## 7.1 INTRODUCTION

# 7.1.1 Purpose and Scope

The California Environmental Quality Act (CEQA) requires that an Environmental Impact Report (EIR) include a discussion of reasonable project alternatives that would "feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any significant effects of the project, and evaluate the comparative merits of the alternatives" (CEQA Guidelines Section 15126.6). This chapter identifies potential alternatives to the proposed project and evaluates them, as required by CEQA.

Key provisions of the CEQA Guidelines on alternatives (Section 15126.6[a] through [f]) are summarized below to explain the foundation and legal requirements for the alternatives analysis in the EIR.

- "The discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly" (15126.6[b]).
- "The specific alternative of 'no project' shall also be evaluated along with its impact" (15126.6[e][1]).
- "The no project analysis shall discuss the existing conditions at the time the Notice of Preparation (NOP) is published, and at the time the environmental analysis is commenced, as well as what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. If the environmentally superior alternative is the 'no project' alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives" (15126.6[e][2]).
- "The range of alternatives required in an EIR is governed by a 'rule of reason' that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project" (15126.6[f]).
- "Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent)" (15126.6[f][1]).
- "For alternative locations, "only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR" (15126.6[f][2][A]).
- "An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose
  implementation is remote and speculative" (15126.6[f][3]).



For each development alternative, this analysis:

- Describes the alternative,
- Analyzes the impact of the alternative as compared to the proposed project.
- Identifies the impacts of the project that would be avoided or lessened by the alternative,
- Assesses whether the alternative would meet most of the basic project objectives, and
- Evaluates the comparative merits of the alternative and the project.

Per the CEQA Guidelines Section 15126.6(d), additional significant effects of the alternatives are discussed in less detail than the significant effects of the project as proposed.

# 7.1.2 Project Objectives

As described in Section 3.2, the following objectives have been established for the proposed project and will aid decision makers in their review of the project, the project alternatives, and associated environmental impacts:

- Objective 1: Create a neighborhood "main street' that will serve as the focal point for the neighborhoods surrounding Lincoln Avenue.
- Objective 2: Preserve and enhance existing residential areas.
- Objective 3: Provide new opportunities for all types of housing along the corridor.
- Objective 4: Facilitate opportunities for catalytic developments that provide desired neighborhoodoriented retail and service businesses, local employment opportunities, and a link to the community.
- Objective 5: Provide for the gradual phasing out of industrial uses that create conflicts with surrounding neighborhoods.
- Objective 6: Support design that contributes to the enhanced character of the City and Northwest Pasadena in particular.
- Objective 7: Enrich the pedestrian environment along Lincoln Avenue through well-designed and appropriately scaled projects and pleasing streetscapes.
- Objective 8: Invite pedestrian activity through a cohesive and improved streetscape corridor.
- Objective 9: Encourage investment, maintenance, and pride in the Lincoln Avenue Specific Plan area.
- Objective 10: Enhance public safety.

# 7.2 ALTERNATIVES CONSIDERED AND REJECTED DURING THE SCOPING/PROJECT PLANNING PROCESS

The following is a discussion of the land use alternatives considered during the scoping and planning process and the reasons why they were not selected for detailed analysis in this Draft EIR.

# 7.2.1 Alternative Development Areas

The City of Pasadena is largely built out. In general any development or redevelopment along a similar underutilized corridor within the City would not avoid or substantially lessen any of the significant effects of the project. Redevelopment of substantially the same size would have similar impacts on traffic, air quality, GHG emissions and noise for both operation and construction. Given that the Lincoln Avenue Specific Plan area is currently developed and is served by existing infrastructure, it is unlikely that any alternative development area would have lesser impacts related to hydrology/water quality, public services, and utilities/service systems. Further, since the project area is located near employment opportunities it provides benefits related to land use/planning and population/housing that may not be achieved in another location. Impacts related to aesthetics, geology, hazards/hazardous materials would need a site specific analysis to determine if another location would reduce impacts. These impacts were found to be less than significant and less than significant with mitigation incorporated. Alternative development areas were not considered because it was determined that another location would not avoid or substantial lessen the effects of the project.

Additionally, an alternative development area would not meet the basic objectives of the project. The geographic location of the Lincoln Avenue Specific Plan site was specifically chosen to enhance an underutilized area, phase out industrial uses, and create a neighborhood main street compatible with the surrounding area. While another location could meet some of the objectives in a general sense, it would not meet any of the project objectives for this particular corridor, neighborhood, and location.

