

5.1 Introduction

State CEQA Guidelines Section 15126.6 requires that an EIR describe a range of reasonable alternatives to a project or to the location of a project that could feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any significant environmental impacts. According to the State CEQA Guidelines, the EIR should compare merits of the alternatives and determine an environmentally superior alternative. The range of alternatives discussed in an EIR is governed by the “rule of reason,” which requires the identification of only those alternatives necessary to permit a reasoned choice between the alternatives and the proposed project. An EIR need not consider an alternative that would be infeasible. State CEQA Guidelines Section 15126.6(f)(1) explains that the evaluation of project alternative feasibility can consider “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.” The EIR is also not required to evaluate an alternative that: (1) has an effect that cannot be reasonably identified or that has remote or speculative implementation and (2) would not achieve the basic project objectives.

As set forth previously in Chapter 2, *Project Description*, the City of Los Angeles (City) has the following underlying purpose for the Sidewalk Repair Program (Project): to ensure compliance with the *Willits* Settlement and streamline review of sidewalk repair projects consistent with applicable accessibility standards. The following is a list of the Project objectives, including the fundamental Project objective, which is to:

- Ensure the continued and efficient compliance with the requirements of the *Willits* Settlement while amending the existing program for sidewalk and curb ramp improvements within the City, in accordance with the applicable accessibility requirements, including those required by the Americans with Disabilities Act.

The following additional project objectives have also been identified:

1. Retain existing street trees that are the cause of sidewalk barriers to the extent feasible, and provided the sidewalk improvements would not result in street tree mortality or compromise public safety.
2. If the removal of one or more street trees is required, ensure compliance with the City’s replacement requirements adopted to ensure no net street tree canopy loss at the end of the Project implementation period.
3. Identify the criteria and process for ministerial approval of future sidewalk improvements and street tree removals and replacements, with the goal of avoiding the need to undertake individualized environmental review of every repair of every City sidewalk or of every street tree removal and replacement and the potential legal challenge to each such approval, thereby streamlining the *Willits* Settlement implementation and providing certainty to the City and the disability community.

5.2 CEQA Alternatives Considered

State CEQA Guidelines Section 15126.6(f) notes that the range of alternatives required in an EIR is governed by a rule of reason and must include only those alternatives that are necessary to permit a reasoned choice. The alternatives should avoid or substantially lessen the Project's significant effects. Furthermore, only the alternatives that the lead agency determines could feasibly attain most of the basic objectives of the Project should be analyzed in detail. Scoping comments received for this EIR also informed the identification and development of alternatives to the proposed Project. Based on these considerations, the following alternatives to the proposed Project have been identified by the City for consideration in this EIR.

5.2.1 No Project Alternative

State CEQA Guidelines Section 15126.6(e) requires that, among the project alternatives, an EIR include a "no project" alternative. State CEQA Guidelines Section 15126.6(e)(2) requires that the no project alternative analysis "discuss the existing conditions...as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and policies and consistent with the available infrastructure and community services."

Under the No Project Alternative, implementation of sidewalk repairs throughout the City would continue to be undertaken pursuant to the City's obligations under the *Willits* Settlement Agreement using existing ordinances and policies. In accordance with existing processes, a case-by-case review and approval of each sidewalk repair project funded as a result of the Settlement would occur. The City will continue to expend funds on sidewalk repairs during the Settlement's 30-year compliance period, for a total of \$1.3 billion, and sidewalk repairs and street tree removals and replacements would continue per established practices at the time the Notice of Preparation and Initial Study were published in July 2017. The City's existing sidewalk improvement process involving repair and maintenance activities, as described in Section 2.1.2.2, would continue to occur to ensure continued compliance with applicable disability and accessibility laws, consistent with the terms of the Settlement. Sidewalk repairs and maintenance will be carried out in accordance with existing policies and procedures as described in Section 2.1.2.3, including the "fix and release" program established under Ordinance No. 184596 and pursuant to Sidewalks Standard Plan S-440-0. The Prioritization System, adopted by the City Council in January 2018, will be used to prioritize repair work under the No Project Alternative. As under existing conditions, constituents may submit requests for sidewalk repairs under the Access Request, Rebate, and Report a Sidewalk Problem.

Under the No Project Alternative, individual sidewalk repair projects will continue to be reviewed on a case-by-case basis for compliance with CEQA. A streamlined review process, including use of ministerial approvals for sidewalk improvements, will not be established. It is anticipated that a majority of the sidewalk repair projects will meet the definition of a Class 1 existing facility repair and maintenance project for purposes of the categorical exemption identified in State CEQA Guidelines Section 15301(c). Whether a particular sidewalk repair is exempt from CEQA would be determined at the time the repair project is proposed.

Removal and replacement of street trees under the No Project Alternative will continue to occur in accordance with the Street Tree Removal Permit and Tree Replacement Condition Policies adopted by the Board of Public Works (BPW) in June 2015, which requires a 2:1 replacement ratio; these policies will not be revised under the No Project Alternative. Accordingly, the Bureau of Street

Services (BSS) will continue with the current practice of reviewing the street tree removal permit applications for removal of up to two trees, followed by reviews and a decision being made on approval or denial of the permit application by a BPW commissioner. For removal of three or more street trees for a sidewalk repair project, a minimum 30-day notification period will continue to be required, after which BSS will review the street tree removal permit application and make a recommendation to BPW for approval or denial of the permit. After the preparation of a BPW board report for this project, a BPW public hearing will be conducted to consider the application and approve/deny the permit for removal of three or more trees. Existing street tree retention methods will continue, including implementation of City root-pruning standards that are applicable to tree species being considered for root pruning. Under the No Project Alternative, a revised Street Tree Retention, Removal, and Replacement Policy will not be established; as described above, street tree removal permit applications will continue to require discretionary approvals (from BSS for up to two trees and from BPW for three or more trees) subject to existing street tree replacement requirements (2:1 ratio).

5.2.2 Alternative 1. Ordinance to repair sidewalks and avoid removal of any street trees.

During the EIR scoping process, commenters suggested that the sidewalk repairs should avoid all street tree removals. Accordingly, an alternative was considered under which the proposed ordinance would prohibit the removal of any street trees to repair sidewalks. Under this alternative, the new proposed ordinance would allow for ministerial approval of sidewalk repairs only when root pruning is a viable option for correcting tree-related damage to sidewalks. This alternative would therefore prohibit the removal of any street trees as part of the Project, including as part of a discretionary approval process. The City would, however, under circumstances where a dead or dying tree poses a safety hazard or hazard to private property, as determined by a City arborist, continue removing and replanting trees to avoid such a hazard. Removing damaged, diseased, or dead trees is part of routine City activities that would continue.

Under this alternative, nevertheless, Settlement funding would be used to repair only those sidewalks that do not involve street tree removals. Any construction scenarios described in the Project description that involve street tree removal would not occur, including but not limited to street tree replacement and associated construction activities. Other activities related to the construction scenarios are expected to be the same (see Section 2.5.3.4). Based on the sidewalk repair activities that have occurred across the City to date, and the representative site plans for sidewalk repair and curb ramp installation work for compliance with accessibility standards (see Section 2.4.3.1), showing street tree removals, the prohibition of street tree removals under this alternative would reduce the square footage of sidewalks that can be repaired across the City compared to the proposed Project. Thus, while a ministerial approval process for sidewalk repair projects that do not require any street tree removals would be established under this alternative, thereby streamlining the process, the total amount of sidewalk repairs that would be completed under Alternative 1 would be less than under the proposed Project. Because there would be no street tree removals under this alternative, no street tree replacements would need to occur; therefore, under Alternative 1, no operations activities described under the proposed Project would occur, such as replacement street tree monitoring and watering. Under this alternative, no changes to the existing 2015 Board of Public Works Policy for the Sidewalk Repair Project would occur.

5.2.3 Alternative 2. Ordinance to exclude sidewalk repairs and street tree removals within 23 feet of the nearest occupied space façade of the closest sensitive receptor (residential or commercial use).

Under Alternative 2, the proposed new ordinance would revise the way sidewalk repair projects are reviewed and approved for only those projects that are more than 23 feet from the nearest occupied façade of the closest sensitive receptor (commercial or residential use); sidewalk repair projects that are within 23 feet of the nearest occupied façade of the closest sensitive receptor (commercial or residential) would continue to be evaluated on a case-by-case basis, as under existing conditions, for purposes of CEQA compliance and approval.

Under Alternative 2, sidewalk repair projects that are more than 23 feet from the nearest occupied façade of the closest sensitive receptor (commercial or residential use) would proceed under ministerial approvals as long as they fall within the specific parameters of the construction scenarios described in Section 2.5.3 and would not cause a substantial adverse change to significance of a known historic, known tribal cultural, known unique archaeological, or known unique paleontological resource, as those terms are defined by CEQA. Sidewalk repair construction sites that are more than 23 feet from the nearest occupied façade of the closest sensitive receptor (commercial or residential) but are outside the specific parameters for a ministerial approval would be subject to a discretionary approval process, relying on this EIR for a streamlined review under CEQA. This alternative avoids noise and vibration impacts on sensitive uses. All sidewalk repair projects under Alternative 2, whether approved ministerially or discretionarily in a streamlined manner, would be carried out in compliance with the *Willits* Settlement and be consistent with applicable accessibility requirements; would comply with the Revised Street Tree Retention, Removal and Replacement Policy for the Sidewalk Repair Program as described in Section 2.4.4; and would comply with the Project Design Features (PDFs) included in the proposed Project and described in Chapter 3, *Environmental Impact Analysis*.

5.2.4 Alternative 3. Ordinance will exclude sidewalk repair projects that have the potential to affect known historic, tribal cultural, unique archaeological, or unique paleontological resources; such projects would proceed as discretionary projects under existing codes and policies.

Under Alternative 3, sidewalk repair projects that may result in significant adverse impacts on known historic, tribal cultural, unique archaeological, or unique paleontological resources, as these terms are defined by CEQA, would be ineligible for approval under the sidewalk repair program ordinance. Under this alternative, the City would continue to review and approve each such sidewalk repair project funded as a result of the Settlement on a case-by-case basis under existing codes and policies, and would require individual CEQA review and would not rely on this EIR for CEQA compliance. Approval of the Project construction sites within these parameters would proceed only on a case-by-case basis of discretionary approval consistent with existing practices, as opposed to a streamlined discretionary approval process as proposed under the Project. However,

because the Revised Street Tree Retention, Removal and Replacement Policy for the Sidewalk Repair Program would still be adopted by the City under Alternative 3, all Project construction sites funded by the Settlement would continue, regardless of the particular approval process employed. Compliance with the PDFs included in the Project and described in Chapter 3, *Environmental Impact Analysis*, would not be required for these sidewalk repair projects; instead any project design features or mitigation measures identified during the site-specific, case-by-case CEQA review would need to be implemented.

5.3 Alternatives Rejected From Further Consideration

The City considered several other alternatives during the course of this EIR, including those that were suggested during scoping and public review. However, not all of the alternatives have been carried forward for full analysis in this EIR for various reasons as discussed below. Pursuant to State CEQA Guidelines §15126.6(c), an EIR should “identify any alternatives that were considered by the lead agency but rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency’s determination.” The screening process for identifying viable EIR alternatives included consideration of an alternative’s ability to meet the Project objectives and reduce significant environmental impacts.

5.3.1 Alternative 4. The City will expend accelerate its annual funding commitment(s) in sidewalk repair funds pursuant to the *Willits* Settlement in 15 years rather than the Settlement’s 30-year compliance period.

Alternative 4 would involve compliance with the Settlement in a 15-year time period rather than 30 years. For this alternative, funding needs to be allocated at twice the proposed annual amount than for the proposed Project, so that twice as many construction activities can occur over a 15-year period instead of the 30 years of the proposed Project. This alternative would increase the annual miles of repair work to 74 miles per year for the first 5 years, with increases thereafter based on varying financial commitments every 5 years. The approximate total construction assumptions would be modified as shown in the table below.

Table 5-1. Approximate Total Project Construction

Year	Estimated Sidewalk Repair (square feet)	Estimated Sidewalk Repair Per Year (sq. ft.)	Crew Teams Per Year	Crew Teams Per Week
1-5	10,428,595	2,085,719	642	13
6-10	13,859,375	2,771,875	853	17
11-15	18,431,255	3,686,251	1,134	23
TOTAL	42,341,710			

The street tree replacement ratio would also be modified to 2:1 for years 1 through 5, 3:1 for years 6 through 10, and 2:1 for years 11 through 15. The following table identifies the estimated maximum

sidewalk repairs and street tree removal and replacements that would occur under this alternative in 5-year increments.

Table 5-2. Estimated Maximum Sidewalk Repair and Street Tree Removal under the Project

Year	Estimated Sidewalk Repair (square feet)	Estimated Street Tree Removal (trees)	Estimated Street Tree Replacement (trees) ¹
1-5	10,428,595	3,140	6,275
6-10	13,859,375	4,175	12,525
11-15	18,431,255	5,545	11,605
TOTAL	42,719,225	12,860	30,405

Source: BOE 2018.

¹ Based on street tree replacement of 2:1 for years 1 through 5, 3:1 for years 6 through 10, and 2:1 for years 11 through 15

No changes to the types of improvements, proposed construction activities, or construction scenarios for individual projects are proposed under this alternative. The average project site is still assumed to be 650 linear feet, with an average of one street tree removal with every repair site. The construction time period halved would mean that double the number of construction sites and construction crews would be working. Transportation, traffic, energy, greenhouse gases, and utilities like water would increase over the proposed Project because more work would be taking place in a shorter amount of time. The street tree replacement ratio for the 15-year alternative, however, would result in a street tree canopy loss at the end of Project implementation. As discussed in the biological resources section, the mature age of a street tree is found to be 15 years and, in a 15-year alternative, only the street trees planted during Year 1 would be matured. Therefore, there would be loss of street tree canopy at Year 15 even if all the sidewalk repair sites are completed. This 15-year alternative is not being considered for further analysis because it does not meet Project objective number 3.

5.3.2 Alternative 5. Ordinance to require use of only hand tools, for example, no jackhammering, no power tools, and no heavy equipment.

Under Alternative 5, the proposed new ordinance would revise the way sidewalk repair projects are reviewed and approved for only those projects that can be completed, in compliance with the *Willits* Settlement, using only hand tools and not requiring use of any of the heavy powered construction equipment described in Section 2.5.3.3.1, such as but not limited to jackhammers, loaders, compressors, and compactors. Any sidewalk repair projects that require the use of heavy construction equipment to be compliant with the *Willits* Settlement and applicable accessibility requirements would continue to be evaluated individually on a case-by-case basis, as under existing conditions, to determine whether further environmental review under CEQA is needed. This alternative was considered as a means to reduce noise impacts associated with the proposed Project.

Under Alternative 5, sidewalk repair projects that can be completed using only hand tools would proceed under ministerial approvals as long as they fall within the specific parameters of the construction scenarios described in Section 2.5.3 but without the use of the powered heavy construction equipment described in Section 2.5.3 (and thus using suitable replacement

tools/equipment), and would not cause noise and vibration impacts within 23 feet of residential uses or within 10 feet of commercial uses. If sidewalk repair projects can be completed using only hand tools—like hammers, wheel barrows, shovels, ropes, hand saws, and buckets—then there would be no noise impact from heavy equipment like a jackhammer. The continuation of the ongoing activities would take longer with hand tools than with power tools and heavy equipment. Both construction scenarios would be over 30 days, which would lead to more air, transportation, and utilities impacts. Due to each repair site taking a longer time, less sidewalks would be repaired in the City. The Sidewalk Repair Program Revised Street Tree Retention, Removal and Replacement Policy would be implemented, and all other PDFs included in the proposed Project and described in Chapter 3, *Environmental Impact Analysis*, would be implemented.

Implementing Alternative 5 would not be efficient or effective at implementing the *Willits* Settlement. The use of hand tools only and restriction of power tools and use of heavy equipment would take an extraordinary amount of time compared to traditional construction techniques. This would slow the implementation of the program and would not achieve the desired objectives or outcomes. In some cases, it may not be possible to remove the existing concrete and street trees without the use of power equipment, such as jackhammers, backhoes, and wood chippers. Therefore, this alternative has been rejected from further consideration and no further analysis is warranted.

