The County intends to adopt all components of the Watershed Management Plan.