## 7.2.2 Reduced Traffic Alternative

This alternative was considered to eliminate significant and unavoidable impacts related to traffic. In order to reduce impacts to a less than significant level project-generated trips would have to be reduced by about 90 percent, from approximately 21,000 to 2,100 daily trips. Based on a proportionate reduction in land uses, the Reduced Traffic Alternative would allow 50,000 square feet (sf) of new commercial development and 9 residential units and no additional Industrial related uses. It should be noted that this alternative would only allow a 25,000 square foot reduction in industrial uses which does not meet a basic objective of the project which is to phase out industrial uses and replace them with neighborhood serving uses that are compatible with the adjacent residential neighborhoods.



The proposed project would cause significant unavoidable adverse traffic impacts to 14 intersections and 15 roadway segments. The worst impact would be created at the intersection of Lincoln Avenue and Washington Boulevard (#7), where the level of service (LOS) due to project impacts would be LOS F in the future year 2022. The Reduced Traffic Alternative would reduce traffic impacts to the point where there would not be a significant and unavoidable traffic impact at any of the study intersections. It should be noted that even with an 85 percent reduction in development (with road diet) the project would still result in a significant impact to Lincoln Avenue and Washington Boulevard (#7) and a 70 percent reduction would result in significant impacts to two additional intersections: Lincoln Avenue & Woodbury Road (#1), and Lincoln Avenue & Westbound I-210 freeway ramps (#5).

While this alternative would substantially reduce traffic impacts, it would not meet any of the basic project objectives. The addition of 50,000 square feet of new commercial development and 9 residential units would not revitalize the area, create a neighborhood main street, or facilitate opportunities for additional housing or catalytic development in the area. Further, without a substantial reduction in the existing underutilized industrial development, this alternative would not meet the objective of phasing out industrial development, which currently conflicts with the surrounding residential neighborhoods. This alternative would not create a more pedestrian friendly environment or encourage pedestrian activity, since it would not create a neighborhood main street. Therefore, the Reduced Traffic Alternative was rejected as being infeasible because it would not meet most of the fundamental objectives of the project.

## 7.3 ALTERNATIVES SELECTED FOR FURTHER ANALYSIS

Based on the criteria listed in Section 7.1.1, above, the following four alternatives have been determined to represent a reasonable range of alternatives which have the potential to feasibly attain most of the basic objectives of the project but which may avoid or substantially lessen any of the significant effects of the project. These alternatives are analyzed in detail in the following sections.

- No Project/Existing 2004 General Plan Alternative
- Increased Residential/Reduced Retail Development Alternative
- Increased Office/Reduced Retail Development Alternative
- Reduced Intensity Alternative

Each alternative's environmental impacts are compared to the proposed project and determined to be environmentally superior, neutral, or inferior. However, only those impacts found significant and unavoidable are used in making the final determination of whether an alternative is environmentally superior or inferior to the proposed project. Impacts involving air quality, GHG emissions, noise, and traffic were found to be significant and unavoidable. Section 7.7 identifies the Environmentally Superior Alternative.

## 7.4 NO PROJECT/EXISTING 2004 GENERAL PLAN ALTERNATIVE

The No Project alternative assumes that the Lincoln Avenue Specific Plan would not be adopted and the existing onsite buildings would remain. Pursuant to CEQA Guidelines Section 15126.6(e)(3)(A), where a project is the revision of an existing regulatory plan the "no project" alternative assumes continuation of the existing plan, policy or operation into the future. Therefore, this alternative assumes that new development and redevelopment would continue to occur in the project area consistent with the existing (2004) General Plan Land Use Element designations, the current zoning map designations and the provisions of the Design Standards and Guidelines for Neighborhood Commercial & Multi-family Districts.

# 7.4.1 Aesthetics

Under the No Project/Existing General Plan Alternative, redevelopment would be allowed to continue consistent with the general plan designations and zoning for the area, which allows for general commercial, neighborhood commercial institutional and residential uses. Without the approved specific plan, disjointed development may occur, although the aesthetic quality of the site and its surroundings would likely be similar to the existing buildings with the exception of existing industrial uses that are currently zoned for commercial uses. No major changes to building height and mass are anticipated under this alternative. Therefore, the character of the site is not expected to change. While this alternative would still be required to meet the City's Design Standards and Guidelines for Neighborhood Commercial & Multi-family Districts, it would not be required to comply with the Lincoln Avenue Specific Plan development standards and design guidelines. New development under this alternative would not be required to incorporate the same level of design that would encourage pedestrian improvements, accessibility and safety to create and activate the street scene. Aesthetic impacts would be less than significant under this alternative; however, impacts would be greater than the proposed project because the aesthetic quality of the area would be enhanced by implementation of the Lincoln Avenue Specific Plan.

