

NOTICE OF PREPARATION

TO: State Clearinghouse
Governor's Office of Planning and Research
1400 Tenth Street
Sacramento, CA 95812

FROM: John Carver
Planning Director
City of Paramount
16400 Colorado Avenue
Paramount, CA 90723

SUBJECT: Notice of Preparation of a Draft Subsequent Environmental Impact Report

PROJECT NAME: Paramount Petroleum AltAir Renewable Fuels Project

PROJECT LOCATION: 14700 Downey Avenue, Paramount, CA 90723

PROJECT CASE #: CUP 757 Amendment

PROJECT APPLICANT: AltAir Paramount

The City of Paramount will be the Lead Agency and will prepare a Subsequent Environmental Impact Report (SEIR) for the Project identified above and all interested agencies, organizations and individuals are invited by the City to comment on the scope and content of the SEIR. This document is a Subsequent EIR to the previously prepared Mitigated Negative Declaration for the Alt-Air Renewable Fuels Project adopted December 30, 2013 and amendments. We need to know the views of your agency as to the scope and content of the environmental information which is germane to your agency's statutory responsibilities in connection with the proposed Project.

The Project description, location and the potential environmental effects are contained in the attached materials.

A Scoping Meeting has not been scheduled for this Project at this time due to the COVID-19 pandemic. For the convenience of property owners and residents in the Project area, comments can be provided via email as detailed below. The Scoping comments should be limited to understanding the proposed Project and associated environmental concerns, including potential mitigation measures and possible alternatives to the Project. The attached Project overview and scope of analysis identified by staff will be used as a starting point for discussion during the scoping meeting, but other environmental concerns may be raised by the public at this meeting.

For current Project information, the following page has been established on the City's website:
<http://www.paramountcity.com/government/planning-department/planning-division/environmental-documents>

Due to the time limits mandated by State law, your response must be received at the earliest possible date, but not later than 30 days after receipt of this notice.

Please send your response to John Carver, Planning Department Director, at the address shown above or email to the email address below.

Date: June 4, 2020

Planner: John Carver, JCarver@paramountcity.com

Department: Planning

Telephone: (562) 220-2048

cc: Clerk of the Board (please post for 30 days)

Encl: Project Overview and Scope of Analysis

PROJECT OVERVIEW AND SCOPE OF ANALYSIS

A. Applicant

Kathryn Gleeson, Director Environmental Services
AltAir Paramount
14700 Downey Avenue
Paramount, California 90723