5.3.3 Alternative 6. Avoid sidewalk repairs and street tree removals that would last longer than 30 construction days or require excavation greater than 30 feet.

This alternative would not include sidewalk repairs and street tree removals that would last longer than 30 construction days or require excavation greater than 30 feet. Under the proposed Project, one of the specific parameters under which individual sidewalk repairs would proceed ministerially pursuant to the new ordinance is that the project would last no more than 30 non-consecutive construction days in duration and require excavation depth of no greater than 30 feet. If the individual project does not meet this parameter, it would be subject to discretionary approval by the City Engineer or designee. Thus, sidewalk repair projects that would last longer than 30 construction days or require excavation greater than 30 feet are already excluded from the proposed ordinance.

The City could still pursue these projects through the individual discretionary process. Avoiding any sidewalk repairs and street tree removals that would last longer than 30 construction days or require excavation greater than 30 feet altogether, where such repairs are necessary, would conflict with the *Willits* Settlement if not addressed. One of the primary Project objectives is to ensure the continued and efficient compliance with the requirements of the *Willits* Settlement to maintain accessibility. Therefore, for the reasons stated above, this alternative has been rejected from further consideration, and no additional analysis is warranted.

5.3.4 Alternative 7. Ordinance to obtain ROW acquisition of private property to retain all street trees by meandering sidewalks and to place a construction noise barrier.

This alternative would include provisions in the proposed ordinance to allow for private property right-of-way (ROW) acquisition in order to avoid removal of all street trees where the street trees are the cause of sidewalk damage. Through this alternative, the City would be able to acquire private property to construct a 5-foot sidewalk, in order to avoid the street tree roots that have protruded the existing sidewalks. The street trees that have damaged the sidewalks would not be removed; however, in order to provide accessibility, a new sidewalk would have to be permanently constructed, or the existing sidewalk would need to be permanently redesigned, through private property. Use of private property would need a long-term acquisition and may need to be maintained by the owner, depending on the agreement. If a street tree is not diseased, dying, or dead, it will be root pruned and will continue to grow under the pavement.

ROW acquisition of private property, in this alternative, would also allow for a placement of a noise barrier during construction. This would reduce the impact of noise and vibration on sensitive uses. The barrier would be placed adjacent to the sensitive land use, if the construction is taking place fewer than 23 feet from residences and fewer than 10 feet from commercial buildings.

While the proposed Project does not explicitly prohibit the acquisition of private property to widen the sidewalks or meander around existing street trees, there is no guarantee that property owners would be willing to sell ROW or allow the City to obtain additional ROW or build noise walls within private property. Therefore, it cannot be determined with any certainty that this alternative is feasible without the use of eminent domain. The eminent domain process would be prohibitively expensive compared to the alternative to remove or prune obstructing street trees. Additionally, it should be noted that the *Willits* Settlement does not include ROW acquisition as one of the covered activities.

One of the primary Project objectives is to ensure the continued and efficient compliance with the requirements of the *Willits* Settlement to maintain accessibility. An additional Project objective is to complete all required sidewalk repair segments without the need to acquire additional property as part of the City's ROW. Therefore, for the reasons stated above, this alternative has been rejected from further consideration, and no additional analysis is warranted.

5.3.5 Alternative 8. Ordinance to mandate/test use of alternative/green/recycled construction materials for sidewalk and curb ramp repairs, where applicable.

During the EIR scoping process, commenters suggested that the sidewalk repairs be performed using alternative/green/recycled construction materials. Accordingly, an alternative was considered under which the proposed ordinance would mandate the use of alternative/green/recycled construction materials for all sidewalk and curb ramp repairs undertaken. As discussed in Section 3.9, *Land Use and Planning*, each individual sidewalk repair project arising under the Project would include several features that would be compatible with City sustainability goals and policies and sustainable construction guidelines. These features would include stormwater best management

practices (BMPs), safety protocols during construction, and green infrastructure design. A summary of the Project's consistency with the City's sustainability goals is provided in Tables 3.9-9 and 3.9-10.

The Project will implement best available technology and water conservation techniques for deep watering of newly planted street trees, and where feasible will install permeable surfaces and use cool surfaces. The pLAN strategies also include consideration of using low-emission concrete or other low-emissions materials. It should also be noted that the City is implementing an Alternative Materials pilot program to evaluate the effectiveness of alternatives to Portland Cement concrete in sidewalk repair, such as cementitious pavers and rubber materials and pavers. The City is continuing to evaluate the efficacy and cost-effectiveness of these alternative materials. However, at this time the feasibility and cost-effectiveness of using these materials in a widespread manner is unknown. The City will continue to evaluate each of the pilot sites to determine whether the use of alternative materials is feasible. Therefore, this alternative has been rejected from further consideration because no specific data are available on its viability and longevity for sidewalk repairs and no further analysis is warranted.

5.3.6 Alternative 9. Ordinance to include revision to the current BPW street tree policy for a higher than 2:1 street tree replacement to removal ratio.

This alternative would modify the proposed ordinance to require street tree replacement at a higher than 2:1 ratio for the replacement of removed street trees. An important component of the *Willits* Settlement sidewalk repairs is street tree root pruning as well as the removal and replacement of street trees. A 1:1 replacement of street trees would result in a net reduction in total street tree area and more replacement street trees would be required than street trees removed to result in a net balance of street tree canopy area. In June 2015, BPW adopted the Street Tree Removal Permit and Tree Replacement Condition Policies. The policies require all removed street trees to be replaced on a 2:1 basis. The street tree removal rate under the proposed Project is anticipated to escalate in association with the increasing extent of sidewalk repairs that similarly escalates through the program period.

To address the anticipated effect of the Project on the City street tree canopy, a numeric model was developed that would allow for examination of the effects of street tree removals and replacements under changing program variables, including street tree sizes removed, timing of street tree removals, and number and timing of replacement street tree planting (contained in Appendix B). The model was run for 26 total scenarios of street tree replanting as scaled against street tree removals, which explored the effects of altering parameters such as average replacement street tree size, street tree replacement ratios, front-end loading of street tree replacement, sensitivity testing of changing mortality rates, and application of variable replacement ratios.

Scenario 19 in the model shows the effect of street tree replacement multiplier with replacement with current street tree sizing practices (the calculated existing mean mature canopy diameter is 30.48 feet). Replacement at 2:1 would not surpass the cumulative loss over the 30-year period. The proposed Project includes a revised Street Tree Retention, Removal and Replacement Policy establishing a 2:1 street tree replacement to removal ratio requirement for the first 10 years (starting from July 2017), a 3:1 ratio for years 11 to 21, and a 2:1 ratio for the last 9 years of the 30-year program. Following this replacement ratio for the projected number of street trees removed would provide the City with net neutral street tree canopy by year 30.

Replacement at 5:2, 3:1, and 4:1 ratios would all exceed cumulative loss by year 30 (replacement at 4:1 would nearly double the change in canopy acres compared to 2:1 replacement). However, replacement at these higher ratios would result in additional costs to the City that would not garner much additional benefit. With replacement at the proposed ratios, no significant impacts would occur that would need to be mitigated or otherwise reduced with an alternative to replace street trees at a higher ratio. Additionally, one of the Project objectives is to ensure compliance with the City's replacement requirements as stipulated in the Project description. Therefore, this alternative has been rejected from further consideration and no additional analysis is warranted.

5.4 Comparison of Alternatives Analyzed

State CEQA Guidelines Section 15126.6(d) requires that "the EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project." Accordingly, this section provides a comparative discussion of potential impacts from the alternatives to the proposed Project carried forward for analysis in this EIR. Table 5-3 provides a summary of the impacts associated with each of the alternatives in relation to the impacts of the Project.

Table 5-3. Comparison of Impacts for Alternatives Carried Forward

Environmental Resource	Proposed Project	No Project Alternative	Alternative 1	Alternative 2	Alternative 3
<i>Aesthetics</i>	Significant	Significant +	Significant -	Significant =	Significant =
<i>Air Quality</i>	Less than Significant	Less than Significant =	Less than Significant Significant -	Less than Significant =	Less than Significant =
<i>Biological Resources</i>	Less than Significant	Less than Significant +	Less than Significant Significant -	Less than Significant =	Less than Significant =
<i>Cultural Resources</i>	Significant	Significant =	Significant =	Significant =	Less than Significant -
<i>Energy</i>	Less than Significant	Less than Significant +	Less than Significant Significant -	Less than Significant =	Less than Significant =
<i>Geology and Soils</i>	Less than Significant	Less than Significant =	Less than Significant Significant =	Less than Significant =	Less than Significant =
<i>Greenhouse Gas Emissions</i>	Less than Significant	Less than Significant +	Less than Significant Significant -	Less Than Significant Significant =	Less than Significant =
<i>Hazards and Hazardous Materials</i>	Less than Significant	Less than Significant =	Less than Significant Significant =	Less than Significant =	Less than Significant =
<i>Hydrology and Water Quality</i>	Less than Significant	Less than Significant =	Less than Significant Significant =	Less than Significant =	Less than Significant =
<i>Land Use and Planning</i>	Less than Significant	Less than Significant =	Less than Significant Significant +	Less than Significant =	Less than Significant =

Environmental Resource	Proposed Project	No Project Alternative	Alternative 1	Alternative 2	Alternative 3
<i>Noise</i>	Significant	Significant =	Significant -	Less Than Significant -	Significant =
<i>Public Services</i>	Less than Significant	Less than Significant =	Less than Significant -	Less than Significant =	Less than Significant =
<i>Transportation</i>	Less than Significant	Less than Significant =	Less than Significant -	Less than Significant =	Less than Significant =
<i>Tribal Cultural Resources</i>	Significant	Significant =	Significant =	Significant =	Less than Significant -
<i>Utilities and Service Systems</i>	Less than Significant	Less than Significant =	Less than Significant -	Less than Significant =	Less than Significant =
<i>Wildfire Hazards</i>	Less than Significant	Less than Significant =	Less than Significant =	Less than Significant =	Less than Significant =
Relative Impact Score		+4	-8	-1	-2

Notes: The + (plus) and - (minus) indicate relative comparison of impacts to the proposed Project.

(+) = Alternative would increase impact when compared with the proposed Project.

(-) = Alternative would reduce impact when compared with the proposed Project.

(=) = Alternative would have similar impacts when compared with the proposed Project and would be considered neutral.

5.4.1 No Project Alternative

Under the No Project Alternative, implementation of sidewalk repairs throughout the City would continue to occur pursuant to the City's obligations under the *Willits* Settlement Agreement using existing ordinances and policies. As such, sidewalk repairs and street tree removals would still occur, albeit at a slower rate than under the proposed Project due to the need for case-by-case approval under existing policies. Accordingly, under the No Project Alternative, it is anticipated that slightly less sidewalk would be repaired than under the Project. Removal and replacement of street trees will continue to occur in accordance with the existing Street Tree Removal Permit and Tree Replacement Condition Policies adopted by BPW in June 2015, at a 2:1 ratio.

5.4.1.1 Aesthetics

The No Project Alternative would not contribute to a loss of scenic vistas or a state scenic highway, or loss of focal views including natural views of topography, mountains, oceans, or man-made visual features. The No Project Alternative would result in similar conditions during construction as the Project because sidewalk and curb ramp repairs along with street tree removal and replacement would still continue under the existing procedures and policies. Temporary construction impacts from sidewalk repairs could affect the character of the local neighborhoods where the repairs would occur; however, these effects would be short term (generally fewer than 30 days at any given location) and would improve visual conditions over the long term. However, the long-term effect would differ, as street tree replacement would continue to be at a 2:1 replacement to removal ratio. As demonstrated in Appendix B, this replacement would not result in a net gain or neutral canopy by the end of the Project. The impacts would remain less than significant, but the No Project Alternative would not achieve the same level of net aesthetic benefit as the Project with respect to the mature street tree canopy.

Similar to the proposed Project, the No Project Alternative would alter Historic Cultural Monument (HCM) street trees and would result in a significant impact in areas where the Secretary of the Interior's (SOI's) standards cannot feasibly be implemented. In addition, as under the proposed Project, individual projects under the No Project Alternative would result in a significant impact on aesthetic or visual character in instances where the integrity of a cultural resource cannot be maintained, including when the aesthetic integrity of a known cultural resource is a contributing factor to a Historical Preservation Overlay Zone; or within an area of high sensitivity with respect to cultural resources; or in an area with known archaeological, paleontological, or tribal artifacts; or in an area with a designated HCM street tree.

5.4.1.2 Air Quality

Under the No Project Alternative, the nature of construction activities, operations, and location of individual sidewalk repair projects remain unchanged from the proposed Project and, as under the proposed Project, construction and operation would occur simultaneously at various times and locations (i.e., sidewalk repair/street tree removal and replacement street tree watering). However, due to the case-by-case approvals resulting in a slightly decreased amount of sidewalk repair under this alternative, the amount of annual construction and operations activities and their associated air pollutant emissions would be slightly less under this alternative compared to the proposed Project. Therefore, the No Project Alternative, like the proposed Project, would not exceed regional or localized regional significance thresholds established by the South Coast Air Quality Management

District (SCAQMD). Construction would be consistent with the objectives and policies of the General Plan and General Plan Framework, as construction activities would result in accommodating the mobility needs of people with disabilities, especially those with mobility disabilities, and would make all sidewalks compliant with applicable accessibility requirements. Given the brief duration of activities at each individual construction site, the limited intensity of construction equipment use due to site constraints, and considering that operations activities would not introduce any new substantial stationary or mobile sources of toxic air contaminant (TAC) emissions in the City, this alternative would also not pose carcinogenic risks to nearby sensitive receptors. Therefore, similar to the proposed Project, the No Project Alternative would be consistent with applicable SCAQMD and Southern California Association of Governments (SCAG) policies and would not expose sensitive receptors to substantial TAC concentrations. Impacts would be less than significant.

5.4.1.3 Biological Resources

Under the No Project Alternative, the nature of construction activities, operations, and location of individual sidewalk repair projects remain unchanged from the proposed Project and, as under the proposed Project, construction and operation would occur simultaneously at various times and locations (i.e., sidewalk repair/street tree removal and replacement street tree watering). Implementation of sidewalk repair projects under the No Project Alternative, while occurring at a slower rate, would not result in impacts on biological resources that are substantially different from those under the proposed Project.

The No Project Alternative would be implemented in a primarily urban landscape where there is little to no suitable habitat for any wildlife species, besides the canopy associated with street trees. No construction would occur in Section 404 regulated water bodies. Upon completion of construction activities, minor maintenance activities, such as street tree inspections and watering, would occur. Although sensitive wildlife species would be affected through the removal of trees and foraging habitat, such species are adapted to living in a heavily developed and disturbed urban setting. Construction noise is common throughout the City and unlikely to harm or harass such species. Construction impacts such as increased noise and light may have a significant impact on sensitive and resident wildlife species that occur within the sidewalk repair area; however, implementation of standard conditions would ensure that any impact associated with habitat interference would remain less than significant by providing detailed guidance on how to comply with the Migratory Bird Treaty Act (MBTA), replacing removed street trees promptly, avoiding any destruction of active nests, and complying with the California Fish and Game Code and other applicable requirements. Compliance with and implementation of the standard conditions would ensure that the species' normal behavior and chances for long-term survival would not be adversely affected by construction activities.

Like the proposed Project, the No Project Alternative would replace street trees that would be removed as part of the sidewalk repairs. However, the No Project Alternative would continue to replace street trees at 2:1 ratio in accordance with the existing policy and would not adopt or implement the new proposed street tree replacement policy that would implement replacement ratios of 2:1 for years 1 through 10, 3:1 for years 11 through 20, and 2:1 for years 21 through 30. Thus, while the No Project Alternative would eventually achieve a net neutral canopy, and would not result in significant impacts, this alternative would take a longer time to achieve net neutral and would not achieve the same level of benefit as the proposed Project.