# 7.4.2 Air Quality

Under this alternative, demolition, grading, soil export, and building construction would continue to occur as individual projects are approved in accordance with the City's 2004 General Plan. Therefore, short term construction impacts would be similar to the proposed project.

Operational impacts may be greater than the project because development would not occur with the guidance of a comprehensive plan for the area that encourages pedestrian activity, and therefore reliance on cars will be perpetuated. No new residential uses would be allowed, which means the loss of the potential to increase internal trip capture in an area with existing and potential employment opportunities. Development would continue to occur as allowed by the existing land use designations although it is expected to be reduced as compared to the proposed project. Therefore, although full buildout of the project area may be less intense than under the specific plan, there would still be a significant increase in air emissions due to increases in traffic. Therefore, operational impacts would be less than the project, but remain significant and unavoidable.

# 7.4.3 Energy

Under this alternative, redevelopment of the project area in accordance with the City's 2004 General Plan would be similar to buildout of the project, since it would be required to comply with the City's Green Building Standards. As a result, development under this alternative would not cause inefficient and wasteful use of nonrenewable resources. Therefore, impacts are less than significant and similar to the project.

## 7.4.4 Greenhouse Gas Emissions

Under this alternative, redevelopment of the project area in accordance with the City's 2004 General Plan may generate more GHG emissions as compared to the proposed project because it would not reduce VMT by placing housing near employment and encourage pedestrian friendly modes of travel. Traffic generation would be reduced under this alternative; and therefore, GHG emissions would be less. Impacts would be less than the project, but would remain significant and unavoidable.

### 7.4.5 Hazards and Hazardous Materials

Past and present uses and activities within the project area have known or suspected contamination of soils. Continuation of the existing use consistent with the City's 2004 General Plan does not present a significant health and safety impact related to the presence of known or suspected on-site contamination. Future development has the potential to be exposed to suspected sites, and demolition activities may expose construction workers to asbestos containing materials or lead based paints. This alternative would result in the same impacts related to hazards and hazardous materials as the proposed project.

# 7.4.6 Hydrology and Water Quality

Under this alternative, redevelopment of the project area in accordance with the City's 2004 General Plan would result in a similar amount of impervious surfaces as the proposed project. No changes to the volume or velocity of stormwater would occur because the project site is built out and the area of impervious surfaces is not expected to change. Short-term construction-related and long-term water quality would be similar to the proposed project since future projects under this alternative would be required to comply with the Construction General Permit, requiring implementation of a Storm Water Pollution Prevention Plan (SWPPP) for projects one acre in size or more, and prepare a Water Quality Management Plan/ Standard Urban Stormwater Mitigation Plan (SUSMP) for all for all projects that meet the SUSMP thresholds. Therefore, this alternative would be less than significant with mitigation and have similar hydrology and water quality impacts as the proposed project.

# 7.4.7 Land Use and Planning

Under this alternative, development of the project area and retention of existing uses would be consistent with the existing general plan designations for the area. However, this alternative would be less compatible with surrounding residential uses as compared to the proposed project. As described previously, the proposed project would revitalize the area with neighborhood-serving commercial uses and a pedestrian-oriented street



section to replace the central segment of the existing disjointed Lincoln Avenue corridor, currently dominated by heavy industrial uses. This alternative would not provide a catalyst for repurposing former industrial uses and, therefore, would not promote the reinvention of the neighborhood, increase safety and create an active pedestrian focal point for surrounding residents to the same degree as the project. Impacts to land use would be greater than the proposed project because it would allow for the continuation of industrial uses that are less compatible with the surrounding area.

#### 7.4.8 Noise

Under this alternative, grading and construction noise would be similar to the proposed project since development would continue to be allowed in accordance with the City's 2004 General Plan. Stationary noise sources associated with new commercial development would have the potential to increase noise levels at adjacent properties, similar to the proposed project. Operational traffic-related noise would be less since this alternative would generate less vehicle trips. Overall, noise impacts would be less than the proposed project.