B. Project Location, Current Use, and Surrounding Use

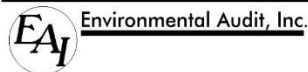
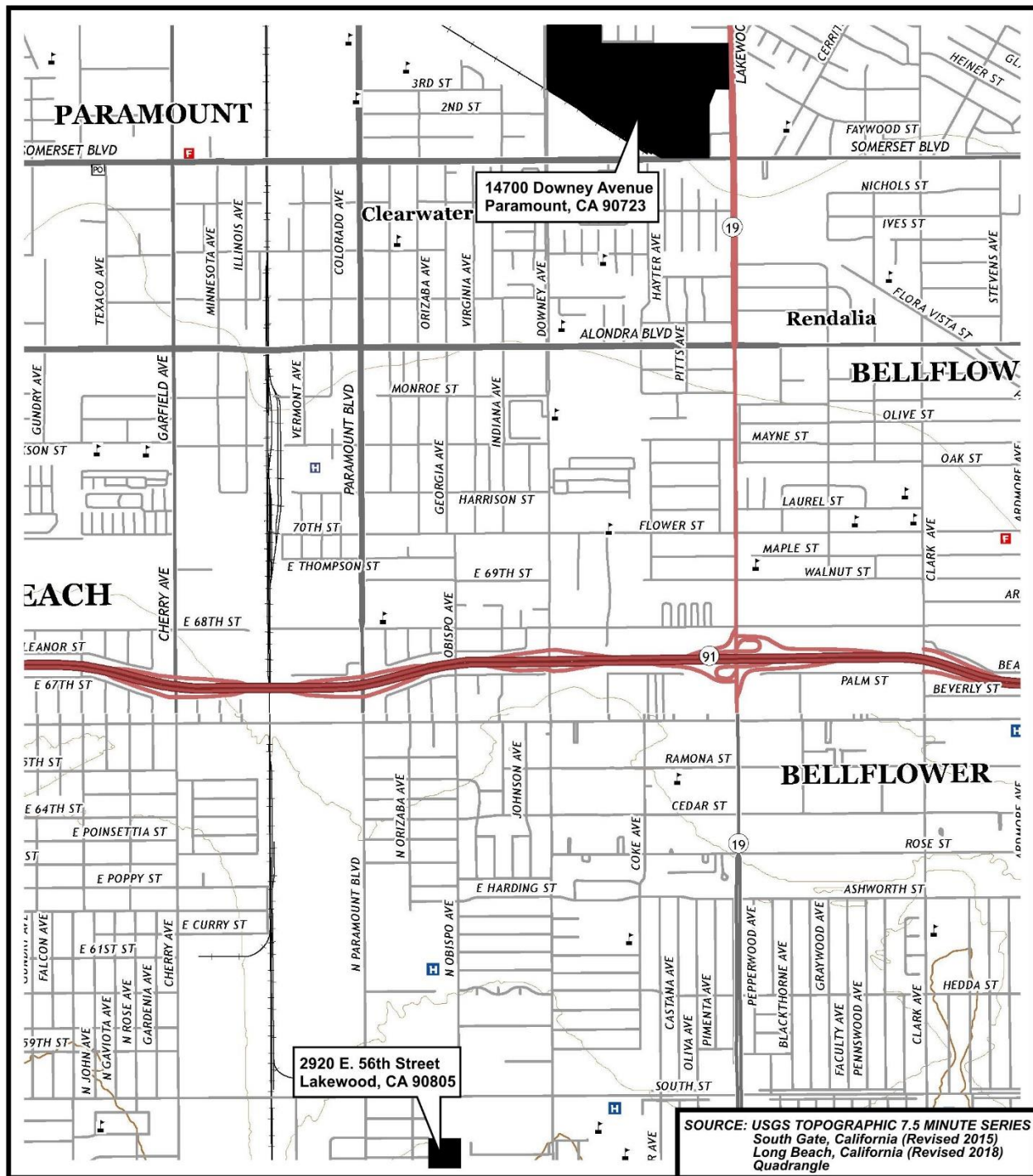
The Refinery is located at 14700 Downey Avenue, Paramount, California (see Figure 1). The City is located east of the Los Angeles River and is approximately 16.5 miles southeast of downtown Los Angeles. The City of Paramount is bounded by the cities of South Gate, Downey, Bellflower, Long Beach, Compton, and Lynwood. The Refinery is bounded by Lakewood Boulevard, Somerset Boulevard, Downey Avenue, and Contreras Street.

The Paramount Facility resides on a 66-acre complex and includes Refinery processing units, renewable fuel processing units, over 1.7 million barrels of product storage; truck loading and unloading facilities; and railcar loading and unloading facilities. The current renewable fuels operation has been in continuous production since January of 2016.

The Refinery is located immediately west of the City of Bellflower municipal boundary lines, and approximately one-quarter mile south of the City of Downey boundary line. Regional access to the Refinery is provided by Interstates 605 and 710 which run north-south approximately two-and-one quarter miles east and west of the Refinery, respectively. State Route 91 runs east-west and is located approximately two miles south of the Refinery. Interstate 105 runs east-west and is located about three-quarters of a mile north of the Refinery (see Figure 1).

The Refinery accounts for slightly more than half of the total acreage within the Somerset Ranch Area of the 1990 Paramount General Plan. The Somerset Ranch Area of Paramount is designated as “Mixed Use” and includes a mix of residential, commercial, industrial, and public uses. The Refinery is zoned M-2, Heavy Manufacturing. The land use pattern varies widely in the Paramount area on a parcel by parcel basis and reflects an area in transition from a variety of older land uses (that include the Refinery) to newer development (including apartment houses and commercial land uses, e.g., grocery stores and a Walmart).

The Project also includes utilizing two existing 55,000-barrel storage tanks at the Lakewood Tank Farm. The Lakewood Tank Farm is located at 2922 E. South Street, Lakewood, California (see Figure 1). The Tank Farm is zoned by the City of Lakewood as M-1 (light manufacturing). The Tank Farm is located on South Street, west of Downey Avenue. Regional access to the Tank Farm is also provided by Interstates 605 and 710. Land uses surrounding the Tank Farm include commercial and residential land uses, as well as Davenport Park.