5.4.1.4 Cultural Resources

Under the No Project Alternative, the nature of construction activities, operations, and location of individual sidewalk repair projects remain unchanged from the proposed Project and, as under the proposed Project, construction and operation would occur simultaneously at various times and locations (i.e., sidewalk repair/street tree removal and replacement street tree watering). As under the proposed Project, sites will be assessed for historical significance prior to the approval of any individual sidewalk repair and the existing Cultural Heritage Ordinance would still apply to HCM resources under the No Project Alternative. As discussed in Section 3.4, construction activities could result in the demolition of sidewalks, ramps, curbs, traffic signs, gutters, or other similar sidewalk-related features that are of historical significance. Similarly, construction could result in impacts on archaeological resources (e.g., uncover buried artifacts or features) and paleontological resources. Assessments would be required to determine historical significance, implementation of repairs and replacements in accordance with the SOI's standards, preparation of an Archaeological Treatment Plan, and/or preparation of a Paleontological Management Treatment Plan, as necessary. Although these assessments would reduce and minimize impacts, when the SOI's standards cannot be followed a substantial material change in the significance or integrity of a historical or archaeological resource occurs, even after following the SOI's standards, and significant impacts would result. Impacts associated with the disturbance of human remains would be less than significant because compliance with the existing laws and regulations for appropriate handling of any human remains that are encountered would occur.

5.4.1.5 Geology and Soils

Under the No Project Alternative, the nature of construction activities, operations, and location of individual sidewalk repair projects remain unchanged from the proposed Project and, as under the proposed Project, construction and operation would occur simultaneously at various times and locations (i.e., sidewalk repair/street tree removal and replacement street tree watering). Construction activities would be too shallow to cause significant geologic events (e.g., fault rupture, landslides, seismic ground shaking, liquefaction) or exacerbate geologic conditions. Geologic conditions in the area would remain unchanged as a result of the Sidewalk Repair Program. Similar to the proposed Project, landslide- and liquefaction-prone areas as well as areas with collapsible soils could expose workers to geologic hazards under this alternative. Implementation of shoring plans would minimize this impact in areas where excavation would be greater than 5 feet deep, as required per the Los Angeles Bureau of Engineering (BOE) Standard Specifications for Public Works Construction, or "Greenbook." Implementation of erosion and sediment control BMPs would prevent substantial soil erosion and sedimentation. In addition, construction activities would occur only in areas where sidewalks currently exist, not in areas where erosion could destabilize nearby structures. Construction activities would not create a geologic hazard by causing or accelerating instability related to erosion. Impacts would be less than significant.

5.4.1.6 Greenhouse Gas Emissions

Under the No Project Alternative, the nature of construction activities, operations, and location of individual sidewalk repair projects remain unchanged from the proposed Project and, as under the proposed Project, construction and operation would occur simultaneously at various times and locations (i.e., sidewalk repair/street tree removal and replacement street tree watering). However, due to the case-by-case approvals resulting in a slightly decreased amount of sidewalk repair under

this alternative, annual greenhouse gas (GHG) emissions from fuel combustion associated with heavy-duty construction equipment, vehicle trips, material deliveries, and trips by haul, water, and concrete trucks; and the number of vehicles used to conduct site assessments, inspections, and street tree watering would be slightly less under this alternative compared to the Project. Overall long-term carbon sequestration levels under the No Project Alternative would be slightly lower than those of the Project because the existing street tree removal and replacement policies would continue with the 2:1 replacement to removal ratio. Because no new street tree replacement to removal ratio would be approved (2:1 for 1 to 10 years; 3:1 for 11 through 21 years; 2:1 for 22 to 30 years), there would be fewer street trees planted in the City over 30 years. Fewer street trees in the absence of a new street tree ratio would result in less carbon dioxide and GHG absorption, which the leaves provide. However, similar to the Project, a net positive in carbon sequestration (because of removal of mature street trees and planting of saplings) would occur in future years. Impacts would be less than significant, but the No Project Alternative would not achieve the same level of benefit as the proposed Project.

5.4.1.7 Hazards and Hazardous Materials

Under the No Project Alternative, the nature of construction activities, operations, and location of individual sidewalk repair projects remain unchanged from the proposed Project and, as under the proposed Project, construction and operation would occur simultaneously at various times and locations (i.e., sidewalk repair/street tree removal and replacement street tree watering). The construction activities associated with the proposed Project would involve the routine transport, use, and disposal of hazardous materials, such as solvents, paints, oils, and grease—materials that are typically used in construction projects. Such transport, use, and disposal would be in compliance with applicable regulations (e.g., the Resource Conservation and Recovery Act, Occupational Safety and Health Administration regulations, Department of Transportation regulations, the California Labor Code, and the California Code of Regulations). Any hazardous materials used would generally be in small amounts and any spills that may occur would be contained and cleaned up according to the Material Safety Data Sheet/Globally Harmonized System in the appropriate manner. During Project excavation, contaminated groundwater and/or contaminated soil may occasionally be encountered, which could release hazardous materials into the environment, expose workers and nearby receptors to hazardous emissions, or expose contaminated groundwater. Similar to the proposed Project, implementation of existing regulations and BOE standards would minimize exposure to hazardous materials and require proper handling and oversight. Impacts would be less than significant.

5.4.1.8 Hydrology and Water Quality

Under the No Project Alternative, the nature of construction activities, operations, and location of individual sidewalk repair projects remain unchanged from the proposed Project and, as under the proposed Project, construction and operation would occur simultaneously at various times and locations (i.e., sidewalk repair/street tree removal and replacement street tree watering). The No Project Alternative would not affect the City's ability to implement or enforce its goals or policies or otherwise be inconsistent with regulatory requirements related to the minimization of water quality impacts. The construction and operations activities throughout the City under this alternative would not affect hydrology and water quality differently than the Project because they would not introduce new impervious surfaces or pollutants, increase flooding hazards, or affect groundwater supplies, and they would be consistent with related plans and programs. Construction activities would

improve existing sidewalk and not introduce new impervious surfaces; as such, they would not result in a permanent adverse change in the movement of surface water and overall drainage patterns would be maintained. Any changes to stormwater flows into the stormwater system would be temporary during construction only. No direct groundwater withdrawal would occur, and the alternative would not obstruct potential groundwater recharge. Construction would comply with the minimum construction site BMP requirements of the municipal separate sewer system (MS4) permit for erosion, sediment, non-stormwater management, and waste management, and the BMPs would be implemented during construction activities to reduce the potential for chemical contaminants to affect water quality.

The temporary reduction in street tree canopy from the replacement of mature street trees with younger and smaller street trees could alter street tree rainfall interception, which may temporarily increase surface runoff. The planted areas would be adequately watered during the establishment period, without erosion that would be detrimental to plantings.

Like under the Project, some sidewalk repairs could be within 100- and 500-year floodplains, which are potentially subject to flooding during storm events; however, flooding conditions would not be expected to change compared with existing conditions. Construction activities would not affect the overall flood zone or result in additional flooding because no new structures would be added to existing sidewalks that could redirect or exacerbate existing floodflows. Impacts would be less than significant.

5.4.1.9 Land Use

Under the No Project Alternative, the nature of construction activities, operations, and location of individual sidewalk repair projects remain unchanged from the proposed Project and, as under the proposed Project, construction and operation would occur simultaneously at various times and locations (i.e., sidewalk repair/street tree removal and replacement street tree watering). The primary differences are related to the streamlining of approvals under the proposed ordinance. Like under the proposed Project, implementation of the No Project Alternative would generally be within the public ROW and would not change or affect the adjacent and surrounding land uses. Unlike the Project, the No Project Alternative would not include the Revised Street Tree Retention, Removal and Replacement Policy for the Sidewalk Repair Program, but rather the existing policy to replace removed street trees at a 2:1 ratio would continue to be followed. Consistent with the applicable objectives and policies of the General Plan and Framework Element, sidewalk replacement and street tree replacements would help accommodate the needs of people with disabilities as well as the need for high-quality, safe pedestrian access on all sidewalks by ensuring that sidewalks would be in compliance with applicable accessibility requirements. The No Project Alternative would be consistent with the applicable sidewalk, infrastructure, mobility, sustainability, and street tree policies identified in Mobility Plan 2035, an element of the General Plan and the Framework Element. Implementation of this alternative would not conflict with existing land use plans, policies, or regulations of agencies with jurisdiction over the Project area. Impacts would be less than significant.

5.4.1.10 Noise

The No Project Alternative would not be different than the proposed Project because sidewalk and curb ramp repairs along with street tree removal and replacement would still continue under the existing procedures and policies. The noise impacts of the No Project Alternative would be similar to

those of the proposed Project, even with the sidewalk repairs occurring at a slower rate than under the Project.

Under the No Project Alternative, the nature of construction activities, operations, and location of individual sidewalk repair projects remain unchanged from the proposed Project and, as under the proposed Project, construction and operation would occur simultaneously at various times and locations (i.e., sidewalk repair/street tree removal and replacement street tree watering). Implementation of sidewalk repair projects under the No Project Alternative would not result in noise impacts that are different from those under the proposed Project. Similar to the proposed Project, construction activities under this alternative would result in a significant noise impact if a 10-foot distance for commercial sensitive uses or a 20-foot distance for residential sensitive uses cannot be maintained from the construction noise source. In most cases, the calculated interior sound level would not exceed the Project-specific interior threshold of 85 A-weighted decibels, equivalent noise level (8 hours), through the various phases of construction activities. In addition, construction would be short term in duration, and no hearing damage would occur. However, some individual sidewalk projects under this alternative may not be able to maintain a 10-foot distance for commercial sensitive uses or a 20-foot distance for residential sensitive uses from the construction noise source, which would result in significant impacts. Construction noise BMPs would be implemented to minimize noise impacts from construction activities.

Similarly, some construction activities could result in substantial vibration impacts. The impact would be less than significant for the vast majority of construction sites. However, where the distance from the construction vibration source to the building foundation of the nearest structure is fewer than 8 feet or where the distance to the nearest occupied space of a sensitive use is fewer than 23 feet, temporary significant impacts would occur. Exceedances of the applicable construction noise thresholds would still occur even after implementation of the construction vibration BMPs. Impacts would be significant.

Similar to the proposed Project, the No Project Alternative would not result in any permanent change to noise levels; it would not expose people residing or working in the project site area to, or otherwise generate, excessive noise levels and this impact would be less than significant.

5.4.1.11 Public Services

Under the No Project Alternative, the nature of construction activities, operations, and location of individual sidewalk repair projects remain unchanged from the proposed Project and, as under the proposed Project, construction and operation would occur simultaneously at various times and locations (i.e., sidewalk repair/street tree removal and replacement street tree watering). Demand for additional public services is usually created when there is a net increase in population in an area as a result of a project. The No Project Alternative would not result in an increase in population because the construction crews employed to repair and maintain the sidewalks or remove and replace the street trees would not require relocated housing during construction. The sidewalks being repaired are existing sidewalks that are already serving the existing population and would not lead to increased population growth. The increased annual construction activities for sidewalk repairs and tree removal/replacement under the No Project Alternative have the potential to temporarily increase the demand on police services and affect their response times due to temporary lane and road closures, which may also delay emergency responders. However, the lane closures would be infrequent and limited to small portions of streets, and would not result in mobility conditions that would be substantially different from existing conditions on roadways.

Project construction would also comply with requirements and policies relating to fire safety practices, and projects would comply with the current edition of the Work Area Traffic Control Handbook (WATCH) manual. Therefore, there is no need for additional fire protection services apart from the existing level of service available within the City. Construction staging is also not expected to inhibit access to police or fire protection facilities. No other element of the continuing construction activities or operations (such as watering and inspecting the street trees) has the potential to increase the population, nor would it require the expansion of existing or construction of new fire, police, school, library, or park facilities. Impacts on public services would be less than significant.

5.4.1.12 Transportation

Under the No Project Alternative, the nature of construction activities, operations, and location of individual sidewalk repair projects remain unchanged from the proposed Project and, as under the proposed Project, construction and operation would occur simultaneously at various times and locations (i.e., sidewalk repair/street tree removal and replacement street tree watering). Due to the case-by-case approvals of sidewalk repair that would occur under the No Project Alternative, it is anticipated that the total number of repair sites would be slightly less under this Alternative compared to the Project. However, like under the Project, the maximum estimated daily construction trip generation at any single repair site would remain at 76 daily trips (with up to approximately half of that total expected during peak hours) (see Section 3.13.3.6) due to the anticipated nature of construction activities per site under the No Project Alternative. Construction activities under this alternative would involve lane closures and parking restrictions and would generate worker commute trips, as well as construction material hauling trips, some of which would occur during peak traffic hours and affect roadway operations near repair sites. However, construction activities would be geographically widely distributed throughout the City, the project would generate a relatively low number of trips at any individual construction site, and the effects of lane closures and parking restrictions would be minimized through compliance with Los Angeles Municipal Code (LAMC) Section 62.61 and the WATCH manual, as well as through the use of flagpersons. Therefore, temporary traffic impacts would not be substantial during construction, which may last up to 30 days at any construction site.

The likely impacts on bus stops would be limited to the maximum 30-day construction period and would be coordinated with the appropriate transit providers to ensure that effects on bus riders would be minimized. In addition, due to the short-term duration of loss of access related to driveway obstructions, parking spaces, and disruptions to pedestrian travel and coordination of construction activities with affected property owners and occupants, impacts related to potential temporary loss of access would be less than significant. Activities under this alternative involve rehabilitation, maintenance, replacement, safety, and repair projects designed to improve the condition of existing transportation assets and would not add motor vehicle capacity; as such, the No Project Alternative is not likely to lead to substantial or measurable increases in vehicle travel. This alternative, like the proposed Project, does not require further assessment for residential street impacts because the operational activities from the Project would not generate a net increase of 250 or more daily vehicle trips. Impacts would be less than significant.

5.4.1.13 Tribal Cultural Resources

Under the No Project Alternative, the nature of construction activities, operations, and location of individual sidewalk repair projects remain unchanged from the proposed Project and, as under the

proposed Project, construction and operation would occur simultaneously at various times and locations (i.e., sidewalk repair/street tree removal and replacement street tree watering). Tribal cultural resources (TCRs) may be found throughout the City of Los Angeles and it is difficult to document TCRs with precise locations. Construction activities associated with trenching and deeper excavations, as opposed to more surficial disturbances, have the potential to uncover or disturb TCRs. Even with standard conditions to manage unforeseen circumstances, such as the unexpected discovery of TCRs, impacts could nonetheless still occur and would be considered significant where the integrity and significance of TCRs cannot be maintained.

5.4.1.14 Utilities and Service Systems

Under the No Project Alternative, the nature of construction activities, operations, and location of individual sidewalk repair projects remain unchanged from the proposed Project and, as under the proposed Project, construction and operation would occur simultaneously at various times and locations (i.e., sidewalk repair/street tree removal and replacement street tree watering). Implementation of sidewalk repair projects under the No Project Alternative would not result in impacts on utilities and service systems that are substantially different from those under the proposed Project with respect to being adequately served by existing and planned water infrastructure; not exceeding the future planned drainage capacity (as defined in the City General Plan) or the wastewater treatment requirements of the Los Angeles Regional Water Quality Control Board (RWQCB); and not conflicting with solid waste policies and objectives in the City Solid Waste Management Policy Plan, Framework Element, or Source Reduction and Recycling Element.

Considering that slightly less sidewalk would be repaired under the No Project Alternative, the total annual water demand, wastewater generation, and waste generation would be slightly less than under the proposed Project. Similar to the proposed Project, it is not anticipated that the demand for water under the No Project Alternative would exceed existing water supply, and the wastewater generated would remain within capacity of existing treatment facilities. Similar to the proposed Project, it is anticipated that the waste infrastructure that would be required for the No Project Alternative would be addressed and planned for in subsequent iterations of the relevant planning documents, such as the Solid Waste Integrated Resources Plan (SWIRP).