## 7.4.9 Population and Housing

This alternative would not allow additional residential units or increase the allowable commercial square footage. This alternative would generate less population and housing impacts, although impacts were found to be less than significant for the proposed project. This alternative would not benefit the areas jobs-rich jobs/housing ratio since it would not introduce more housing to the area. Overall, this alternative would have a slightly reduced impact as compared to the project.

#### 7.4.10 Public Services

Under this alternative, the demands for public services and facilities would be slightly less than those of the proposed project, since it does not include new housing, and therefore, would generate a lower need for police services, schools and libraries. This alternative would also place less demand on local parks, although site specific development under the project would be required to meet parkland dedication and fee requirements. This alternative would have a slightly less impact than the project. However, public services impacts were not identified as significant for the proposed project.

## 7.4.11 Transportation and Traffic

Under this alternative, development in the project area would continue to occur consistent with the general plan. The Future Year 2022 Without Project condition was analyzed in Section 5.11.4 of this DEIR. As shown in Tables 5.11-11 and 5.11-12, the following intersections will operate at a level of service D or worse in the Future Year 2022 condition:

- Lincoln Ave & Woodbury Rd (#1) (AM and PM Peak Hour)
- Windsor Ave & Woodbury Rd (#12) (AM and PM Peak Hour)
- I-210 WB Ramps & Mountain St (#30) (AM Peak Hour)

These intersections operate at an improved level of service compared to the proposed project. However, this alternative would not improve pedestrian connectivity in the project area since it would not include the development of additional pedestrian enhancements, such as additional trees and planters, additional marked crosswalks, additional pedestrian street lighting, enhanced identity and public art, sidewalk repaving, and additional sidewalk ramps and audible traffic controls. Overall, this alternative would have less traffic impacts than the proposed project. However, growth would continue to occur in the area by approximately 1.5 percent per year, which would have a similar impact on roadway intersections and segments. Significant and unavoidable traffic impacts would remain under this alternative.

# 7.4.12 Utilities and Service Systems

This alternative assumes that development would continue to occur as allowed under the City's 2004 General Plan and there would continue to be an increase in utilities and services systems demands. Similar to the project, this increase would be accommodated by existing service providers. This alternative would have less impact than the proposed project.

#### 7.4.13 Conclusion

This alternative is environmentally superior to the proposed project in seven of the twelve resource areas analyzed in Chapter 5: air quality, GHG emissions, noise, population/housing, public services, transportation and traffic, and utilities and service systems. Impacts related to three resources areas would be the same as the proposed project: energy, hazards and hazardous materials, and hydrology/water quality. Impacts would be greater for aesthetics and land use under this alternative.

This alternative would not meet most of the project objectives described in Section 7.1.2 and Section 3.2. Specifically, this alternative would not create a neighborhood "main street" (Objective 1), provide new opportunities for all types of housing along the corridor (Objective 3), or facilitate opportunities for catalytic developments that provide desired neighborhood-oriented retail and service businesses (Objective 4). Further, this alternative would not meet the objectives which contribute to an enhanced pedestrian experience (Objectives 6, 7, 8 and 10).

# 7.5 INCREASED RESIDENTIAL/REDUCED RETAIL DEVELOPMENT

The Increased Residential/Reduced Retail Development Alternative would increase the total number of residential units by 25 percent with a corresponding decrease in retail development by 25 percent. This alternative would allow for a net increase of 23 multifamily residential units and a decrease of 120,000 square feet of specialty retail as compared to the project. This results in a total net increase of 380,000 square feet of commercial uses and 114 residential units. The 300,000 square foot reduction in industrial, educational and institutional uses would remain the same as the project.



## 7.5.1 Aesthetics

Although the mix of residential and commercial uses change under this alternative, development within the area would still be guided by the proposed specific plan. Development would be required to comply with the proposed development standards and design guidelines, which encourage pedestrian connectivity and an enhanced street scene. Therefore, impacts under this alternative would be the same as the proposed project.

# 7.5.2 Air Quality

Construction impacts under this alternative would be similar to the proposed project since the development area would be similar. However, since residential uses generate less daily trips than retail uses, this alternative would reduce daily trips generated by the project by approximately 22 percent. Therefore, operational air quality emissions would also be reduced. Additionally, the VMT would be reduced by placing additional housing near employment to create internal trip capture. Impacts would be less than the proposed project but would continue to have significant and unavoidable impacts for short term construction and long-term operational related impacts.