SITE LOCATION MAP PARAMOUNT PETROLEUM ALTAIR RENEWABLE FUELS PROJECT

0 2,000'



C. Request/Description

Overview of the Project:

In 2018, World Energy purchased AltAir and the Paramount Refinery, and AltAir became a wholly owned subsidiary of World Energy. Under World Energy, AltAir proposes to complete the conversion of the Paramount Refinery to manufacturing only renewable fuels.

The modifications to the Renewable Fuels Project will convert the remainder of the Paramount crude oil Refinery into a renewable fuels production facility, eliminating the refining of crude oil. The Project modifications will include a new Pretreat Unit, modifications to the existing Renewables Fuels Units, a new Renewable Fuels Unit, a new Hydrogen Generation Unit, a new Hydrogen Recovery Unit, a new Propane Recovery Unit, upgrades to the existing wastewater treatment system, a new Hydrogen Sulfide Recovery Unit, a second Sour Water Stripper, a new flare, modifications to the truck and rail loading/unloading racks, and new pipelines within the facility. In addition, some existing tanks will be upgraded/repared and be permitted to handle different products (e.g., non-edible vegetable oils and beef tallow). The Project also includes utilizing two existing 55,000-barrel storage tanks at the Lakewood Tank Farm. Table 1 summarizes the changes made to the Refinery as part of the Renewable Fuels Project, as well as those proposed under the currently revised Renewable Fuels Project.

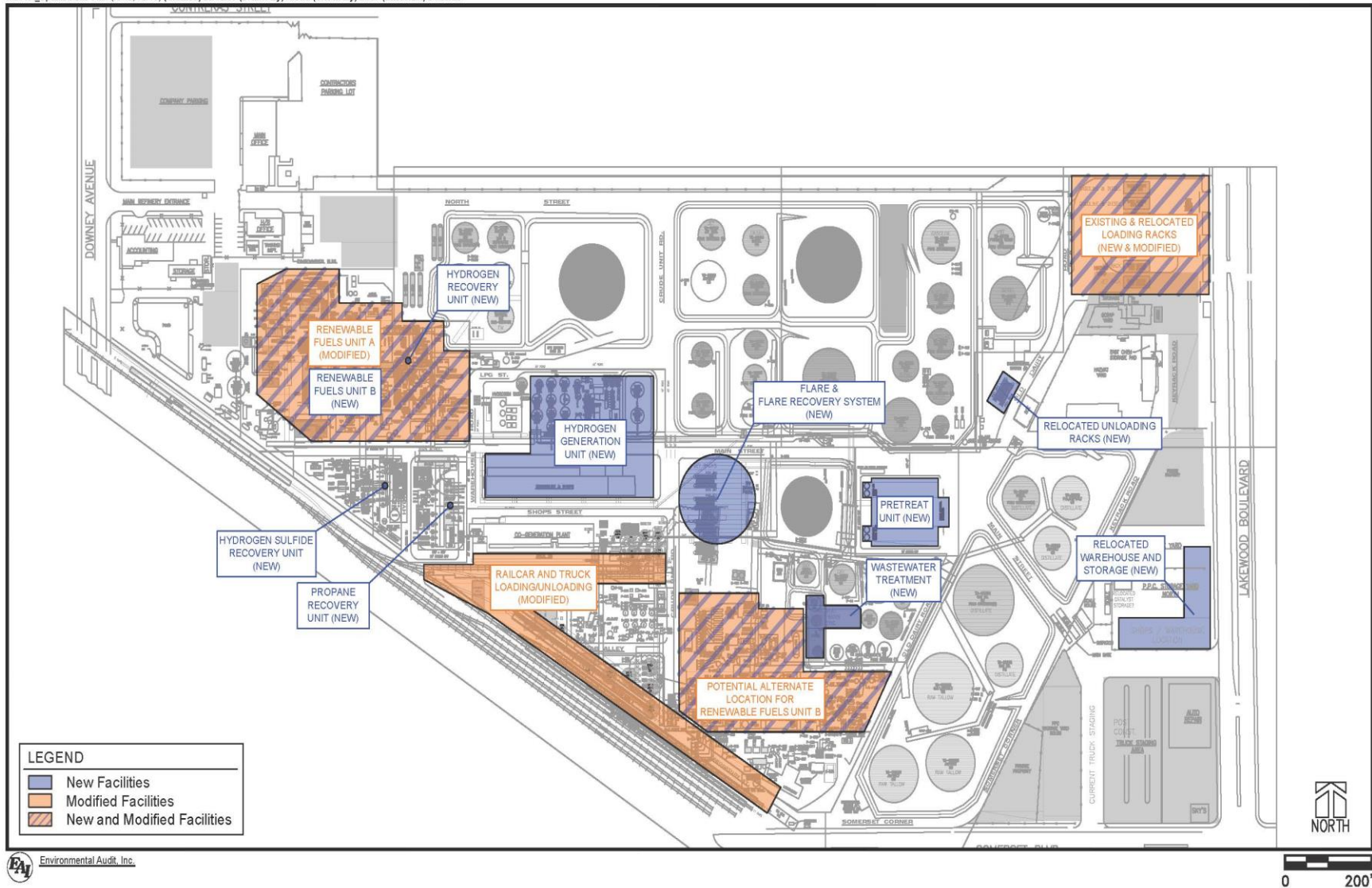
TABLE 1. Comparison of Renewable Fuels Project and Revised Renewable Fuels Project