5.4.1.15 Energy

Under the No Project Alternative, the nature of construction activities, operations, and location of individual sidewalk repair projects remain unchanged from the proposed Project and, as under the proposed Project, construction and operation would occur simultaneously at various times and locations (i.e., sidewalk repair/street tree removal and replacement street tree watering).

As under the Project, the removal of street trees under this alternative could indirectly increase electricity consumption because of the urban heat island effect. However, with the implementation of the existing street tree replacement policy at a 2:1 ratio under the No Project Alternative, the street tree canopy would be replenished over time and eventually result in a net neutral size. Thus, the replacement would offset the temporary urban heat island effects. It should be noted that it would take longer to reach net neutral size with a 2:1 replacement ratio compared to the proposed Project, which would include a new street tree replacement policy of 2:1 for 1 to 10 years, 3:1 for 11 to 21 years, and 2:1 for 22 to 30 years. Impacts related to electricity consumption would be less than significant, but the No Project Alternative would not achieve the same level of benefit as the proposed Project.

With the number of repair sites under the No Project Alternative being slightly less than under the proposed Project, the related use of heavy-duty construction equipment, worker trips to and from construction sites, material delivery and disposal trips, and loading demolition debris into trucks, all of which lead to transportation fuel consumption, would also be comparably less. The total consumption of transportation fuel under the No Project Alternative would be slightly less than the Project (which is at approximately 3.3 million gallons, or 418,456 British thermal units [BTUs] for construction and 318,690 gallons or approximately 41,280 BTUs for operations; Section 3.15.3.4). Similar to the proposed Project, the City would use a fleet of fuel-efficient vehicles for all work, which would reduce the demand for transportation fuels. Construction activities would rely on diesel-powered generators to produce the electricity required to operate electrical equipment. Similar to the proposed Project, it is anticipated that the utilities would address electricity demands within their respective service territories, which are under the oversight of the California Public Utilities Commission, and plan for utility demand through their annual Energy Resource Recovery Account proceedings in which energy forecasts are refined. The No Project Alternative would not have a detrimental effect on local and regional energy supplies or requirements for additional capacity, nor would it impede a local utility's ability to meet the peak- and base-period demand for electricity and other forms of energy. The No Project Alternative would not result in the wasteful, inefficient, or unnecessary consumption of energy. There would be a less-than-significant impact related to electricity and transportation fuel consumption. Impacts would be less than significant.

5.4.1.16 Wildfire

Implementation of sidewalk repair projects under the No Project Alternative would not result in wildfire impacts that would be different from those under the proposed Project. Under this alternative, the nature of construction activities, operations, and location of individual sidewalk repair projects remain unchanged from the proposed Project. Some repairs would continue to occur in areas that are designated as Very High Fire Hazard Severity Zones. The work would be performed on concrete sidewalks, curbs, gutters, ramps, and other existing built-environment infrastructure. The materials involved are not flammable, and work would not be performed near flammable materials that would exacerbate wildfire risks. Compliance with existing laws, such as those in the LAMC, Fire Code Section 57, et seq., for construction sites on, adjacent to, or in the immediate vicinity of a Very High Fire Hazard Severity Zone would further minimize potential risks. Impacts would be less than significant.

5.4.2 Alternative 1. Ordinance to repair sidewalks and avoid removal of any street trees.

Under this alternative, the new proposed ordinance would allow for ministerial approval of sidewalk repairs only when root pruning is a viable option for addressing street tree-related sidewalk damage; it would prohibit the removal of any street trees as part of the Project. This would include prohibiting the removal of street trees as part of any discretionary sidewalk repair process carried out under the *Willits* Settlement. Any funding under the Sidewalk Repair Program would be used to repair only those sidewalks that do not involve street tree removals, although dead and dying street trees would continue to be removed by the City if determined by a City arborist to pose a threat to human health and safety or private property.

Any construction scenarios described in the Project description that involve street tree removal would not occur, including, but not limited to, street tree removal, street tree planting, and street

tree planting cleanup; other activities related to the construction scenarios are expected to be the same (see Section 2.5.3.4). As noted in Section 5.2.3, the total amount of sidewalk repairs that would be completed under Alternative 1 would be less than under the proposed Project. Because there would be no street tree removals under this alternative, no street tree replacements would need to occur; therefore, under Alternative 1, no operations activities described under the proposed Project would occur, such as continued replacement street tree monitoring and watering with a hose that is attached to a water tank on a pick-up truck. Under this alternative, no changes related to the proposed new Street Tree Retention, Removal and Replacement Policy would occur.

5.4.2.1 Aesthetics

This alternative would not contribute to a loss of scenic vistas or a state scenic highway, or loss of focal views including natural views of topography, mountains, oceans, or man-made visual features. Alternative 1 would result in similar conditions during construction as the proposed Project because sidewalk and curb ramp repairs would continue; however, any street tree removal would not occur and, consequently, no street tree planting would be needed.

Temporary construction impacts from sidewalk repairs could affect the character of the local neighborhoods where the repairs would occur; however, these effects would be short term (generally fewer than 30 days at any given location) and would improve visual conditions with respect to sidewalks over the long term. The short-term impact would be less than the proposed Project because street trees would not be removed under this alternative. Because street trees would not be removed, no replacements would occur at an increased ratio, and thus the street tree canopy would be reduced compared to the proposed Project (which has 2:1 and 3:1 replacement ratios),

Because no street trees would be removed, this alternative would avoid aesthetic impacts on HCM street trees, but as under the proposed Project, individual projects under this alternative would result in a significant impact on aesthetic or visual character in instances where the integrity of a cultural resource cannot be maintained, including when the aesthetic integrity of a known cultural resource is a contributing factor to a Historical Preservation Overlay Zone; or within an area of high sensitivity with respect to cultural resources; or in an area with known archaeological, paleontological, or tribal artifacts.

5.4.2.2 Air Quality

Under Alternative 1, while the nature of sidewalk repair construction activities would generally be similar to that of the proposed Project, no street tree removals or replacements would occur and no operations activities described for the proposed Project would occur, as no street trees would be removed or replaced that would require monitoring or watering. Therefore, due to less sidewalk being repaired and no street trees being removed and replaced under this alternative, the amount of annual construction activities and their associated air pollutant emissions would be less compared to the proposed Project. As such, Alternative 1 would not exceed regional or localized regional significance thresholds established by SCAQMD. Construction would be consistent with the objectives and policies of the General Plan and General Plan Framework, as construction activities would result in accommodating the mobility needs of people with disabilities, especially those with mobility disabilities, and would make sidewalks that do not require street tree removals compliant with applicable accessibility requirements. Given the brief duration of activities at each individual project site, the limited intensity of construction equipment use due to site constraints, and

considering that there would be no operations activities, this alternative would also not pose carcinogenic risks to nearby sensitive receptors. Therefore, similar to the proposed Project, Alternative 1 would be consistent with applicable SCAQMD and SCAG policies and would not expose sensitive receptors to substantial TAC concentrations, and overall would have fewer air quality impacts than the Project. Impacts would be less than significant.

5.4.2.3 Biological Resources

Under Alternative 1, while the nature of sidewalk repair construction activities would generally be similar to that of the proposed Project, no street tree removals or replacements would occur and no operations activities described for the proposed Project would occur, as no street trees would be removed or replaced that would require monitoring or watering. Alternative 1 would be implemented in a primarily urban landscape where there is little to no suitable habitat for any wildlife species, besides the canopy associated with street trees. No construction would occur in Section 404 regulated water bodies. With the avoidance of street tree removal, this alternative would have a reduced short-term impact relative to the proposed Project that is associated with the removal of nesting and foraging habitat provided by the street tree canopy. Because trees would not be removed, no replacements would occur at an increased ratio, and thus the street tree canopy over time would be reduced compared to the proposed Project (which has 2:1 and 3:1 replacement ratios). The prohibition of any street tree removals under this alternative would, over time, affect the City's street tree canopy negatively and would not result in the same benefit as the proposed Project.

Construction noise associated with sidewalk repairs would continue to occur, which is common throughout the City and unlikely to harm or harass sensitive species. Construction impacts such as increased noise may have a significant impact on sensitive and resident wildlife species that occur within the sidewalk repair area; however, implementation of standard conditions would ensure that any impact associated with habitat interference would remain less than significant, including by providing detailed guidance on how to avoid "take" of species protected by the MBTA, replacing removed street trees promptly, avoiding any destruction of active nests, and complying with the California Fish and Game Code and other applicable requirements. Compliance with and implementation of the standard conditions would ensure that the species' normal behavior and chances for long-term survival would not be adversely affected by construction activities.

Therefore, while Alternative 1 would not result in significant impacts, nor would it result in short-term loss of foraging and nesting habitat as it would not remove any street trees, this alternative would not achieve the same level of long-term biological benefit as the proposed Project.

5.4.2.4 Cultural Resources

Under Alternative 1, while the nature of sidewalk repair construction activities would generally be similar to that of the proposed Project, no street tree removals or replacements would occur and no operations activities described for the proposed Project would occur, as no street trees would be removed or replaced that would require monitoring or watering. Therefore, due to less sidewalk being repaired under this alternative, the amount of annual construction activities Citywide would be less compared to the proposed Project. As under the proposed Project, under PDF-CUL-1, sites will be assessed for historical significance prior to the approval of any individual sidewalk repair and the existing Cultural Heritage Ordinance would still apply to HCM resources under Alternative 1. As discussed in Section 3.4, construction activities could result in the demolition of sidewalks,

ramps, curbs, traffic signs, gutters, or other similar sidewalk-related features that are of historical significance. Similarly, construction could result in impacts on archaeological resources (e.g., uncover buried artifacts or features) and paleontological resources. Implementation of PDFs (PDF-CUL-1 through PDF-CUL-4) would require an assessment of historical significance, implementation of repairs and replacements in accordance with the SOI's standards, preparation of an Archaeological Treatment Plan, and/or preparation of a Paleontological Management Treatment Plan, as necessary.

Although these assessments would reduce and minimize impacts, when the SOI's standards cannot be followed a substantial material change in the significance or integrity of a historical or archaeological resource occurs, even after following the SOI's standards, and significant impacts would result. Impacts associated with the disturbance of human remains would be less than significant because compliance with the existing laws and regulations for appropriate handling of any human remains that are encountered would occur.

5.4.2.5 Geology and Soils

Under Alternative 1, while the nature of sidewalk repair construction activities would generally be similar to that of the proposed Project, no street tree removals or replacements would occur and no operations activities described for the proposed Project would occur, as no street trees would be removed or replaced that would require monitoring or watering. Therefore, due to less sidewalk being repaired under this alternative, the amount of annual construction activities Citywide would be less compared to the proposed Project. Construction activities would be too shallow to cause significant geologic events (e.g., fault rupture, landslides, seismic ground shaking, liquefaction) or exacerbate geologic conditions. Geologic conditions in the area would remain unchanged as a result of the Sidewalk Repair Program. Similar to the proposed Project, landslide- and liquefaction-prone areas as well as areas with collapsible soils could expose workers to geologic hazards under this alternative. Implementation of shoring plans would minimize this impact in areas where excavation would be greater than 5 feet deep, as required per the Greenbook. Implementation of erosion and sediment control BMPs would prevent substantial soil erosion and sedimentation. In addition, construction activities would occur only in areas where sidewalks currently exist, not in areas where erosion could destabilize nearby structures. Construction activities would not create a geologic hazard by causing or accelerating instability related to erosion. Impacts would be less than significant.

5.4.2.6 Greenhouse Gas Emissions

Under Alternative 1, while the nature of sidewalk repair construction activities would generally be similar to that of the proposed Project, no street tree removals or replacements would occur and no operations activities described for the proposed Project would occur, as no street trees would be removed or replaced that would require monitoring or watering. Therefore, due to less sidewalk being repaired under this alternative, the amount of annual construction activities Citywide would be less compared to the proposed Project. Accordingly, the associated annual GHG emissions from fuel combustion associated with heavy-duty construction equipment, vehicle trips, material deliveries, and trips by haul, water, and concrete trucks; and the number of vehicles used to conduct site assessments, inspections, and street tree watering would be the less under this alternative compared to the Project.

Carbon sequestration under Alternative 1 would likely be greater in the short term due to no street trees being removed and all mature street trees being maintained; accordingly, the loss in carbon sequestered due to the replacement of full-grown street trees with saplings would not occur. However, the increase in the number of street trees in the street tree canopy that would occur under the Project that would ultimately result in a net positive gain in carbon sequestration in future years beyond the Project's horizon would not be realized under Alternative 1. In addition, the presence of diseased, dead, or damaged street trees throughout the City and the avoidance of any street tree removals under this alternative would, over time, affect the City's street tree canopy negatively and would not achieve the same benefit as the proposed Project. Fewer street trees in the absence of a new street tree ratio would result in less carbon being sequestered, which the leaves provide. Impacts would be less than significant but Alternative 1 would not achieve the same level of benefit as the proposed Project.

5.4.2.7 Hazards and Hazardous Materials

Under Alternative 1, while the nature of sidewalk repair construction activities would generally be similar to that of the proposed Project, no street tree removals or replacements would occur and no operations activities described for the proposed Project would occur, as no street trees would be removed or replaced that would require monitoring or watering. Therefore, due to less sidewalk being repaired under this alternative, the amount of annual construction activities Citywide would be less compared to the proposed Project. The construction activities associated with the proposed Project would involve the routine transport, use, and disposal of hazardous materials, such as solvents, paints, oils, and grease—materials that are typically used in construction projects. Such transport, use, and disposal would be in compliance with applicable regulations (e.g., the Resource Conservation and Recovery Act, Occupational Safety and Health Administration regulations, Department of Transportation regulations, the California Labor Code, and the California Code of Regulations). Any hazardous materials used would generally be in small amounts and any spills that may occur would be contained and cleaned up according to the Material Safety Data Sheet/Globally Harmonized System in the appropriate manner. During Project excavation, contaminated groundwater and/or contaminated soil may occasionally be encountered, which could release hazardous materials into the environment, expose workers and nearby receptors to hazardous emissions, or expose contaminated groundwater. Similar to the proposed Project, implementation of existing regulations and BOE standards would minimize exposure to hazardous materials and require proper handling and oversight. Impacts would be less than significant.

5.4.2.8 Hydrology and Water Quality

Under Alternative 1, while the nature of sidewalk repair construction activities would generally be similar to that of the proposed Project, no street tree removals or replacements would occur and no operations activities described for the proposed Project would occur, as no street trees would be removed or replaced that would require monitoring or watering. Therefore, due to less sidewalk being repaired under this alternative, the amount of annual construction activities Citywide would be less compared to the proposed Project. Alternative 1 would not affect the City's ability to implement or enforce its goals or policies or otherwise be inconsistent with regulatory requirements related to the minimization of water quality impacts.

The construction activities throughout the City under this alternative would not affect hydrology and water quality differently than the Project because they would not introduce new impervious surfaces or pollutants, increase flooding hazards, or affect groundwater supplies, and they would be

consistent with related plans and programs. Construction activities would improve existing sidewalk and not introduce new impervious surfaces; as such, they would not result in a permanent adverse change in the movement of surface water and overall drainage patterns would be maintained. Any changes to stormwater flows into the stormwater system would be temporary during construction only. No direct groundwater withdrawal would occur, and the alternative would not obstruct potential groundwater recharge. Construction would comply with the minimum construction site BMP requirements for erosion, sediment, non-stormwater management, and waste management, and the BMPs would be implemented during construction activities to reduce the potential for chemical contaminants to affect water quality. However, this alternative would not result in the temporary reduction in street tree canopy that could alter street tree rainfall interception, thereby temporarily increasing surface runoff.

Like under the Project, some sidewalk repairs could be within 100- and 500-year floodplains, which are potentially subject to flooding during storm events; however, flooding conditions would not be expected to change compared with existing conditions. Construction activities would not affect the overall flood zone or result in additional flooding because no new structures would be added to existing sidewalks that could redirect or exacerbate existing floodflows. Impacts would be less than significant.