# 7.5.3 **Energy**

Impacts relating to energy use would be similar to the proposed project. Like the proposed project, development would be required to comply with the City's Green Building Standards, which result in a 15 to 30

percent increase in building energy efficiency compared to the 2008 Building and Energy Efficiency Standards. As a result, development under this alternative would not cause inefficient and wasteful use of nonrenewable resources. Therefore, impacts are similar to the proposed project.

#### 7.5.4 Greenhouse Gas Emissions

This alternative would convert some of the proposed project's retail use to residential use which is a more efficient land use in terms of GHG emissions generated per service population. Additionally, this alternative would generate approximately 22 percent less vehicle trips than the project which reduces GHG emissions. A 22 percent reduction in GHG emissions would result in a net increase of 3,796 MTons of GHG per year, which still exceed SCAQMD's draft bright-line screening threshold. Impacts would be less than the project; however, impacts would remain significant and unavoidable.

## 7.5.5 Hazards and Hazardous Materials

Past and present uses and activities within the project area have known or suspected contamination of soils. Similar to the project, development under this alternative has the potential to be exposed to suspected sites, and demolition activities may expose construction workers to asbestos containing materials or lead based paints. This alternative would have the same hazards and hazardous materials impacts as the proposed project.

# 7.5.6 Hydrology and Water Quality

Under this alternative, development would result in a similar amount of impervious surfaces as the proposed project. No changes to the volume or velocity of stormwater would occur because the area of impervious surfaces is not expected to change. Short-term construction-related and long-term water quality would be similar to the proposed project since future projects under this alternative would be required to comply with the Construction General Permit and prepare a Water Quality Management Plan. Therefore, this alternative would be less than significant with mitigation and have similar hydrology and water quality impacts as the proposed project.

## 7.5.7 Land Use and Planning

Under this alternative, development would be consistent with the City's General Plan goals and policies for the area, as well as the proposed development standards and design guidelines. Similar to the proposed project, this alternative would increase compatibility of the area with surrounding residential uses. This alternative would revitalize the area with neighborhood-serving commercial uses, but provide additional residential opportunities. Development would also create a pedestrian-oriented street section along Lincoln Avenue. Impacts to land use would be similar to the proposed project.

## 7.5.8 Noise

Under this alternative, grading and construction noise would be similar to the proposed project. New stationary noise sources associated with the proposed commercial development would have the potential to increase noise levels at adjacent properties. Operational traffic-related noise would be less than the project, since this alternative would generate approximately 22 percent less vehicle trips. However, mitigation measures required to reduce noise impacts would be required under this alternative. Overall, noise impacts would be less than the proposed project, but would remain significant and unavoidable.

# 7.5.9 Population and Housing

This alternative would be within the growth projections for the City. This alternative would benefit the area's jobs-rich jobs/housing ratio by contributing additional housing. Therefore, impacts would be less than the proposed project.

### 7.5.10 Public Services

Under this alternative, the demand on public services would be slightly more than the proposed project because the addition of 23 multifamily residences would result in increased population generation. The increase in population would generation additional needs for fire protection, police services, schools and libraries. This alternative would also place more demand on local parks, although site specific development would be required to meet parkland dedication and fee requirements. This alternative would have a slightly greater impact than the project.

# 7.5.11 Transportation and Traffic

This alternative would result in approximately 16,532 average daily trips with 712 AM peak hour and 1,574 PM peak hour trips. This represents an approximate 22 percent decrease in average daily trips as compared to the proposed project. Additionally, this alternative would introduce additional residential units near employment resulting in reduced VMT. Traffic impacts under this alternative would be less than the proposed project. However, based on the previous analysis, traffic impacts would remain significant and unavoidable, since trips would only be reduced by approximately 22 percent (a 90 percent reduction is required to eliminate all traffic impacts).

## 7.5.12 Utilities and Service Systems

This alternative would reduce demands on utilities and services systems. The conversion of retail square footage to residential units would result in an overall reduction of 144 employees and an increase of 80 residents to the area. This change would reduce water consumption by about 6,460 gallons per day with a similar reduction in wastewater generation. Solid waste generation would also be reduced.

#### 7.5.13 Conclusion

The Increased Residential/Reduced Retail Development Alternative would lessen impacts to air quality, GHG emissions, noise, population/housing, public services, transportation/traffic, and utilities and service systems. The remaining impacts related to aesthetics, energy, hazards and hazardous materials, hydrology/water quality and land use are generally the same as the proposed project.

The Increased Residential/Reduced Retail Development Alternative would meet all of the project objectives, except that it would not meet Objective 4 to the same degree as the project. The reduction in retail square footage would not facilitate opportunities to provide neighborhood-oriented retail (Objective 4) to the same degree.