RENEWABLE FUELS PROJECT	REVISED RENEWABLE FUELS PROJECT
Raw Material	
Only technical grade feed material is processed on site.	Additional and various grades of raw feedstocks will be available for Renewable Fuels Units A and B. Products will be received from domestic and international suppliers, with approximately 25% of the supply being barged to LA Harbor, transferred to tankage and from there trucked to the Paramount facility.
Modify rail unloading rack and one truck unloading rack to unload tallow and vegetable oil.	Existing asphalt loading and unloading rail facilities will be converted to receive raw materials. New rail track internal to the facility will be installed.
Process Units	
No pretreatment is required for technical grade feed material	A pretreatment unit will be added so that a greater variety and grade of feed materials can be processed
Renewable Fuels Unit A	Expand Renewable Fuels Unit A. Install New Renewable Fuels Unit B.
Support Units	
Liquid hydrogen supplied via truck and converted to gas and then compressed by a hydrogen compressor	Install New Hydrogen Generation Unit and New Hydrogen Recovery Unit.

RENEWABLE FUELS PROJECT	REVISED RENEWABLE FUELS PROJECT
	Initially upon completion of Unit A upgrade, use existing pipeline to bring in additional hydrogen. Following the construction of the Hydrogen Generation Unit, the pipeline may be used to transfer out excess hydrogen from the Hydrogen Generation Unit to other users or to receive back-up hydrogen supply.
The Naphtha Stabilizer separates Naphtha from light products. The remaining propanes and butanes are mainly for use as facility fuel gas	Add propane recovery equipment to the Naphtha Stabilizer unit to recover propane and butane from process gases for use in product blending or for fuel.
Amine Scrubber was modified to use an amine solution that removed carbon dioxide in addition to hydrogen sulfide for fuel gas treatment. Sour gas from the amine treating unit was routed to H-907 incinerator and caustic scrubber for sulfur removal. Sulfide agent purchased for processing needs.	New Hydrogen Sulfide Recovery Unit to remove hydrogen sulfide from acid gas and return it to the renewable fuel process units, which reduces purchases and truck trips of sulfiding agent, as well as the volume of acid gas requiring treatment at the incinerator.
Sour water (water containing hydrogen sulfide and ammonia) is managed in Sour Water Stripper	The Sour Water Stripper Unit will be modified for the additional sour water that will be generated by the increased operation.
Use existing flare system for Renewable Fuels Unit A	Install second flare which will be balanced with the existing flare to serve existing and new hydrogen and processing units.
Use Existing Wastewater Treatment System	Upgrade Wastewater Treatment System to handle increased process generated wastewater
Utilities	
Use existing boiler feed water system	New water treatment unit for boiler feed water used at the Hydrogen Generation Unit will be installed.
Use existing boilers for steam.	Use steam produced in Hydrogen Generation Unit supplemented by Cogen Plant steam. Use existing boilers as back up.
Use existing cooling towers	Refurbish and return two additional existing cooling towers to service
Use existing plant air compressors (C-055 and C-001)	Upgrade existing compressors and purchase up to two new compressors.
Products and Logistics	
Storage Tank Modifications – change the material stored in existing tanks	Change the material stored in additional existing storage tanks.
Use existing truck loading racks	Additional existing truck loading racks will be converted from asphalt to renewable fuels and relocated to support new operation.
Use on-site tankage	Use existing off-site Lakewood Tank Farm for storage and blending of jet fuel in addition to on-site tankage.