5.4.2.9 Land Use

Under Alternative 1, while the nature of sidewalk repair construction activities would generally be similar to that of the proposed Project, no street tree removals or replacements would occur and no operations activities described for the proposed Project would occur, as no street trees would be removed or replaced that would require monitoring or watering. Therefore, due to less sidewalk being repaired under this alternative, the amount of annual construction activities Citywide would be less compared to the proposed Project. The primary differences are related to the streamlining of approvals under the proposed ordinance. Like under the proposed Project, implementation of Alternative 1 would generally be within the public ROW and would not change or affect the adjacent and surrounding land uses. Unlike the Project, Alternative 1 would not remove any street trees or include the Revised Street Tree Retention, Removal and Replacement Policy. Therefore, this alternative would not replace trees at a higher ratio, and hence would not realize the same benefit to the street tree canopy by year 30.

Consistent with the applicable objectives and policies of the General Plan and Framework Element, sidewalk repairs would help accommodate the needs of people with disabilities as well as the need for high-quality, safe pedestrian access on all sidewalks by ensuring that sidewalk repairs that do not require street tree removals would be in compliance with applicable accessibility requirements. However, with Alternative 1, not all sidewalks that may need to be repaired would receive repairs where street tree removal would be necessary in order to make such repairs. Where applicable, Alternative 1 would be consistent with the applicable sidewalk, infrastructure, mobility, and sustainability policies (minus established street tree policies) identified in Mobility Plan 2035, an element of the General Plan and the Framework Element. Therefore, while implementation of this alternative would not conflict with existing land use plans, policies, or regulations of agencies with jurisdiction over the Project area, it would not achieve the same level of benefit as the proposed Project. Impacts would be less than significant.

5.4.2.10 Noise

Under Alternative 1, while the nature of sidewalk repair construction activities would generally be similar to that of the proposed Project, no street tree removals or replacements would occur and no operations activities described for the proposed Project would occur, as no street trees would be removed or replaced that would require monitoring or watering. Therefore, due to less sidewalk being repaired under this alternative, the amount of annual construction activities Citywide would be less compared to the proposed Project.

The noise impacts from Alternative 1 would not be substantially different from those of the proposed Project because sidewalk and curb ramp repairs would still occur. However, any construction noise associated with street tree removals and replacements would not occur, such as from equipment listed in Table 3.10-7 (flatbed truck, saw, wood-chipper, stump grinder, skid steer loader, mini excavator). Because the noise from this equipment is less than the noise from demolition and concrete removal, the noise impacts would be similar. Similar to the proposed Project, construction activities under this alternative would result in a significant noise impact if a 10-foot distance for commercial sensitive uses or a 20-foot distance for residential sensitive uses cannot be maintained from the construction noise source. In most cases, the calculated interior sound level would not exceed the Project-specific interior threshold of 85 A-weighted decibels, equivalent noise level (8 hours), through the various phases of construction activities. In addition, construction would be short term in duration, and no hearing damage would occur. However, some individual sidewalk projects under this alternative may not be able to maintain a 10-foot distance for commercial sensitive uses or a 20-foot distance for residential sensitive uses from the construction noise source, which would result in significant impacts. Construction noise BMPs would be implemented to minimize noise impacts from construction activities.

Similarly, some construction activities could result in substantial vibration impacts. The impact would be less than significant for the vast majority of construction sites. However, where the distance from the construction vibration source to the building foundation of the nearest structure is fewer than 8 feet or where the distance to the nearest occupied space of a sensitive use is fewer than 23 feet, temporary significant impacts would occur. Exceedances of the applicable construction noise thresholds would still occur even after implementation of the construction vibration BMPs. Impacts would be significant.

Similar to the proposed Project, Alternative 1 would not result in any permanent change to noise levels; it would not expose people residing or working in the project site area to, or otherwise generate, excessive noise levels and this impact would be less than significant.

5.4.2.11 Public Services

Under Alternative 1, while the nature of sidewalk repair construction activities would generally be similar to that of the proposed Project, no street tree removals or replacements would occur and no operations activities described for the proposed Project would occur, as no street trees would be removed or replaced that would require monitoring or watering. Therefore, due to less sidewalk being repaired under this alternative, the amount of annual construction activities Citywide would be less compared to the proposed Project. Demand for additional public services is usually created when there is a net increase in population in an area as a result of a project. Alternative 1 would not result in an increase in population because the construction crews employed to repair and maintain the sidewalks would not require relocated housing during construction. The sidewalks being

repaired are existing sidewalks that are already serving the existing population and would not lead to increased population growth. The increased annual construction activities for sidewalk repairs have the potential to temporarily increase the demand on police services and affect their response times due to temporary lane and road closures, which may also delay emergency responders. However, the lane closures would be infrequent and limited to small portions of streets, and would not result in mobility conditions that would be substantially different from existing conditions on roadways. Project construction would also comply with requirements and policies relating to fire safety practices, and projects would comply with the current edition of the WATCH manual. Therefore, there is no need for additional fire protection services apart from the existing level of service available within the City. Construction staging is also not expected to inhibit access to police or fire protection facilities. No other element of the continuing construction activities has the potential to increase the population, nor would it require the expansion of existing or construction of new fire, police, school, library, or park facilities. Impacts on public services would be less than significant.

5.4.2.12 Transportation

Under Alternative 1, while the nature of sidewalk repair construction activities would generally be similar to that of the proposed Project, no street tree removals or replacements would occur and no operations activities described for the proposed Project would occur, as no street trees would be removed or replaced that would require monitoring or watering. Therefore, due to less sidewalk being repaired under this alternative, the amount of annual construction activities Citywide would be less compared to the proposed Project. As noted in Table 2-5, there are no truck trips distinctly associated with street tree removal and planting activities. Consequently, similar to the proposed Project, the maximum estimated daily construction trip generation at any single repair site would remain at 76 daily trips (with up to approximately half of that total expected during peak hours) (see Section 3.13.3.6) due to the anticipated nature of construction activities per site under this alternative. Construction activities under this alternative would also involve lane closures and parking restrictions and would generate worker commute trips, as well as construction material hauling trips, some of which would occur during peak traffic hours and affect roadway operations near repair sites. However, construction activities would be geographically widely distributed throughout the City, the project would generate a relatively low number of trips at any individual construction site, and the effects of lane closures and parking restrictions would be minimized through compliance with LAMC Section 62.61 and the WATCH manual, as well as through the use of flagpersons. Therefore, temporary traffic impacts would not be substantial during construction, which may last up to 30 days at any construction site.

The likely impacts on bus stops would be limited to the maximum 30-day construction period and would be coordinated with the appropriate transit providers to ensure that effects on bus riders would be minimized. In addition, due to the short-term duration of loss of access related to driveway obstructions, parking spaces, and disruptions to pedestrian travel and coordination of construction activities with affected property owners and occupants, impacts related to potential temporary loss of access would be less than significant. Activities under this alternative involve rehabilitation, maintenance, safety, and repair projects designed to improve the condition of existing transportation assets and would not add motor vehicle capacity; as such, Alternative 1 is not likely to lead to substantial or measurable increases in vehicle travel. This alternative, like the proposed Project, does not require further assessment for residential street impacts because the operational

activities from the Project would not generate a net increase of 250 or more daily vehicle trips. Impacts would be less than significant.

5.4.2.13 Tribal Cultural Resources

Under Alternative 1, while the nature of sidewalk repair construction activities would generally be similar to that of the proposed Project, no street tree removals or replacements would occur and no operations activities described for the proposed Project would occur, as no street trees would be removed or replaced that would require monitoring or watering. Therefore, due to less sidewalk being repaired under this alternative, the amount of annual construction activities Citywide would be less compared to the proposed Project. TCRs may be found throughout the City of Los Angeles and it is difficult to document TCRs with precise locations. Construction activities associated with trenching and deeper excavations required for utility relocations, as opposed to more surficial disturbances, have the potential to uncover or disturb TCRs. Even with standard conditions to manage unforeseen circumstances, such as the unexpected discovery of TCRs, impacts could nonetheless still occur and would be considered significant where the integrity and significance of TCRs cannot be maintained.

5.4.2.14 Utilities and Service Systems

Under Alternative 1, while the nature of sidewalk repair construction activities would generally be similar to that of the proposed Project, no street tree removals or replacements would occur and no operations activities described for the proposed Project would occur, as no street trees would be removed or replaced that would require monitoring or watering. Therefore, due to less sidewalk being repaired under this alternative, the amount of annual construction activities would be less compared to the proposed Project. Implementation of sidewalk repair projects under this alternative would result in impacts on utilities and service systems that are comparatively less than those under the proposed Project with respect to being adequately served by existing and planned water infrastructure; not exceeding the future planned drainage capacity (as defined in the City General Plan) or the wastewater treatment requirements of the Los Angeles RWQCB; and not conflicting with solid waste policies and objectives in the City Solid Waste Management Policy Plan, Framework Element, or Source Reduction and Recycling Element. Impacts would be less than significant.

Considering that less sidewalk would be repaired under this alternative, the total annual water demand, wastewater generation, and waste generation would be less than under the proposed Project. Similar to the proposed Project, it is not anticipated that the demand for water under Alternative 1 would exceed existing water supply, and the wastewater generated would remain within capacity of existing treatment facilities. Similar to the proposed Project, it is anticipated that the waste infrastructure that would be required for this alternative would be addressed and planned for in subsequent iterations of the relevant planning documents, such as the SWIRP.

5.4.2.15 Energy

Under Alternative 1, while the nature of sidewalk repair construction activities would generally be similar to that of the proposed Project, no street tree removals or replacements would occur, and no operations activities described for the proposed Project would occur, as no street trees would be removed or replaced that would require monitoring or watering. With no street trees being removed, unlike the Project, this alternative would not indirectly increase electricity consumption

because of the urban heat island effect that can be exacerbated due to street tree removals. However, the benefits from more street trees being planted under the proposed Project for each street tree removed (at 2:1 or 3:1 replacement ratio) that would result in ongoing mitigation of the existing urban heat island effect would not be realized under this alternative.

Due to less sidewalk being repaired under this alternative than under the proposed Project, the related use of heavy-duty construction equipment, worker trips to and from construction sites, material delivery and disposal trips, and loading demolition debris into trucks, all of which lead to transportation fuel consumption, would also be less. Similar to the proposed Project, the City would use a fleet of fuel-efficient vehicles for all work, which would reduce the demand for transportation fuels. Construction activities would rely on diesel-powered generators to produce the electricity required to operate electrical equipment. Similar to the proposed Project, it is anticipated that the utilities would address electricity demands within their respective service territories, which are under the oversight of the California Public Utilities Commission, and plan for utility demand through their annual Energy Resource Recovery Account proceedings in which energy forecasts are refined. This alternative would not have a detrimental effect on local and regional energy supplies or requirements for additional capacity, nor would it impede a local utility's ability to meet the peak- and base-period demand for electricity and other forms of energy. Alternative 1 would not result in the wasteful, inefficient, or unnecessary consumption of energy. There would be a less-than-significant impact related to electricity and transportation fuel consumption. Impacts would be less than significant.

5.4.2.16 Wildfire

Implementation of sidewalk repair projects under Alternative 1 would not result in wildfire impacts that would be different from those under the proposed Project. Under this alternative, while the nature of sidewalk repair construction activities would generally be similar to that of the proposed Project except that no street tree removals or replacements would occur, no operations activities described for the proposed Project would occur, as no street trees would be removed or replaced that would require monitoring or watering. Some repairs would continue to occur in areas that are designated as Very High Fire Hazard Severity Zones. The work would be performed on concrete sidewalks, curbs, gutters, ramps, and other existing built-environment infrastructure. The materials involved are not flammable, and work would not be performed near flammable materials that would exacerbate wildfire risks. Compliance with existing laws, such as those in the LAMC, Fire Code Section 57, et seq., for construction sites on, adjacent to, or in the immediate vicinity of a Very High Fire Hazard Severity Zone would further minimize potential risks. Impacts would be less than significant.

5.4.3 Alternative 2. Ordinance to exclude sidewalk repairs and street tree removals within 23 feet of the nearest occupied space façade of a sensitive use (residential or commercial).

Under Alternative 2, which is intended to lessen or avoid significant noise impacts as a result of sidewalk repair activities, the proposed new ordinance would revise the way sidewalk repair projects are reviewed and approved for only those projects that are more than 23 feet from the nearest occupied façade of the closest sensitive receptor (commercial or residential use); sidewalk

repair projects that are within 23 feet of the nearest occupied façade of the closest sensitive receptor (commercial or residential) would continue to be evaluated individually on a case-by-case basis, as under existing conditions, to determine whether they can be exempt or require further environmental review under CEQA. No other changes related to the proposed new ordinance, the Street Tree Retention, Removal and Replacement Policy, or the mandatory PDFs are proposed; these would remain the same as under the proposed Project. Considering that there is more square footage of sidewalk to repair in the City than would be subject to ministerial approval under the Project (i.e., the ordinance provisions), it is anticipated that even with the occasional exclusion of specific sidewalk repair sites under this alternative, a comparable amount of sidewalk repairs would ultimately occur under this alternative each year, and cumulatively, because funds would be re-directed to those remaining sidewalk repair segments located at least 23 feet from the nearest occupied space façade of a sensitive use.

5.4.3.1 Aesthetics

Aesthetics impacts under Alternative 2 would be similar to those under the proposed Project, as exclusion of some projects (projects that would be within 23 feet of the nearest occupied façade of the closest sensitive receptor [commercial or residential use]) from the ordinance would not result in visual or aesthetics impacts Citywide that would be substantially different compared to the proposed Project. Similar to the proposed Project, Alternative 2 would not contribute to a loss of scenic vistas or a state scenic highway, or loss of focal views including natural views of topography, mountains, oceans, or man-made visual features. Temporary construction impacts from sidewalk repairs could affect the character of the local neighborhoods where the repairs would occur over 30 years of the program implementation period; however, these effects would be short term (generally fewer than 30 days at any given location) and would improve visual conditions over the long term.

In areas where street tree removal would be necessary at project locations that are at least 23 feet from the nearest occupied façade of the closest sensitive receptor (commercial or residential use), the effects on the character and quality of the neighborhood would be more perceptible and prominent. Temporary impacts on the City's urban forest and street tree canopy may occur because a new replacement street tree would require approximately 15 years to mature, on average (see Section 5.4.4.3, *Biological Resources*); however, in most cases, implementation of the revised street tree replacement policy would offset any long-term aesthetic impact, with removed street trees replaced at a 2:1 ratio for the first 10 years, a 3:1 ratio for years 11 through 21, and a 2:1 ratio for the remaining 9 years of Alternative 2 implementation. Similar to the proposed Project, over the long term or after 30 years, the City's overall visual landscape and the immediate surrounding area near an individual project would be improved, the City would not only be at net neutral for street tree canopy but there would be a net gain in tree canopy Citywide beginning in year 30, and shade would be reestablished to the level at the start of the implementation of Alternative 2. An alteration of HCM street trees for activities under Alternative 2 would be considered a significant impact in areas where the SOI's standards cannot feasibly be implemented. Similar to Scenario 3 projects, Alternative 2 would result in a significant impact on aesthetic or visual character in instances where the integrity of a cultural resource cannot be maintained, including when the aesthetic integrity of a known cultural resource is a contributing factor to a Historical Preservation Overlay Zone; or within an area of high sensitivity with respect to cultural resources; or in an area with known archaeological, paleontological, or tribal artifacts; or in an area with a designated HCM street tree. Impacts would be significant.

