

4.0 ALTERNATIVES

INTRODUCTION

California Environmental Quality Act (CEQA) Guidelines require an EIR to describe a range of reasonable alternatives to the project, or to the location of the project, “which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project,” and to “evaluate the comparable merits of the alternatives.”¹The analysis of alternatives shall focus on alternatives “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 project objectives, or would be more costly.”²

The selection and discussion of alternatives is intended to foster meaningful public participation and informed decision making. An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative. The *State CEQA Guidelines* also require the analysis of a no project alternative, and the identification of the environmentally superior alternative. Where the environmentally superior alternative is the no project alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.”³

In addition, the *State CEQA Guidelines* require an EIR to identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency’s determination.⁴

Accordingly, several alternatives that might avoid or substantially lessen project impacts were considered. Some alternatives were initially considered but rejected as infeasible. These are briefly discussed below. Two alternatives were selected for further analysis, as detailed below.

Case law suggests that the discussion of alternatives need not be exhaustive and that alternatives be subject to a construction of reasonableness. The impacts of the alternatives may be discussed in less detail than the significant effects of the project proposed.⁵

¹ *State CEQA Guidelines* Section 15126.6 (a)

² *State CEQA Guidelines* Section 15126.6 (b)

³ *State CEQA Guidelines* Section 15126.6(e)(2)

⁴ *State CEQA Guidelines* Section 15126.6(c)

⁵ *State CEQA Guidelines* section 15126.6(d)

PROJECT OBJECTIVES

The alternatives to the proposed project ultimately selected for analysis in this EIR were developed to avoid or substantially lessen one or more of the significant environmental impacts associated with the proposed project, while still attaining most of the basic objectives of the project. The following are objectives for the proposed project:

- Provide affordable housing opportunities in the City of Pasadena.
- Provide high quality neighborhood park space in west Pasadena.
- Implement the vision of the reuse plan that was adopted by the City Council and approved by the Department of Defense.

SELECTION OF ALTERNATIVES FOR ANALYSIS

According to the *State CEQA Guidelines*, the discussion of alternatives should focus on alternatives to a project or its location that can feasibly avoid or substantially lessen the significant effects of the project. The *State CEQA Guidelines* indicate that the range of alternatives included in this discussion should be sufficient to allow decision makers a reasoned choice. The alternative discussion should provide decision makers with an understanding of the merits and disadvantages of these alternatives.

Section 3.0, Environmental Impact Analysis, of this EIR concludes that proposed project implementation would result in significant and unavoidable environmental impacts. These impacts include:

- The demolition of historical resources as defined in *State CEQA Guidelines*, Section 15064.5
- One street segment impact on Westminster Drive

In response to these significant impacts, the City of Pasadena developed and considered several alternatives to the project. These alternatives include:

Alternative 1 – No Project Alternative

The No Project Alternative assumes that the demolition of the existing structures and reuse of the project site would not occur. The site would remain vacant.

Alternative 2 - Reuse of Existing US Army Reserve Center Structure Alternative

The Reuse Alternative would maintain and reuse the existing US Army Reserve Center (USARC) building. The building would be rehabilitated to accommodate housing on the project site. The layout

would generally be similar to the proposed project, with access to the homes being provided off Westminster Drive and access to the park being provided on Arroyo Boulevard.

Alternatives Considered But Not Evaluated In Detail

The *State CEQA Guidelines* require an EIR to identify any alternatives that were considered by the lead agency but were rejected as infeasible and briefly explain the reasons underlying the lead agency's determination. Section 15126.6(c) of the *State CEQA Guidelines* states the following:

The EIR should identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination...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.

The analysis of alternatives started with an identification of a number of potential alternatives to the proposed project which would increase the City's affordable housing stock and parkland acreage while also receiving support from the surrounding community and encompassing the potential to reduce or eliminate the project's significant environmental impacts.