The locations of the new and modified facilities are shown in Figure 2.

I:\3119\ Updated Site Plan (rev.3, ver13) (Created) 06/13/19 (Drawn By) A.S.K. (Check By) M.C. (Last Rev.) 04/01/20



PRELIMINARY PLOT PLAN
Paramount Petroleum Alt Air Renewable Fuels Project

Background:

AltAir has been in partnership with Paramount Petroleum since 2013, when the Paramount Refinery began the process of converting portions of their oil Refinery into renewable fuels production, under the Paramount Petroleum AltAir Renewable Fuels Project (Renewable Fuels Project). This Project resulted in the repurposing and modification of existing Refinery equipment, primarily the No. 5 Hydrodesulfurization Unit (No. 5 HDS), and the Isomerization Unit as well as some auxiliary treating, vessels, reactors, and stripping units to produce renewable diesel, jet fuel, and naphtha, as well as fuel gas for the heaters and boilers in the processing units from beef tallow and non-edible vegetable oils. The initial CEQA and permitting efforts were approved by the City of Paramount under Conditional Use Permit (CUP) 757, and new and modified air permits were issued by the South Coast Air Quality Management District (SCAQMD). CUP and SCAQMD permit modifications were made as the Project continued to evolve, with the most recent modification approval occurring in November 2015. Construction of the initial modifications to the Paramount Refinery to produce renewable fuels occurred between 2014 and 2015, and the facility began producing Renewable Fuels in 2016.

AltAir's renewable products provide a source of energy in support of California and Federal Low Carbon Fuel Standards. The goals of the standards are to reduce carbon intensity of transportation fuels, complement other state measures for reducing greenhouse gases, transform and diversify the transportation fuel pool, reduce petroleum dependency, and reduce overall air emissions. AltAir's fuels meet all regulatory and commercial specifications without requiring engine modification, while securing a lower emission alternate renewable energy source. AltAir currently supplies renewable gasoline, diesel and jet fuel to fleet services such as UPS, United Airlines, Boeing, the Department of Defense and several California municipalities and school systems, reducing both truck and airline emissions.

AltAir is now proposing to revise the Renewable Fuels Project to include a more comprehensive conversion of the Refinery. The Renewable Fuels Project will convert the remainder of the 39,500 barrel per day crude oil Refinery into a 25,000 barrels per day renewable fuels production facility. This conversion will: eliminate the refining of crude oil; support use of renewable jet fuel, diesel, gasoline and propane; reduce mobile fuel emissions; and will add approximately 30 workers to the current 100 existing jobs.

Construction:

Construction will be phased, with the modifications to Unit A to be completed immediately following receipt of SCAQMD permits to construct. Unit A will be onstream while demolition activities are being completed to allow space for new construction. Demolition activities include relocation of loading and unloading racks and buildings, and removal of asphalt facilities to make room for new equipment installation, including the pretreatment unit, Hydrogen Generation Unit, and new equipment required for Unit B and the support units and utilities (see Table 1). Construction activities will overlap some of the demolition activities and then continue through completion. Therefore, full construction and commissioning activities will take place over a 2 – 3-year timeframe. The demolition activities are expected to occur over a 10-month period and will

overlap an estimated 19 months of Unit B construction activities. AltAir will modify existing equipment, demolish unused equipment that is located where new equipment will be placed, idle-in-place unused equipment, and install new equipment as detailed above.

D. Required Approvals

The proposed Project would require approval from the following public agencies:

- South Coast Air Quality Management District;
- Los Angeles County Sanitation District;
- Los Angeles County Fire Department;
- Regional Water Quality Control Board; and
- Los Angeles Department of Public Works.