5.4.3.2 Air Quality

Exclusion of sidewalk repair projects that are within 23 feet of the nearest occupied façade of the closest sensitive receptor (commercial or residential use) from the ordinance proposed under Alternative 2, would not result in air quality impacts that would be different from those under the proposed Project. Under this alternative, the nature of construction activities and operations remain unchanged from the proposed Project; the total amount of sidewalk repairs and street tree removal/replacements under Alternative 2 would remain comparable to the Project, even with the exclusion of some projects, and, as under the Project, construction and operation would occur simultaneously at various times and locations (i.e., sidewalk repair/street tree removal and replacement street tree watering). Accordingly, similar to the proposed Project, Alternative 2 would not exceed regional or localized regional significance thresholds established by SCAQMD. Construction would be consistent with the objectives and policies of the General Plan and General Plan Framework, as construction activities would result in accommodating the mobility needs of people with disabilities, especially those with mobility disabilities, and would make all sidewalks compliant with applicable accessibility requirements. Given the brief duration of activities at each individual project site, the limited intensity of construction equipment use due to site constraints, and considering that operations activities would not introduce any new substantial stationary or mobile sources of TAC emissions in the City, this alternative would also not pose carcinogenic risks to nearby sensitive receptors. Therefore, similar to the proposed Project, Alternative 2 would be consistent with applicable SCAQMD and SCAG policies and would not expose sensitive receptors to substantial TAC concentrations. Impacts would be less than significant.

5.4.3.3 Biological Resources

Exclusion of sidewalk repair projects that are within 23 feet of the nearest occupied façade of the closest sensitive receptor (commercial or residential use) from the ordinance proposed under Alternative 2 would not result in biological resources impacts that would be different from those under the proposed Project. Under this alternative, the nature of construction activities, operations, and location of individual sidewalk repair projects remain unchanged from the proposed Project and, as under the proposed Project, construction and operation would occur simultaneously at various times and locations (i.e., sidewalk repair/street tree removal and replacement street tree watering). Alternative 2 would be implemented in a primarily urban landscape where there is little to no suitable habitat for any wildlife species, besides the canopy associated with street trees. No construction would occur in Section 404 regulated water bodies. Upon completion of construction activities, minor maintenance activities, such as street tree inspections and watering, would occur. Although sensitive wildlife species would be affected through the removal of street trees and foraging habitat, such species are adapted to living in a heavily developed and disturbed urban setting. Construction noise is common throughout the City and unlikely to harm or harass such species. Construction impacts such as increased noise and light may have a significant impact on sensitive and resident wildlife species that occur within the sidewalk repair area; however, implementation of identified PDFs (PDF-BIO-1 through PDF-BIO-6) would ensure that any impact associated with habitat interference would remain less than significant by providing detailed guidance on how to comply with the MBTA, replacing removed street trees promptly, avoiding any destruction of active nests, and complying with the California Fish and Game Code and other applicable requirements. Compliance with and implementation of the PDFs would ensure that the species' normal behavior and chances for long-term survival would not be adversely affected by construction activities.

Like the proposed Project, Alternative 2 would not reduce, but would rather increase, habitat over time. With implementation of 2:1 and 3:1 street tree ratios over the 30-year implementation period, nesting habitat would increase and removed street trees would be replaced within 1 year. The replacement ratios would result in a net gain in the total number of street trees and acres of street tree canopy, which would provide additional nesting habitat for species protected under the MBTA. Impacts would be less than significant.

5.4.3.4 Cultural Resources

Exclusion of sidewalk repair projects that are within 23 feet of the nearest occupied façade of the closest sensitive receptor (commercial or residential use) from the ordinance proposed under Alternative 2 would not result in cultural resources impacts that would be different from those under the proposed Project. Under this alternative, the nature of construction activities, operations, and location of individual sidewalk repair projects remain unchanged from the proposed Project and, as under the proposed Project, construction and operation would occur simultaneously at various times and locations (i.e., sidewalk repair/street tree removal and replacement street tree watering). As under the proposed Project, under PDF-CUL-1, sites will be assessed for historical significance prior to the approval of any individual sidewalk repair and the existing Cultural Heritage Ordinance would still apply to HCM resources under Alternative 2. As discussed in Section 3.4, construction activities could result in the demolition of sidewalks, ramps, curbs, traffic signs, gutters, or other similar sidewalk-related features that are of historical significance. Similarly, construction could result in impacts on archaeological resources (e.g., uncover buried artifacts or features) and paleontological resources. Implementation of PDFs (PDF-CUL-1 through PDF-CUL-4) would require an assessment of historical significance, implementation of repairs and replacements in accordance with the SOI's standards, preparation of an Archaeological Treatment Plan, and/or preparation of a Paleontological Management Treatment Plan, as necessary. Although these PDFs would reduce and minimize impacts, when the SOI's standards cannot be followed a substantial material change in the significance or integrity of a historical or archaeological resource occurs, even after following the SOI's standards, and significant impacts would result. Impacts associated with the disturbance of human remains would be less than significant because compliance with the existing laws and regulations for appropriate handling of any human remains that are encountered would occur.

5.4.3.5 Geology and Soils

Exclusion of sidewalk repair projects that are within 23 feet of the nearest occupied façade of the closest sensitive receptor (commercial or residential use) from the ordinance proposed under Alternative 2 would not result in impacts on geology and soils that are different from those under the proposed Project. Under this alternative, the nature of construction activities, operations, and location of individual sidewalk repair projects remain unchanged from the proposed Project and, as under the proposed Project, construction and operation would occur simultaneously at various times and locations (i.e., sidewalk repair/street tree removal and replacement street tree watering). Construction activities would be too shallow to cause significant geologic events (e.g., fault rupture, landslides, seismic ground shaking, liquefaction) or exacerbate geologic conditions. Geologic conditions in the area would remain unchanged as a result of the Sidewalk Repair Program. Similar to the proposed Project, landslide- and liquefaction-prone areas as well as areas with collapsible soils could expose workers to geologic hazards under this alternative. Implementation of PDF-GEO-1 (shoring plan) would minimize this impact in areas where excavation would be greater than 5 feet

deep, as required per the Greenbook. Implementation of erosion and sediment control BMPs would prevent substantial soil erosion and sedimentation. In addition, construction activities would occur only in areas where sidewalks currently exist, not in areas where erosion could destabilize nearby structures. Construction activities would not create a geologic hazard by causing or accelerating instability related to erosion. Impacts would be less than significant.

5.4.3.6 Greenhouse Gas Emissions

Exclusion of sidewalk repair projects that are within 23 feet of the nearest occupied façade of the closest sensitive receptor (commercial or residential use) from the ordinance proposed under Alternative 2 would not result in GHG impacts that would be different from those under the proposed Project. Under this alternative, the nature of construction activities and operations remain unchanged from the proposed Project and street trees would be removed/replaced at the same schedule as the Project; the total amount of sidewalk repairs and street tree removal/replacements under Alternative 2 would remain comparable to those of the Project even with the exclusion of some projects, and would occur over 30 years, and as under the Project, with construction and operation occurring simultaneously at various times and locations (i.e., sidewalk repair/street tree removal and replacement street tree watering). Thus, aggregate GHG emissions associated with all activities under the alternative (construction activities, operational maintenance activities, and changes in carbon sequestration over the 30-year period) would be similar to under the Project. Accordingly, similar to the proposed Project, annual GHG emissions under Alternative 2 would be below 3,000 metric tons of carbon dioxide equivalent. Impacts would be less than significant.

5.4.3.7 Hazards and Hazardous Materials

Exclusion of sidewalk repair projects that are within 23 feet of the nearest occupied façade of the closest sensitive receptor (commercial or residential use) from the ordinance proposed under Alternative 2 would not result in impacts related to hazards and hazardous materials that are different from those under the proposed Project. Under this alternative, the nature of construction activities, operations, and location of individual sidewalk repair projects remain unchanged from the proposed Project and, as under the proposed Project, construction and operation would occur simultaneously at various times and locations (i.e., sidewalk repair/street tree removal and replacement street tree watering). The construction activities associated with the proposed Project would involve the routine transport, use, and disposal of hazardous materials, such as solvents, paints, oils, and grease—materials that are typically used in construction projects. Such transport, use, and disposal would be in compliance with applicable regulations (e.g., the Resource Conservation and Recovery Act, Occupational Safety and Health Administration regulations, Department of Transportation regulations, the California Labor Code, and the California Code of Regulations). Any hazardous materials used would generally be in small amounts and any spills that may occur would be contained and cleaned up according to the Material Safety Data Sheet/Globally Harmonized System in the appropriate manner. During Project excavation, contaminated groundwater and/or contaminated soil may occasionally be encountered, which could release hazardous materials into the environment, expose workers and nearby receptors to hazardous emissions, or expose contaminated groundwater. Similar to the proposed Project, implementation of PDF-HAZ-2 through PDF-HAZ 4 would minimize exposure to hazardous materials and require proper handling and oversight (per state regulations and BOE standards). Impacts would be less than significant.

5.4.3.8 Hydrology and Water Quality

Exclusion of sidewalk repair projects that are within 23 feet of the nearest occupied façade of the closest sensitive receptor (commercial or residential use) from the ordinance proposed under Alternative 2 would not result in impacts on hydrology and water quality that are different from those under the proposed Project. Under this alternative, the nature of construction activities, operations, and location of individual sidewalk repair projects remain unchanged from the proposed Project and, as under the proposed Project, construction and operation would occur simultaneously at various times and locations (i.e., sidewalk repair/street tree removal and replacement street tree watering). Alternative 2 would not affect the City's ability to implement or enforce its goals or policies or otherwise be inconsistent with regulatory requirements related to the minimization of water quality impacts. Construction activities would improve existing sidewalk and not introduce new impervious surfaces; as such, they would not result in a permanent adverse change in the movement of surface water and overall drainage patterns would be maintained. Any changes to stormwater flows into the stormwater system would be temporary during construction only. No direct groundwater withdrawal would occur, and the alternative would not obstruct potential groundwater recharge. Construction would comply with the minimum construction site BMP requirements of the MS4 permit for erosion, sediment, non-stormwater management, and waste management, and the BMPs would be implemented during construction activities to reduce the potential for chemical contaminants to affect water quality. The temporary reduction in street tree canopy from the replacement of mature street trees with younger and smaller street trees could alter street tree rainfall interception, which may temporarily increase surface runoff. However, similar to the Project, over the 30-year implementation period for this alternative, there will be a net gain in the canopy. The planted areas would be adequately watered during the establishment period, without erosion that would be detrimental to plantings.

Like under the Project, some sidewalk repairs could be within 100- and 500-year floodplains, which are potentially subject to flooding during storm events; however, flooding conditions would not be expected to change compared with existing conditions. Construction activities would not affect the overall flood zone or result in additional flooding because no new structures would be added to existing sidewalks that could redirect or exacerbate existing floodflows. Impacts would be less than significant.

5.4.3.9 Land Use

Exclusion of sidewalk repair projects that are within 23 feet of the nearest occupied façade of the closest sensitive receptor (commercial or residential use) from the ordinance proposed under Alternative 2 would not result in impacts on land use that are different from those under the proposed Project. Under this alternative, the nature of construction activities, operations, and location of individual sidewalk repair projects remain unchanged from the proposed Project and, as under the proposed Project, construction and operation would occur simultaneously at various times and locations (i.e., sidewalk repair/street tree removal and replacement street tree watering). Like under the proposed Project, implementation of projects under Alternative 2 would generally be within the public ROW and would not change or affect the adjacent and surrounding land uses. Similar to the Project, Alternative 2 would include the Revised Street Tree Retention, Removal and Replacement Policy, which would improve communities and enhance and improve sidewalks, providing better accessibility of all pedestrians. Consistent with the applicable objectives and policies of the General Plan and Framework Element, street tree activities under this alternative would help accommodate the needs of people with disabilities as well as the need for high-quality,

safe pedestrian access on all sidewalks by ensuring that sidewalks would be in compliance with applicable accessibility requirements. Alternative 2 would be consistent with the applicable sidewalk, infrastructure, mobility, sustainability, and street tree policies identified in Mobility Plan 2035, an element of the General Plan and the Framework Element. Implementation of this alternative would not conflict with existing land use plans, policies, or regulations of agencies with jurisdiction over the Project area. Impacts would be less than significant.

5.4.3.10 Noise

Under this alternative, the nature of construction activities and operations of individual sidewalk repair projects remain unchanged from the proposed Project and, as under the proposed Project, construction and operation would occur simultaneously at various times and locations (i.e., sidewalk repair/street tree removal and replacement street tree watering). However, exclusion of sidewalk repair projects that are within 23 feet of the nearest occupied façade of the closest sensitive receptor (commercial or residential use) from the ordinance proposed under Alternative 2 would avoid the significant noise impact and temporary significant vibration impact that would result under the proposed Project in instances where a 10-foot distance for commercial sensitive uses or a 20-foot distance for residential sensitive uses cannot be maintained from the construction noise source, and where the distance from the construction vibration source to the building foundation of the nearest structure is fewer than 8 feet or where the distance to the nearest occupied space of a sensitive use is fewer than 23 feet. With the exclusion of projects that are within 23 feet of the nearest occupied façade of the closest sensitive receptor (commercial or residential use), the calculated interior sound level would not exceed the Project-specific interior threshold of 85 A-weighted decibels, equivalent noise level (8 hours), through the various phases of construction activities under Alternative 2. In addition, construction would be short term in duration, and no hearing damage would occur. Construction noise BMPs would be implemented, per PDF-NOI-2, to minimize noise impacts from construction activities. Similarly, vibration impacts from construction activities under Alternative 2 would be less than significant. Similar to the proposed Project, Alternative 2 would not result in any permanent change to noise levels; it would not expose people residing or working in the project site area to, or otherwise generate, excessive noise levels and this impact would be less than significant. Impacts would be less than significant.

5.4.3.11 Public Services

Exclusion of sidewalk repair projects that are within 23 feet of the nearest occupied façade of the closest sensitive receptor (commercial or residential use) from the ordinance proposed under Alternative 2 would not result in impacts on public services that are different from those under the proposed Project. Under this alternative, the nature of construction activities, operations, and location of individual sidewalk repair projects remain unchanged from the proposed Project and, as under the proposed Project, construction and operation would occur simultaneously at various times and locations (i.e., sidewalk repair/street tree removal and replacement street tree watering). Demand for additional public services is usually created when there is a net increase in population in an area as a result of a project. Alternative 2 projects would not result in an increase in population because the construction crews employed to repair and maintain the sidewalks or remove and replace the street trees would not require relocated housing during construction. The sidewalks being repaired are existing sidewalks that are already serving the existing population, and there is no evidence that ensuring the accessibility of the sidewalks under this alternative would lead to increased population growth. Construction activities for sidewalk repairs and street tree

removal/replacement have the potential to temporarily increase the demand on police services and affect their response times due to temporary lane and road closures, which may also delay emergency responders. However, the lane closures would be infrequent and limited to small portions of streets, and would not result in mobility conditions that would be substantially different from existing conditions on roadways. Project construction would also comply with requirements and policies relating to fire safety practices, and PDF-TR-1 that includes compliance with the current edition of the WATCH manual. Therefore, there is no need for additional fire protection services apart from the existing level of service available within the City. Construction staging is also not expected to inhibit access to police or fire protection facilities. No other element of the continuing construction activities or operations (such as watering and inspecting the street trees) has the potential to increase the population, nor would it require the expansion of existing or construction of new fire, police, school, library, or park facilities. Impacts on public services would be less than significant.

5.4.3.12 Transportation

Exclusion of sidewalk repair projects that are within 23 feet of the nearest occupied façade of the closest sensitive receptor (commercial or residential use) from the ordinance proposed under Alternative 2 would not result in transportation impacts that would be different from those under the proposed Project. Under this alternative, the nature of construction activities, operations, and location of individual sidewalk repair projects remain unchanged from the proposed Project and, as under the proposed Project, construction and operation would occur simultaneously at various times and locations (i.e., sidewalk repair/street tree removal and replacement street tree watering), and overall approximately the same amount of sidewalk repairs and street tree removal/replacement would occur as under the proposed Project. Accordingly, similar to the proposed Project, the maximum estimated daily construction trip generation at any single repair site would remain at 76 daily trips (with up to approximately half of that total expected during peak hours) and Citywide trips would be similar to those of the Project over the 30 years. As construction activities would be geographically widely distributed throughout the City, a relatively low number of trips would be generated at any individual construction site, and the effects of lane closures and parking restrictions would be minimized through compliance with LAMC Section 62.61 and the WATCH manual, as well as through the use of flagpersons, in-street construction impacts related to temporary traffic constraints would be less than significant. The temporary traffic impacts would not be substantial during construction, which may last up to 30 days at any construction site.