## 7.6 INCREASED OFFICE/REDUCED RETAIL DEVELOPMENT

The Increased Office/Reduced Retail Development Alternative would change the proposed mix of commercial development. This alternative would have the same net increase in residential units (91 units) and non-residential development (500,000 square feet) as the project, but would allow for a total of 480,000 square feet of office and 320,000 square feet of specialty retail. The 300,000 square foot reduction in industrial, educational and institutional uses would remain the same as the proposed project.



## 7.6.1 Aesthetics

Development under this alternative would be required to comply with the proposed development standards and design guidelines as well as encourage design that would improve the street section and encourage pedestrian improvements. Converting retail to office uses would not result in a significant change in the aesthetic character or views as compared to the proposed project. Therefore, impacts under this alternative would be the same as the proposed project.

# 7.6.2 Air Quality

Construction impacts under this alternative would be similar to the proposed project since the development area would be similar. However, since office uses generate fewer trips than specialty retail uses, this alternative would reduce daily trips generated by the project by approximately 22 percent. Therefore, operational air quality emissions would also be reduced. Impacts would be less than the proposed project but would continue to have significant and unavoidable impacts for short-term construction and long-term operational related impacts.

# 7.6.3 **Energy**

Impacts relating to energy use would be similar to the proposed project. The development would be required to comply with the City's Green Building Standards, which result in a 15 to 30 percent increase in building energy efficiency compared to the 2008 Building and Energy Efficiency Standards. As a result, development under this alternative would not cause inefficient and wasteful use of nonrenewable resources. Therefore, impacts are less than significant and similar to the proposed project.

## 7.6.4 Greenhouse Gas Emissions

Office development generates less daily vehicle trips and trips per employee than retail development. Therefore, this alternative would result in more efficient land uses in terms of GHG emissions generated per service population. Additionally, this alternative would generate approximately 22 percent less trips than the project which reduces GHG emissions. A 22 percent reduction in GHG emissions would result in a net increase of 3,796 MTons of GHG per year, which still exceed SCAQMD's draft bright-line screening threshold. Impacts would be less than the project; however, impacts would remain significant and unavoidable.

## 7.6.5 Hazards and Hazardous Materials

Past and present uses and activities within the project area have known or suspected contamination of soils. Similar to the project, development of this alternative has the potential to be exposed to suspected sites, and demolition activities may expose construction workers to asbestos containing materials or lead based paints. This alternative would have same hazards and hazardous materials impacts as the proposed project.

# 7.6.6 Hydrology and Water Quality

Under this alternative, development would result in a similar amount of impervious surfaces as the proposed project. No changes to the volume or velocity of stormwater would occur because the area of impervious surfaces is not expected to change. Short-term construction-related and long-term water quality would be similar to the proposed project since future projects under this alternative would be required to comply with the Construction General Permit and prepare a Water Quality Management Plan. Therefore, this alternative would be less than significant with mitigation and have similar hydrology and water quality impacts as the proposed project.

# 7.6.7 Land Use and Planning

Under this alternative, development would be consistent with the City's goals and policies for the area, and the specific plan's development standards and design guidelines. Similar to the proposed project, this alternative would increase compatibility of the area with surrounding residential uses. This alternative would revitalize the area with neighborhood-serving commercial uses and allow for residential opportunities. Development would also create a pedestrian-oriented street section. Impacts to land use would be similar to the proposed project

#### 7.6.8 Noise

Under this alternative, grading and construction noise would be similar to the proposed project. Also, new stationary noise sources associated with the proposed commercial development would have the potential to increase noise levels at adjacent properties. Operational traffic-related noise would be less than the project since this alternative would generate approximately 22 percent less vehicle trips. However, mitigation measures required to reduce noise impacts would also be required under this alternative. Overall, noise impacts would be less than the proposed project.

# 7.6.9 Population and Housing

This alternative, as the proposed project, would be within the growth projections assumed for buildout of the City. This alternative would contribute the same number of residential units to a jobs-rich area as the proposed project. Therefore, impacts would be the same as the proposed project.

#### 7.6.10 Public Services

Under this alternative, the demand on public services would be similar to the proposed project because it would allow the same number of residential units and associated population. The overall amount of non-residential development would not change, and the change of retail/office mix would have similar impacts related to public services as the proposed project.