E. Project Background

The purpose of the SEIR is to assess the incremental differences between the original Project and the proposed modification in order to evaluate whether the modifications to the original proposal would result in any significant environmental impacts. The SEIR will also identify possible ways to minimize those significant impacts, as well as describe and analyze possible alternatives to the proposed Project if potential significant impacts are identified. Preparation of an NOP and SEIR does not indicate a decision by the City to approve or disapprove the Project. However, prior to making any such decision, the City Council must review and consider the information contained in the SEIR.

F. Issue Areas

The environmental analysis for the proposed Project will focus on Aesthetics, Air Quality, Greenhouse Gas Emissions, Hazards & Hazardous Materials, Hydrology & Water Quality, Land Use & Planning, Noise, Transportation, Tribal Cultural Resources, and Utilities & Service Systems. In addition, other issue areas will be discussed along with statutorily required sections and discussion of Project alternatives and cumulative impacts. Some refinement to the issues may be required based on comments received during the NOP scoping process. The following section describes each of the technical Chapters of the EIR in further detail. Each specified impact area warrants an objective and systematic discussion that identifies the baseline environmental setting; thresholds of significance; impacts and their severity; and, where the impact is potentially significant, the mitigation measures to avoid, reduce or eliminate the impact.

Aesthetics

The Aesthetics chapter of the SEIR will include an assessment of the Project area's existing visual resources, the character of public views into, and out of the Project site, and the night-time setting and character of the Project site. The analysis will include potential impacts from the proposed Project on scenic vistas and resources and potential adverse effects from new sources of light. The proposed modifications would include an estimated 13 new vessels, towers, and reactors ranging in size from 35 feet to 100 feet, as well as a proposed flare and heater stack that could exceed 100

feet. This will require a variance from the current height limit in Heavy Industrial Zones of 55 feet. The new vessels, towers, reactors, and flare are expected to be visible to the surrounding community and may make a significant visual change to the facility. The proposed modification to the Lakewood Tank Farm will not require construction of new equipment; no impacts to aesthetics are expected to result from the Lakewood Tank Farm.

There are not expected to be any impacts to scenic resources as all the proposed modifications would continue to be located within the existing property boundaries. No substantial increase in lighting is expected to result from the Project. Construction activities will take place during daylight hours, and the modified Project would continue to operate within the confines of the existing facility which currently contains permanent lighting for nighttime operations. The previous mitigation measure that requires light shielding for any new lighting equipment will continue to apply to the proposed modifications.

Air Quality

The Air Quality chapter of the SEIR will summarize the regional air quality setting, including climate and topography, existing ambient air quality, regulatory setting, and presence of any sensitive receptors near the Project site. The analysis will include potential impacts from criteria air pollutants, toxic-air contaminants, odor-causing compounds, and consistency of the Project with the regional air quality management plan. Toxic emissions and impacts will be assessed using California Air Resources Board (CARB) models and methods and submitted to the South Coast Air Quality Management District (SCAQMD) as appropriate.

The proposed Project modifications are expected to be consistent with the Paramount General Plan, and therefore are expected to be consistent with the 2016 Air Quality Management Plan. Although crude oil will no longer be processed at the site, the Project modifications will result in an increase in emissions from combustion units, additional fugitive emissions (pumps, valves, and compressors), storage tanks, and mobile sources (trucks and employee vehicles). These are new emissions that were not evaluated in the December 2013 Final MND and will require additional impact analyses. Analysis of cumulative impacts will consider future activities at the affected facilities and other projects in the area. Mitigation measures will be developed in accordance with the current SCAQMD Rules and Regulations, Clean Air Plan, and CEQA Handbook. Mitigation measures will be incorporated, where possible, to reduce any potentially significant impacts to a level of insignificance.