The likely impacts on bus stops would be limited to the maximum 30-day construction period and would be coordinated with the appropriate transit providers to ensure that effects on bus riders would be minimized. In addition, due to the short-term duration of loss of access related to driveway obstructions, parking spaces, and disruptions to pedestrian travel and coordination of construction activities with affected property owners and occupants, impacts related to potential temporary loss of access would be less than significant. Activities under this alternative involve rehabilitation, maintenance, replacement, safety, and repair projects designed to improve the condition of existing transportation assets and would not add motor vehicle capacity; as such, Alternative 2 is not likely to lead to substantial or measurable increases in vehicle travel. This alternative, like the proposed Project, does not require further assessment for residential street impacts because the operational activities from the Project would not generate a net increase of 250 or more daily vehicle trips. Impacts would be less than significant.

5.4.3.13 Tribal Cultural Resources

Exclusion of sidewalk repair projects that are within 23 feet of the nearest occupied façade of the closest sensitive receptor (commercial or residential use) from the ordinance proposed under Alternative 2 would not result in TCR impacts that would be different from those under the proposed Project. Under this alternative, the nature of construction activities, operations, and location of individual sidewalk repair projects remain unchanged from the proposed Project and, as under the proposed Project, construction and operation would occur simultaneously at various times and locations (i.e., sidewalk repair/street tree removal and replacement street tree watering). Construction activities associated with trenching and deeper excavations, as opposed to more surficial disturbances, have the potential to uncover or disturb TCRs. Impacts on TCRs would be less than significant under Scenarios 1 and 2 wherein it is unlikely that native fill will be involved during construction and utility relocation; similar to Scenario 3 projects under the proposed Project, Alternative 2 would result in a significant impact on TCRs where, after the assessment of TCRs in PDF-CUL-1 and despite the implementation under PDF-CUL-2 of the SOI's Standards for the Treatment of Historic Properties and PDF-CUL-3 of archaeological treatment plans, the integrity and significance of TCRs cannot be maintained. Impacts would be significant.

5.4.3.14 Utilities and Service Systems

Exclusion of sidewalk repair projects that are within 23 feet of the nearest occupied façade of the closest sensitive receptor (commercial or residential use) from the ordinance proposed under Alternative 2 would not result in utilities and service systems impacts that would be different from those under the proposed Project. Under this alternative, the nature of construction activities and operations remain unchanged from the proposed Project; the total amount of sidewalk repairs and street tree removal/replacements under Alternative 2 would remain comparable to the Project, even with the exclusion of some projects. Accordingly, similar to the proposed Project, Alternative 2 would result in less-than-significant impacts with respect to water demand not exceeding the existing and planned water supply; being adequately served by existing and planned water and waste infrastructure; not exceeding the future planned drainage capacity (as defined in the City General Plan) or the wastewater treatment requirements of the Los Angeles RWQCB; and not conflicting with solid waste policies and objectives in the City Solid Waste Management Policy Plan, Framework Element, or Source Reduction and Recycling Element. Impacts would be less than significant.

5.4.3.15 Energy

Exclusion of sidewalk repair projects that are within 23 feet of the nearest occupied façade of the closest sensitive receptor (commercial or residential use) from the ordinance proposed under Alternative 2 would not result in energy impacts that would be different from those under the proposed Project. Under this alternative, the nature of construction activities, operations, and location of individual sidewalk repair projects remain unchanged from the proposed Project and, as under the proposed Project, construction and operation would occur simultaneously at various times and locations (i.e., sidewalk repair/street tree removal and replacement street tree watering).

As under the Project, the removal of street trees under this alternative could indirectly increase electricity consumption because of the urban heat island effect. However, this alternative would plant up to 30,405 street trees, resulting in an overall net gain of 128 acres in the street tree canopy beginning in year 30 and continuing beyond year 30, which would offset the temporary urban heat

island effects. Construction activities would rely on diesel-powered generators to produce the electricity required to operate electrical equipment. Similar to the proposed Project, it is anticipated that the utilities would address electricity demands within their respective service territories, which are under the oversight of the California Public Utilities Commission, and plan for utility demand through their annual Energy Resource Recovery Account proceedings in which energy forecasts are refined. Alternative 2 would not have a detrimental effect on local and regional energy supplies or requirements for additional capacity, nor would it impede a local utility's ability to meet the peak- and base-period demand for electricity and other forms of energy.

Similar to the Project, during construction under this alternative, transportation fuel would be required and consumed at a rate of approximately 148,705 gallons per year during peak activity, or approximately 3.3 million gallons (418,456 BTUs) over the 30-year lifetime of the alternative. Vehicles used for street tree watering and inspections during post-construction operations would result in the consumption of approximately 10,623 gallons of transportation fuel per year, or approximately 318,690 gallons over the 30-year period. The City would use a fleet of fuel-efficient vehicles for all work that would be required under this alternative, which would reduce the demand for transportation fuels. Therefore, Alternative 2 would not result in a wasteful, inefficient, or unnecessary usage of energy; result in a substantial increase in energy demand that would affect local or regional energy supplies; or require additional capacity or infrastructure to meet an increased demand. There would be a less-than-significant impact related to electricity and transportation fuel consumption. Impacts would be less than significant.

5.4.3.16 Wildfire

Exclusion of sidewalk repair projects that are within 23 feet of the nearest occupied façade of the closest sensitive receptor (commercial or residential use) from the ordinance proposed under Alternative 2 would not result in wildfire impacts that would be different from those under the proposed Project. Under this alternative, the nature of construction activities, operations, and location of individual sidewalk repair projects remain unchanged from the proposed Project; wildfire impacts would be similar to those under the proposed Project.

Some repairs would continue to occur in areas that are designated as Very High Fire Hazard Severity Zones. The work would be performed on concrete sidewalks, curbs, gutters, ramps, and other existing built-environment infrastructure. The materials involved are not flammable, and work would not be performed near flammable materials that would exacerbate wildfire risks. Compliance with existing laws, such as those in the LAMC, Fire Code Section 57, et seq., for construction sites on, adjacent to, or in the immediate vicinity of a Very High Fire Hazard Severity Zone would further minimize potential risks. Impacts would be less than significant.

5.4.4 Alternative 3. Ordinance will exclude sidewalk repair projects that have the potential to affect known historic, tribal cultural, unique archaeological, or unique paleontological resources; such projects would proceed as discretionary projects under existing codes and policies.

Under Alternative 3, sidewalk repair projects that may result in significant adverse impacts on known historic, tribal cultural, unique archaeological, or unique paleontological resources, as these terms are defined by CEQA, would continue to be reviewed and approved on a case-by-case basis under existing codes and policies, and would require individual CEQA review and would not be able to rely on this EIR for CEQA compliance. Approval of sidewalk repair projects failing within these parameters would proceed only on a case-by-case basis of discretionary approval consistent with existing practices, as opposed to a streamlined discretionary approval process as proposed under the Project. These projects will, however, comply with the Revised 2015 Street Tree Removal Permit and Tree Replacement Condition Policies for any required street tree removals and replacements. Considering that there is more square footage of sidewalk to repair in the City than would be subject to ministerial approval under the Project (i.e., the ordinance provisions), it is anticipated that even with the occasional exclusion of specific sidewalk repair sites under this alternative, a comparable amount of sidewalk repairs would ultimately occur under this alternative each year, and cumulatively, because funds would be re-directed to those remaining sidewalk repair segments that lack potential to substantially and adversely affect known historic, tribal cultural, unique archaeological, or unique paleontological resources.

5.4.4.1 Aesthetics

Similar to the proposed Project, Alternative 3 would not contribute to a loss of scenic vistas or a state scenic highway, or loss of focal views including natural views of topography, mountains, oceans, or man-made visual features. Temporary construction impacts from sidewalk repairs could affect the character of the local neighborhoods where the repairs would occur over 30 years of the program implementation period; however, these effects would be short term (generally fewer than 30 days at any given location) and would improve visual conditions over the long term.

In areas where street tree removal would be necessary, the effects on the character and quality of the neighborhood would be more perceptible and prominent. Temporary impacts on the City's urban forest and street tree canopy may occur because a new replacement street tree would require approximately 15 years to mature, on average (see Section 5.4.5.3, *Biological Resources*); however, in most cases, implementation of the revised street tree replacement policy would offset any long-term aesthetic impact, with removed street trees replaced at a 2:1 ratio for the first 10 years, a 3:1 ratio for years 11 through 21, and a 2:1 ratio for the remaining 9 years of Alternative 3 implementation. Similar to the proposed Project, over the long term or after 30 years, the City's overall visual landscape and the immediate surrounding area near an individual project would be improved, the City would not only be at net neutral for street tree canopy but there would be a net gain in tree canopy Citywide beginning in year 30, and shade would be reestablished to the level at the start of the implementation of Alternative 3.

Because Alternative 3 would not include individual projects that have the potential to affect known historic, tribal cultural, unique archaeological, or unique paleontological resources, an alteration of HCM street trees would not result from activities under Alternative 3 with the potential for significant impacts in areas where the SOI's standards cannot feasibly be implemented. Unlike Scenario 3 under the proposed Project, Alternative 3 would not result in a significant impact on aesthetic or visual character, as it would exclude projects that have the potential for such impacts including in instances where the integrity of a cultural resource cannot be maintained, including when the aesthetic integrity of a known cultural resource is a contributing factor to a Historical Preservation Overlay Zone; or within an area of high sensitivity with respect to cultural resources; or in an area with known archaeological, paleontological, or tribal artifacts; or in an area with a designated HCM street tree. Impacts would be significant.

5.4.4.2 Air Quality

Exclusion of sidewalk repair projects that have the potential to affect known historic, tribal cultural, unique archaeological, or unique paleontological resources from the ordinance proposed under Alternative 3 would not result in impacts on air quality that would be different from those under the proposed Project. Under this alternative, the nature of construction activities and operations remain unchanged from the proposed Project; the total amount of sidewalk repairs and street tree removal/replacements under Alternative 3 would be comparable to the Project, even with the exclusion of some projects, and as under the Project, construction and operation would occur simultaneously at various times and locations (i.e., sidewalk repair/street tree removal and replacement street tree watering). Accordingly, similar to the proposed Project, Alternative 3 would not exceed regional or localized regional significance thresholds established by SCAQMD. Construction would be consistent with the objectives and policies of the General Plan and General Plan Framework as construction activities would result in accommodating the mobility needs of people with disabilities, especially those with mobility disabilities, and would make all sidewalks compliant with applicable accessibility requirements. Given the brief duration of activities at each individual project site, the limited intensity of construction equipment use due to site constraints, and considering that operations activities would not introduce any new substantial stationary or mobile sources of TAC emissions in the City, this alternative would also not pose carcinogenic risks to nearby sensitive receptors. Therefore, similar to the proposed Project, Alternative 3 would be consistent with applicable SCAQMD and SCAG policies and would not expose sensitive receptors to substantial TAC concentrations. Impacts would be less than significant.

5.4.4.3 Biological Resources

Exclusion of sidewalk repair projects that have the potential to affect known historic, tribal cultural, unique archaeological, or unique paleontological resources from the ordinance proposed under Alternative 3 would not result in biological resources impacts that would be different from those under the proposed Project. Under this alternative, the nature of construction activities and operations remain unchanged from the proposed Project.

Alternative 3 would be implemented in a primarily urban landscape where there is little to no suitable habitat for any wildlife species, besides the canopy associated with street trees. No construction would occur in Section 404 regulated water bodies. Upon completion of construction activities, minor maintenance activities, such as street tree inspections and watering, would occur. Although sensitive wildlife species would be affected through the removal of street trees and foraging habitat, such species are adapted to living in a heavily developed and disturbed urban

setting. Construction noise is common throughout the City and unlikely to harm or harass such species. Construction impacts such as increased noise and light may have a significant impact on sensitive and resident wildlife species that occur within the sidewalk repair area; however, implementation of identified PDFs (PDF-BIO-1 through PDF-BIO-6) would ensure that any impact associated with habitat interference would remain less than significant by providing detailed guidance on how to comply with the MBTA, replacing removed street trees promptly, avoiding any destruction of active nests, and complying with the California Fish and Game Code and other applicable requirements. Compliance with and implementation of the PDFs would ensure that the species' normal behavior and chances for long-term survival would not be adversely affected by construction activities.

Like the proposed Project, Alternative 3 would not reduce, but would rather increase, habitat over time. With implementation of 2:1 and 3:1 street tree ratios over the 30-year implementation period, nesting habitat would increase and removed street trees would be replaced within 1 year. The replacement ratios would result in a net gain in the total number of street trees and acres of street tree canopy, which would provide additional nesting habitat for species protected under the MBTA. Impacts would be less than significant.

5.4.4.4 Cultural Resources

Under this alternative, the nature of construction activities and operations of individual sidewalk repair projects remain unchanged from the proposed Project and, as under the proposed Project, construction and operation would occur simultaneously at various times and locations (i.e., sidewalk repair/street tree removal and replacement street tree watering). However, sidewalk repair projects that are located in areas where they have the potential to affect known historic, tribal cultural, unique archaeological, or unique paleontological resources would be excluded from the ordinance proposed under Alternative 3. In accordance with PDF-CUL-1, sites will be assessed for historical significance prior to the approval of any individual sidewalk repair to determine whether a substantial adverse change would occur to the significance of a known historic, tribal cultural, unique archaeological, and/or unique paleontological resource. Under Alternative 3, projects that may cause a substantial adverse change to known historic, tribal cultural, unique archaeological, and/or unique paleontological resources will be excluded from the ordinance and, therefore, unlike the proposed Project, significant impacts on cultural resources would not occur under Alternative 3.

5.4.4.5 Geology and Soils

Exclusion of sidewalk repair projects that have the potential to affect known historic, tribal cultural, unique archaeological, or unique paleontological resources from the ordinance proposed under Alternative 3 would not result in impacts on geology and soils that would be different from those under the proposed Project. Under this alternative, the nature of construction activities and operations remain unchanged from the proposed Project. Construction activities would be too shallow to cause significant geologic events (e.g., fault rupture, landslides, seismic ground shaking, liquefaction) or exacerbate geologic conditions. Geologic conditions in the area would remain unchanged as a result of the Sidewalk Repair Program. Similar to the proposed Project, landslide- and liquefaction-prone areas as well as areas with collapsible soils could expose workers to geologic hazards under this alternative. Implementation of PDF-GEO-1 (shoring plan) would minimize this impact in areas where excavation would be greater than 5 feet deep, as required per the Greenbook. Implementation of erosion and sediment control BMPs would prevent substantial soil erosion and sedimentation. In addition, construction activities would occur only in areas where sidewalks

currently exist, not in areas where erosion could destabilize nearby structures. Construction activities would not create a geologic hazard by causing or accelerating instability related to erosion. Impacts would be less than significant.

5.4.4.6 Greenhouse Gas Emissions

Exclusion of sidewalk repair projects that have the potential to affect known historic, tribal cultural, unique archaeological, or unique paleontological resources from the ordinance proposed under Alternative 3 would not result in GHG impacts that are different from those under the proposed Project. Under this alternative, the nature of construction activities and operations remain unchanged from the proposed Project and street trees would be removed/replaced at the same schedule as the Project; the total amount of sidewalk repairs and street tree removal/replacements under Alternative 3 would remain comparable to the Project even with the exclusion of some projects and would occur over 30 years and, as under the Project, construction and operation would occur simultaneously at various times and locations (i.e., sidewalk repair/street tree removal and replacement street tree watering). Thus, aggregate GHG emissions associated with all activities under the alternative (construction activities, operational maintenance activities, and changes in carbon sequestration over the 30-year period) would be similar to under the Project. Accordingly, similar to the proposed Project, annual GHG emissions under Alternative 3 would be below 3,000 metric tons of carbon dioxide equivalent. Impacts would be less than significant.