### 7.6.11 Transportation and Traffic

In general, office development generates less daily vehicle trips than retail development. This alternative would result in approximately 16,540 average daily trips with 900 AM peak hour and 1,654 PM peak hour trips, which is a 22 percent decrease in average daily trips as compared to the proposed project. Traffic impacts under this alternative would be less than the proposed project. However, based on the previous analysis, traffic impacts would remain significant and unavoidable, since trips would only be reduced by approximately 22 percent (a 90 percent reduction is required to eliminate significant and unavoidable traffic impacts).

# 7.6.12 Utilities and Service Systems

In general, office and retail uses place similar demands on utility providers. Therefore, the conversion of retail to office uses would have similar impacts on utilities and services systems as compared to the proposed project.

## 7.6.13 Conclusion

The Increased Office/Reduced Retail Development Alternative would lessen impacts to four resource areas: air quality, GHG emissions, noise, and transportation/traffic. The remaining impacts related to aesthetics, energy, hazards and hazardous materials, hydrology/water quality, land use, population/housing, public



services, and utilities and service systems would be similar to the proposed project. Significant unavoidable impacts would remain related to air quality, GHG emissions, noise and traffic.

This alternative would meet all of the project objectives.

### 7.7 REDUCED INTENSITY ALTERNATIVE

The Reduced Intensity Alternative would reduce development intensity by 50 percent by reducing the allowable development of new and removed buildings for each proposed use by half. Compared to the proposed project, this alternative would result in a reduction of 46 residential units and 270,000 square feet of commercial development compared to the project. Buildout of this alternative would allow 160,000 sf of office, 240,000 sf of specialty retail, 46 residential units, and a corresponding decrease of 130,000 sf of industrial uses.

#### 7.7.1 Aesthetics

Under this alternative, future development would be required to be consistent with the Lincoln Avenue Specific Plan's development standards and design guidelines. While consistency with the specific plan would improve the aesthetic character of the area, it would not occur to the same degree as the proposed project because 50 percent less development would be allowed. Therefore, impacts would be greater than the project.

# 7.7.2 Air Quality

This alternative would reduce overall construction-related air quality impacts due to the reduction in new development. There would be approximately 50 percent less soil disturbance, demolition and construction. In addition, there would be a reduction of approximately 10,579 vehicle trips (about 50 percent less than the project project), resulting in reduced long term operational air quality impacts. While construction and operational air quality impacts would be reduced, similar mitigation measures would be required and air quality impacts would remain significant and unavoidable.

# 7.7.3 **Energy**

Development under this alternative would be required to comply with the City's Green Building Standards, which result in a 15 to 30 percent increase in building energy efficiency compared to the 2008 Building and Energy Efficiency Standards. Energy usage would be reduced by approximately 50 percent as compared to the proposed project. However, the projects energy impacts were not considered significant.

## 7.7.4 Greenhouse Gas Emissions

This alternative would reduce GHG emissions due to the 50 percent reduction in new development and project generated traffic. A 50 percent reduction in GHG emissions would result in a net increase of 8,628 MTons of GHG per year, which still exceed SCAQMD's draft bright-line screening threshold. Impacts would remain significant and unavoidable.

#### 7.7.5 Hazards and Hazardous Materials

Under this alternative, buildings would still be demolished and soils would continue to be excavated, which has the potential to expose workers to hazardous materials. Therefore, this alternative would have similar impacts as the proposed project.

# 7.7.6 Hydrology and Water Quality

Under this alternative, grading activities and construction would be reduced. However, this alternative would also require compliance and implementation of appropriate BMPs, similar to the proposed project. Because the reduced intensity alternative would have no impact on the impervious area coverage, no changes to the stormwater volume would result under this alternative, as with the proposed project. Impacts to hydrology and water quality would be similar to the proposed project.

# 7.7.7 Land Use and Planning

This alternative would be consistent with the proposed specific plan, the City's General Plan and zoning code. Land use and relevant planning impacts are similar to the proposed project. However, this alternative would not increase compatibility of the project site with the surrounding area to the same degree as the project. As a result impacts are slightly greater than the project.

#### 7.7.8 Noise

Under this alternative, both construction and operational noise impacts would be reduced due to the reduced allowable square footage and corresponding decrease in project generated traffic. Construction-related noise impacts would remain significant and unavoidable.

# 7.7.9 Population and Housing

This alternative would result an approximate 50 percent reduction in employment and population as compared to the proposed project. However, this alternative would not contribute as many residential units to an area with a jobs-rich jobs/housing ratio. Impacts would be slightly greater than the proposed project.