Greenhouse Gas Emissions

The Greenhouse Gas Emissions chapter of the SEIR will assess the potential impacts from emissions against the local agency Significance Thresholds (SCAQMD). The proposed Project modifications will increase the amount of renewable fuels produced and further assist with implementing the Low Carbon Fuel Standard (LCFS) by reducing the carbon intensity of transportation fuels. However, the proposed modifications will result in an increase in GHG emissions from combustion units (boilers and heaters), the new Hydrogen Generation Unit, and mobile sources (trucks and employee vehicles). Additional GHG emissions will be generated by construction equipment and mobile sources associated with construction activities. These are new

sources of emissions that were not evaluated in the December 2013 Final MND; as a result, there may be potentially significant impacts associated with the proposed modifications. The Refinery is subject to GHG emission reductions pursuant to AB32, the state-wide GHG reduction plan. The GHG emissions expected to result from the proposed Project will be evaluated in the SEIR, along with their potential impacts on applicable GHG plans, policies, and regulations. Mitigation measures will be proposed, where possible, to reduce any potentially significant impacts to a level of insignificance.

Hazardous Materials/Risk of Upset

The main objectives of the Hazardous Materials/Risk of Upset analysis are to disclose the following to the public and decision-makers: the potential for serious accidents, exposure to the public, the safety and environmental risks of spill events, and the mitigation measures that could reduce these risks. This analysis will consider the potential for hazards, including pool/torch fires, explosion overpressure, thermal radiation, and releases of toxic materials.

The proposed Project modifications will eliminate the processing of crude oil at the site. Animal fats and vegetable oils will replace crude oil as the feedstocks; these feedstocks do not contain the toxic pollutants that crude oil does and are not as flammable as crude oil. While reductions in hazards are expected (e.g., modifying storage tanks to store renewable feedstock), several new units and process vessels may contain flammable explosive vapors, and potential ignition sources will be present at the renewable fuels production facility. These hazards could result in new, off-site impacts that could be potentially significant. The potential hazards associated with new and modified units as well as hazardous emissions impacts on schools and other sensitive receptors in the Project area will be evaluated for both the renewable fuels production facility and Lakewood Tank Farm as part of the analysis completed for the SEIR. Mitigation measures will be proposed, where possible, to reduce any potentially significant impacts to a level of insignificance.

Hydrology & Water Quality

The Hydrology and Water Quality chapter of the SEIR will summarize the setting of the Project site and identify potential effects on drainage, flooding, groundwater, and water quality. This chapter will evaluate the Project's consistency with water quality control plans, waste discharge requirements, and groundwater management plans. The proposed Project modifications are not expected to result in significant impacts to groundwater recharge, drainage patterns, flooding, impacts to stormwater drainage systems, flood hazards to structures, inundation from dam or levee failure, or impacts from seiche, tsunami, or mudflows.

The proposed Project is expected to be a water-demand Project as defined in CEQA Guidelines Section 15155. The proposed modifications include the construction of several new units that will require additional water including the Pretreat Unit and the new Hydrogen Generation Unit. The Project modifications will increase the water use and potentially use additional groundwater volumes, both of which could have potentially significant impacts. The proposed modifications will also result in an increase in wastewater discharge, up to approximately 642,000 gallons (446 gpm). Existing wastewater treatment equipment will be modified to treat an increase in wastewater

generated by the Project modifications. Mitigation measures will be proposed, where possible, to reduce any potentially significant impacts to a level of insignificance.

Land Use and Planning

The Land Use and Planning chapter of the SEIR will evaluate the consistency of the proposed Project with governing land use plans and policies, as well as the Project's compatibility with surrounding land uses, both existing and proposed. All of the proposed modifications to the Renewable Fuels Project would continue to be located within the existing Refinery and an existing Tank Farm. The existing Refinery is included in the Somerset Ranch Area Plan and zoned as M-2 Heavy Manufacturing under the City of Paramount zoning Codes. The Project is consistent with the land use and zoning, and no zone change, or general plan amendment will be required to accommodate the Project modifications. A Conditional Use Permit (CUP) and a Zone Variance associated with the heights of some of the new structures will be required. The Lakewood Tank Farm is zoned by the City of Lakewood as M-1 (light manufacturing). The Project modifications would continue the use of the existing storage tanks which are compatible with the M-1 zoning. The Project would not conflict with general plan designation, zoning, or conservation plans.