5.4.4.7 Hazards and Hazardous Materials

Exclusion of sidewalk repair projects that have the potential to affect known historic, tribal cultural, unique archaeological, or unique paleontological resources from the ordinance proposed under Alternative 3 would not result in impacts on land use that are different from those under the proposed Project. Under this alternative, the nature of construction activities and operations remain unchanged from the proposed Project. The construction activities associated with the proposed Project would involve the routine transport, use, and disposal of hazardous materials, such as solvents, paints, oils, and grease—materials that are typically used in construction projects. Such transport, use, and disposal would be in compliance with applicable regulations (e.g., the Resource Conservation and Recovery Act, Occupational Safety and Health Administration regulations, Department of Transportation regulations, the California Labor Code, and the California Code of Regulations). Any hazardous materials used would generally be in small amounts and any spills that may occur would be contained and cleaned up according to the Material Safety Data Sheet/Globally Harmonized System in the appropriate manner. During Project excavation, contaminated groundwater and/or contaminated soil may occasionally be encountered, which could release hazardous materials into the environment, expose workers and nearby receptors to hazardous emissions, or expose contaminated groundwater. Similar to the proposed Project, implementation of PDF-HAZ-2 through PDF-HAZ 4 would minimize exposure to hazardous materials and require proper handling and oversight (per state regulations and BOE standards). Impacts would be less than significant.

5.4.4.8 Hydrology and Water Quality

Exclusion of sidewalk repair projects that have the potential to affect known historic, tribal cultural, unique archaeological, or unique paleontological resources from the ordinance proposed under Alternative 3 would not result in impacts on land use that are different from those under the proposed Project. Under this alternative, the nature of construction activities and operations remain

unchanged from the proposed Project. Alternative 3 would not affect the City's ability to implement or enforce its goals or policies or otherwise be inconsistent with regulatory requirements related to the minimization of water quality impacts. Construction activities would improve existing sidewalk and not introduce new impervious surfaces; as such, they would not result in a permanent adverse change in the movement of surface water and overall drainage patterns would be maintained. Any changes to stormwater flows into the stormwater system would be temporary during construction only. No direct groundwater withdrawal would occur, and the alternative would not obstruct potential groundwater recharge. Construction would comply with the minimum construction site BMP requirements of the MS4 permit for erosion, sediment, non-stormwater management, and waste management, and the BMPs would be implemented during construction activities to reduce the potential for chemical contaminants to affect water quality. The temporary reduction in street tree canopy from the replacement of mature street trees with younger and smaller street trees could alter street tree rainfall interception, which may temporarily increase surface runoff. However, similar to the Project, over the 30-year implementation period for this alternative, there will be a net gain in the canopy. The planted areas would be adequately watered during the establishment period, without erosion that would be detrimental to plantings.

Like under the Project, some sidewalk repairs could be within 100- and 500-year floodplains, which are potentially subject to flooding during storm events; however, flooding conditions would not be expected to change compared with existing conditions. Construction activities would not affect the overall flood zone or result in additional flooding because no new structures would be added to existing sidewalks that could redirect or exacerbate existing floodflows. Impacts would be less than significant.

5.4.4.9 Land Use

Exclusion of sidewalk repair projects that have the potential to affect known historic, tribal cultural, unique archaeological, or unique paleontological resources from the ordinance proposed under Alternative 3 would not result in impacts on land use that are different from those under the proposed Project. Under this alternative, the nature of construction activities and operations remain unchanged from the proposed Project. Like under the proposed Project, implementation of projects under Alternative 3 would generally be within the public ROW and would not change or affect the adjacent and surrounding land uses. Similar to the Project, Alternative 3 would include the Revised Street Tree Retention, Removal and Replacement Policy, which would improve communities and enhance and improve sidewalks, providing better accessibility of all pedestrians. Consistent with the applicable objectives and policies of the General Plan and Framework Element, street tree activities under this alternative would help accommodate the needs of people with disabilities as well as the need for high-quality, safe pedestrian access on all sidewalks by ensuring that sidewalks would be in compliance with applicable accessibility requirements. Alternative 3 would be consistent with the applicable sidewalk, infrastructure, mobility, sustainability, and street tree policies identified in Mobility Plan 2035, an element of the General Plan and the Framework Element. Implementation of this alternative would not conflict with existing land use plans, policies, or regulations of agencies with jurisdiction over the Project area. Impacts would be less than significant.

5.4.4.10 Noise

Exclusion of sidewalk repair projects that have the potential to affect known historic, tribal cultural, unique archaeological, or unique paleontological resources from the ordinance proposed under Alternative 3 would not result in noise impacts that are different from those under the proposed

Project. Under this alternative, the nature of construction activities, operations, and location of individual sidewalk repair projects remain unchanged from the proposed Project and, as under the proposed Project, construction and operation would occur simultaneously at various times and locations (i.e., sidewalk repair/street tree removal and replacement street tree watering). Similar to the proposed Project, construction activities under this alternative would result in a significant noise impact if a 10-foot distance for commercial sensitive uses or a 20-foot distance for residential sensitive uses cannot be maintained from the construction noise source. In most cases, the calculated interior sound level would not exceed the Project-specific interior threshold of 85 A-weighted decibels, equivalent noise level (8 hours), through the various phases of construction activities. In addition, construction would be short term in duration, and no hearing damage would occur. However, some individual sidewalk projects under this alternative may not be able to maintain a 10-foot distance for commercial sensitive uses or a 20-foot distance for residential sensitive uses from the construction noise source, which would result in significant impacts. Construction noise BMPs would be implemented, per PDF-NOI-2, to minimize noise impacts from construction activities.

Similarly, some Alternative 3 construction activities could result in substantial vibration impacts. The impact would be less than significant for the vast majority of construction sites. However, where the distance from the construction vibration source to the building foundation of the nearest structure is fewer than 8 feet or where the distance to the nearest occupied space of a sensitive use is fewer than 23 feet, temporary significant impacts would occur. Exceedances of the applicable construction noise thresholds would still occur even after implementation of the construction vibration BMPs in PDF-NOI-3. Impacts would be significant.

Similar to the proposed Project, Alternative 3 would not result in any permanent change to noise levels; it would not expose people residing or working in the project site area to, or otherwise generate, excessive noise levels and this impact would be less than significant.

5.4.4.11 Public Services

Exclusion of sidewalk repair projects that have the potential to affect known historic, tribal cultural, unique archaeological, or unique paleontological resources from the ordinance proposed under Alternative 3 would not result in impacts on public services that are different from those under the proposed Project. Under this alternative, the nature of construction activities and operations remain unchanged from the proposed Project. Demand for additional public services is usually created when there is a net increase in population in an area as a result of a project. Alternative 3 projects would not result in an increase in population because the construction crews employed to repair and maintain the sidewalks or remove and replace the street trees would not require relocated housing during construction. The sidewalks being repaired are existing sidewalks that are already serving the existing population, and there is no evidence that ensuring the accessibility of the sidewalks under this alternative would lead to increased population growth. Construction activities for sidewalk repairs and street tree removal/replacement have the potential to temporarily increase the demand on police services and affect their response times due to temporary lane and road closures, which may also delay emergency responders. However, the lane closures would be infrequent and limited to small portions of streets, and would not result in mobility conditions that would be substantially different from existing conditions on roadways. Project construction would also comply with requirements and policies relating to fire safety practices, and PDF-TR-1 that includes compliance with the current edition of the WATCH manual. Therefore, there is no need for additional fire protection services apart from the existing level of service available within the City.

Construction staging is also not expected to inhibit access to police or fire protection facilities. No other element of the continuing construction activities or operations (such as watering and inspecting the street trees) has the potential to increase the population, nor would it require the expansion of existing or construction of new fire, police, school, library, or park facilities. Impacts on public services would be less than significant.

5.4.4.12 Transportation

Exclusion of sidewalk repair projects that have the potential to affect known historic, tribal cultural, unique archaeological, or unique paleontological resources from the ordinance proposed under Alternative 3 would not result in transportation impacts that would be different from those under the proposed Project. Under this alternative, the nature of construction activities and operations remain unchanged from the proposed Project; the total amount of sidewalk repairs and street tree removal/replacements under Alternative 3 would remain comparable to the Project, even with the exclusion of some projects. Accordingly, similar to the proposed Project, the maximum estimated daily construction trip generation at any single repair site would remain at 76 daily trips (with up to approximately half of that total expected during peak hours) and Citywide trips would be similar to those of the Project over the 30 years. As construction activities would be geographically widely distributed throughout the City, a relatively low number of trips would be generated at any individual construction site, and the effects of lane closures and parking restrictions would be minimized through compliance with LAMC Section 62.61 and the WATCH manual, as well as through the use of flagpersons, in-street construction impacts related to temporary traffic constraints would be less than significant. The temporary traffic impacts would not be substantial during construction, which may last up to 30 days at any construction site.

The likely impacts on bus stops would be limited to the maximum 30-day construction period and would be coordinated with the appropriate transit providers to ensure that effects on bus riders would be minimized. In addition, due to the short-term duration of loss of access related to driveway obstructions, parking spaces, and disruptions to pedestrian travel and coordination of construction activities with affected property owners and occupants, impacts related to potential temporary loss of access would be less than significant. Activities under this alternative involve rehabilitation, maintenance, replacement, safety, and repair projects designed to improve the condition of existing transportation assets and would not add motor vehicle capacity; as such, Alternative 3 is not likely to lead to substantial or measurable increases in vehicle travel. This alternative, like the proposed Project, does not require further assessment for residential street impacts because the operational activities from the Project would not generate a net increase of 250 or more daily vehicle trips. Impacts would be less than significant.

5.4.4.13 Tribal Cultural Resources

Under this alternative, the nature of construction activities and operations of individual sidewalk repair projects remain unchanged from the proposed Project and, as under the proposed Project, construction and operation would occur simultaneously at various times and locations (i.e., sidewalk repair/street tree removal and replacement street tree watering). However, sidewalk repair projects that are located in areas where they have the potential to affect known historic, tribal cultural, unique archaeological, or unique paleontological resources would be excluded from the ordinance proposed under Alternative 3, and thus significant impacts that would occur from Scenario 3 projects under the proposed Project would be avoided under Alternative 3. Therefore, the ordinance under Alternative 3 would apply to only those projects where the sidewalk

improvement would not have the potential to result in a substantial adverse change to TCRs or can be avoided entirely. Similar to the proposed Project, impacts on TCRs would be less than significant under Scenarios 1 and 2 wherein it is unlikely that native fill will be involved during construction and utility relocation. Impacts would be less than significant.

5.4.4.14 Utilities and Service Systems

Exclusion of sidewalk repair projects that have the potential to affect known historic, tribal cultural, unique archaeological, or unique paleontological resources from the ordinance proposed under Alternative 3 would not result in utilities and service systems impacts that would be different from those under the proposed Project. Under this alternative, the nature of construction activities and operations remain unchanged from the proposed Project; the total amount of sidewalk repairs and street tree removal/replacements under Alternative 3 would remain comparable to the Project, even with the exclusion of some projects. Accordingly, similar to the proposed Project, Alternative 3 would result in less-than-significant impacts with respect to water demand not exceeding the existing and planned water supply; being adequately served by existing and planned water and waste infrastructure; not exceeding the future planned drainage capacity (as defined in the City General Plan) or the wastewater treatment requirements of the Los Angeles RWQCB; and not conflicting with solid waste policies and objectives in the City Solid Waste Management Policy Plan, Framework Element, or Source Reduction and Recycling Element. Impacts would be less than significant.

5.4.4.15 Energy

Exclusion of sidewalk repair projects that have the potential to affect known historic, tribal cultural, unique archaeological, or unique paleontological resources from the ordinance proposed under Alternative 3 would not result in energy impacts that would be different from those under the proposed Project. Under this alternative, the nature of construction activities and operations remain unchanged from the proposed Project.

As under the Project, the removal of street trees under this alternative could indirectly increase electricity consumption because of the urban heat island effect. However, this alternative would plant up to 30,405 street trees, resulting in an overall net gain of 128 acres in the street tree canopy beginning in year 30 and continuing beyond year 30, which would offset the temporary urban heat island effects. Construction activities would rely on diesel-powered generators to produce the electricity required to operate electrical equipment. Similar to the proposed Project, it is anticipated that the utilities would address electricity demands within their respective service territories, which are under the oversight of the California Public Utilities Commission, and plan for utility demand through their annual Energy Resource Recovery Account proceedings in which energy forecasts are refined. Alternative 3 would not have a detrimental effect on local and regional energy supplies or requirements for additional capacity, nor would it impede a local utility's ability to meet the peak- and base-period demand for electricity and other forms of energy.

Similar to the Project, during construction under this alternative, transportation fuel would be required and consumed at a rate of approximately 148,705 gallons per year during peak activity, or approximately 3.3 million gallons (418,456 BTUs) over the 30-year lifetime of the alternative. Vehicles used for street tree watering and inspections during post-construction operations would result in the consumption of approximately 10,623 gallons of transportation fuel per year, or approximately 318,690 gallons over the 30-year period. The City would use a fleet of fuel-efficient

vehicles for all work that would be required under this alternative, which would reduce the demand for transportation fuels. Therefore, Alternative 3 would not result in a wasteful, inefficient, or unnecessary usage of energy; result in a substantial increase in energy demand that would affect local or regional energy supplies; or require additional capacity or infrastructure to meet an increased demand. There would be a less-than-significant impact related to electricity and transportation fuel consumption. Impacts would be less than significant.

5.4.4.16 Wildfire

Exclusion of sidewalk repair projects that have the potential to affect known historic, tribal cultural, unique archaeological, or unique paleontological resources from the ordinance proposed under Alternative 3 would not result in wildfire impacts that would be different from those under the proposed Project. Under this alternative, the nature of construction activities, operations, and location of individual sidewalk repair projects remain unchanged from the proposed Project; wildfire impacts would be similar to those under the proposed Project.

Some repairs would continue to occur in areas that are designated as Very High Fire Hazard Severity Zones. The work would be performed on concrete sidewalks, curbs, gutters, ramps, and other existing built-environment infrastructure. The materials involved are not flammable, and work would not be performed near flammable materials that would exacerbate wildfire risks. Compliance with existing laws, such as those in the LAMC, Fire Code Section 57, et seq., for construction sites on, adjacent to, or in the immediate vicinity of a Very High Fire Hazard Severity Zone would further minimize potential risks. Impacts would be less than significant.

5.5 Environmentally Superior Alternative

In addition to the discussion and comparison of impacts of a proposed project and its alternatives, Section 15126.6 of the State CEQA Guidelines requires that an “environmentally superior” alternative be identified and the reasons for such a selection be disclosed. In general, the environmentally superior alternative is the alternative that would be expected to generate the least amount of adverse impacts. In this case, as detailed above and show in Table 5-3, Alternative 1, Ordinance to Repair Sidewalks and Avoid Removal of Any Street Trees, would result in the fewest impacts on the existing environment; however, it would not avoid the significant impacts related to noise and cultural resources that would occur under the Project, even with the implementation of the relevant PDFs. While Alternatives 2 and 3, respectively, reduce these potentially significant impacts of the proposed Project, they result in only slightly fewer impacts on the environment than the proposed Project (with a relative score of -1 and -2, respectively) and would not meet all the Project objectives.

Alternative 1 is the environmentally superior alternative due to the implementation of an ordinance that would streamline sidewalk repairs and avoid all street tree removals. Under this alternative, less sidewalk would be repaired than under the Project because not all sidewalks can be made compliant with accessibility requirements pursuant to the *Willits* Settlement without removal of street trees; in addition, because there would be no street tree removals or replacements, associated operations activities of new street tree monitoring and watering would not be required. Thus, overall construction activities would be reduced and no street trees would be removed under Alternative 1. Accordingly, impacts related to aesthetics, air quality, biological resources, GHG emissions, noise, public services, transportation, utilities, and energy would be less under

Alternative 1 than the proposed Project. Alternative 1 would not meet the Project objectives of ensuring continued and efficient compliance with the requirements of the *Willits* Settlement, in accordance with the applicable accessibility requirements, because some sidewalks will require street tree removals to achieve compliance with applicable accessibility requirements pursuant to the *Willits* Settlement.