# 7.7.10 Public Services

This alternative would reduce development by 50 percent, therefore, employees and residents at businesses and homes within the area would also be reduced by about half. Therefore, impacts to fire, police, school, and library services would be reduced, and would have less impacts than the proposed project. However, project impacts were found to be less than significant.

# 7.7.11 Transportation and Traffic

This alternative would result in approximately 10,600 average daily trips with 423 AM peak hour and 997 PM peak hour trips. This represents an approximate 50 percent decrease in average daily trips as compared to the proposed project. The proposed project would result in significant impacts to 14 roadway intersections. Six of these intersections would have an LOS worse than "C": Lincoln Avenue and Woodbury Road (#1), Lincoln Avenue and WB I-210 Ramps (#5), Lincoln Avenue and Washington Boulevard (#7), Lincoln Ave/Prospect Blvd & Forest (#9), Windsor Ave & Woodbury Rd (#12), and I-210 WB Ramps & Mountain St (#30). This alternative would proportionately reduce land use intensity to ensure that these six intersections operate at a LOS C or better in future year 2022. However, traffic impacts would remain significant and unavoidable.

# 7.7.12 Utilities and Service Systems

Utilities and service system demands would decrease by approximately half compared to the proposed project. Therefore, this alternative would have less impact on utilities and service systems than the proposed project.

## 7.7.13 Conclusion

This alternative is environmentally superior to the proposed project in seven of the twelve resource areas analyzed in Chapter 5 (air quality, energy, GHG emissions, noise, public services, transportation and traffic, and utilities and service systems); neutral in two resource areas (hazards and hazardous materials and hydrology/water quality); and inferior in three areas (aesthetics, GHG emissions, and land use).

This alternative would reduce impacts related to construction and operation, and meet the project objectives described in Section 7.1.2 and Section 3.2 but not to the same extent as the proposed project. While the impacts would be reduced, significant unavoidable impacts related to air quality, GHG emissions, noise and traffic would remain. Similar mitigation measures as the proposed project would be required.

## 7.8 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires a lead agency to identify the "environmentally superior alternative" and, in cases where the "No Project" Alternative is environmentally superior to the proposed project, the environmentally superior development alternative must be identified. Table 7-1 shows a comparison of the environmental effects of the alternatives to the proposed project. As shown, the following alternative has been identified as "environmentally superior" to the proposed project:

Increased Residential/Reduced Retail Development Alternative

The Increased Residential/Reduced Retail Development Alternative would lessen impacts to air quality, GHG emissions, noise, population/housing, public services, transportation/traffic, and utilities and service systems. The remaining impacts related to aesthetics, energy, hazards and hazardous materials, hydrology/water quality and land use are generally the same as the proposed project.

The Increased Residential/Reduced Retail Development Alternative would meet all of the project objectives, except that it would not meet Objective 4 to the same degree as the project. The reduction in retail square footage would not facilitate opportunities to provide neighborhood-oriented retail (Objective 4) to the same degree.

Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts." [Guidelines Sec. 15126.6(c)]

Table 7-1 Comparison of Alternatives to the Proposed Project

Environmental Resource Area Project		No Project/Existing General Plan Alternative	Increased Residential/Reduced Retail Development Alternative	Increased Office/Reduced Retail Development Alternative	Reduced Intensity Alternative	
Aesthetics	LTS	+	0	0	+	
Air Quality	S/U	-	-	-	-	
Energy	LTS	0	0	0	-	
GHG	S/U	-	-	-	-	
Hazards and Hazardous Materials	LTSM	0	0	0	0	
Hydrology and Water Quality	LTSM	0	0	0	0	
Land Use	LTS	+	0	0	+	
Noise	S/U	-	-	-	-	
Population/Housing	LTS	-	-	0	+	
Public Services	LTS	-	-	0	-	
Transportation and Traffic	S/U	-	-	-	-	
Utilities and Service Systems	LTSM	-	-	0	-	



LTS – Less Than Significant

LTSM – Less Than Significant with Mitigation

 $S/U-Significant\ and\ Unavoidable \\ (+)=Impact\ considered\ greater\ when\ compared\ with\ the\ proposed\ project.$ 

<sup>(0)</sup> = Impact considered neutral when compared with the proposed project.

<sup>(-) =</sup> Impact considered lesser when compared with the proposed project.

7.	Alternatives	to	the	Pro	posed	Proj	ect
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