Noise

The Noise chapter of the SEIR will include an evaluation of the existing noise environment and prediction of Project-generated noise from both construction and operation of the proposed Project. Heavy construction equipment and construction-related traffic will generate potentially significant impacts. Several new noise-generating sources will be added to the Refinery. The analysis will include the potential increase in noise associated with the new sources, including the potential for groundborne vibrations. Once constructed, the proposed Project is expected to produce noise in excess of current operations. However, there will be no increase in noise at the Tank Farm following completion of construction activities. Potential noise associated with traffic effects will be evaluated in relation to the Noise Element of the City's General Plan and relevant ordinances. Mitigation measures will be proposed, where possible, to reduce any potentially significant impacts to a level of insignificance.

Transportation

The Transportation chapter of the SEIR will evaluate impacts of the proposed Project on existing and future transportation systems. A Traffic Impact Study will be used to examine the surrounding intersections in the area and the potential impacts the proposed Project may have on the roadways (i.e., level of service analysis). This section will evaluate the adequacy of site access, emergency access, possible design hazards, and on-site circulation. This chapter will include additional analysis of Vehicle Miles Traveled induced by the proposed Project, as well as potential impacts to rail transportation.

The proposed Project modifications will increase rail and truck traffic above the levels evaluated in the December 2013 Final MND. The modifications will increase the delivery of feedstocks by an additional 21,500 barrels per day via ship, railcar, and/or truck. The modifications could require a maximum of approximately 44 railcars per day. Products (gasoline, diesel fuel, jet fuel) are

expected to be transported from the renewable fuels facility via pipeline or truck resulting in an increase of between 300 to 480 trucks per day. Potential mitigation may include the development of a traffic control plan to mitigate potential impacts.

Tribal Cultural Resources

The Tribal Cultural Resources chapter of the SEIR will discuss the potential impacts to historical, cultural, or archaeological resources of significance to California Native American tribes. No existing structures at the Refinery or Tank Farm are eligible for listing in the California Register of Historical Resources or included in a local register of historic resources. The Project modifications would remove Refinery structures and units; however, the buildings, structures, and equipment do not meet the eligibility criteria and would not yield historically important information. No structures would be demolished at the Lakewood Tank Farm. The potential for archaeological resources at the existing Refinery is low due to the character of subsurface soils (recent alluvium) and the fact that the entire site has been previously graded and developed. Based on previous construction activities at the existing Refinery, the proposed modifications are not expected to result in significant adverse impacts to archaeological or tribal resources.

The proposed Project is undergoing AB 52 tribal consultation with the Gabrieleno Band of Mission Indians – Kizh Nation. A series of mitigation measures may be requested as part of that consultation effort. Mitigation measures will be included, where possible, to reduce any potentially significant impacts to a less than significant level.

Utilities & Service Systems

The Utilities & Service Systems chapter of the SEIR will focus on the potential effects on water supply, wastewater treatment, and solid waste disposal. All of the proposed modifications to the Renewable Fuels Project would continue to be located within the existing Refinery or the Lakewood Tank Farm. The proposed Project modifications include the construction of several new units, such as the PreTreat Unit and the new Hydrogen Generation Unit. The modifications will increase the facility's water use; while water is currently provided to the existing Refinery, the increase in water use may be substantial and exceed one million gallons per day. The proposed modifications will also increase the wastewater discharged, require additional wastewater treatment facilities, and require modifications to the wastewater discharge permit. Project modifications are not expected to result in an increase in storm water or require new or expanded storm water drainage facilities; rainwater and surface runoff are controlled in the facility process areas, collected, and treated. The proposed Project modifications are expected to increase the amount of solid and hazardous waste generated by the renewable fuels production facility; however, the facility will be required to adhere to federal, state, and local regulations with regard to waste handling, treatment, and disposal. Mitigation measures will be proposed, where possible, to reduce any potentially significant impacts to a level of insignificance.

Project Alternatives

Alternatives will be designed to avoid and/or substantially reduce any impacts that cannot otherwise be mitigated to a level below significance. At this time, Aesthetics, Air Quality,

Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology & Water Quality, Land Use & Planning, Noise, Transportation, Tribal Cultural Resources, and Utilities & Service Systems are considered the primary issue areas that may need to be addressed. This analysis will consider the No Project Alternative, and other alternatives found to be appropriate through the CEQA process. The alternatives discussion will include an analysis of environmental impacts of each alternative considered, along with a comparative analysis (matrix) to distinguish the relative effects of each alternative and its relationship to Project objectives. The alternatives analysis will also identify the “environmentally superior alternative” from among the alternatives.