In accordance with Army policy, the City screened proposals for the property by soliciting notices of interest from state and local governments, representatives of the homeless, and other interested parties, as required by the Federal Property Administrative Services Act of 1949, the Base Closure Community Redevelopment and Homeless Assistance Act of 1994, and the Redevelopment and Homeless Assistance Act of 1994. The process for redevelopment of the site began in 2006. Eleven proposals for redevelopment of the site were received ranging from recreational use of the site to high-density housing, including six housing developments, two schools, and three multi-purpose proposals combining outdoor recreation uses with an art academy, a float building facility for the Tournament of Roses, and a public safety training facility for the City of Pasadena. Of the 11 proposals, four were selected by the Planning Commission as finalists for further consideration. The four alternatives were considered but rejected as infeasible and are discussed below. One additional alternative was considered during the scoping process, but rejected and is discussed below.

Arroyo Center for Art and the Environment

The Arroyo Center for Art and the Environment alternative would repurpose the existing structures on the project site as an art museum and academy, a library of Arroyo history, and a center for environmental education. Improvements to the buildings would include state-of-the-art energy and environmental design and LEED (Leadership in Energy & Environmental Design) certification.

This proposal would be in compliance with the West Gateway Specific Plan and would be conditionally permitted under the current zoning for the site. The open space would be preserved for parkland and the buildings would be operated by the Arroyo Seco Foundation and the California Art Club through an agreement with the City.

While this alternative would eliminate the need to demolish any of the existing structures, the alternative would not meet any of the most basic and fundamental project objectives of providing housing ownership opportunities that will be affordable for very low-, low-, and moderate-income households. In addition, it was not selected as the preferred alternative by the Army, thus the alternative would violate the agreement between the City of Pasadena and the Defense Base Closure and Realignment Commission (DBCRC). For these reasons, the Arroyo Center for Art and the Environment Alternative was deemed an infeasible alternative for the proposed project.

City of Pasadena

The City of Pasadena alternative seeks to provide both a regional public safety training facility in the existing structures and new park/open space opportunities on the remainder of the site. This use would be in compliance with the West Gateway Specific Plan (WGSP) and would be conditionally permitted under the existing zoning. The land would be transferred to the City under a Public Benefit Conveyance for parkland and/or homeland security. It is believed that Homeland Security dollars could be secured for facility renovation. While the alternative would eliminate the need to demolish any of the existing structures, similar to the Arroyo Center for Art and Environment Alternative this alternative would not meet any of the most basic and fundamental project objectives of providing housing ownership opportunities that will be affordable for very low-, low-, and moderate-income households. In addition, it was not selected as the preferred alternative by the Army, thus if the alternative would violate the agreement between the City of Pasadena and the Defense Base Closure and Realignment Commission. For these reasons, the City of Pasadena Alternative was deemed an infeasible alternative for the proposed project.

Habitat for Humanity

The initial alternative submitted by Habitat for Humanity included 22 attached single-family homes leaving the remainder of the project site for either public parkland or the development of market rate single-family homes. The bungalows would be constructed through a sweat equity program and sold at affordable rates up to 80 percent of area median income.

While the alternative included affordable housing and public parkland the surrounding community expressed concern over the number of housing units and the effects the alternative would have on the

neighborhood. Both the City and US Army included community support as a vital component of the approved project. For this reason, the initial Habitat for Humanity Alternative was deemed an infeasible alternative for the proposed project.

Moule and Polyzoides

A "new urbanism," approach was proposed which would have included 20 single-family homes (all which would be sold at a market rate), three affordable units, and a 1.75-acre community park. The alternative would require a zone change and Specific Plan Amendment for a Planned Unit Development (PD) that would allow flexibility from the current zoning and development standards for the site. The land would be purchased by Moule & Polyzoides at market rate, as assessed at the time of transfer, directly from the Department of Defense. While this proposal was withdrawn by the applicant before being considered by City Council, the alternative would not meet one of the two of the project's objectives by providing a minimal number of affordable housing units, and not being consistent with the WGSP and the neighborhood environment. For this reason, the Moule and Polyzoides Alternative was deemed an infeasible alternative for the proposed project.

Conclusion

As described above, the City began the process for acquisition of the site from the Army in 2006. Because the four alternatives discussed above are inconsistent with the Army's preferred alternative, and the Army has evaluated the preferred alternative (reuse of the Desiderio site) in accordance with National Environmental Policy Act (NEPA) guidelines, selection of an alternative inconsistent the Army's preferred alternative would likely result in a need for the Army to conduct additional environmental analysis. Due to the time and expense associated with such an undertaking, it is unlikely the Army would continue to pursue options with the City if that were the case. Therefore, the above alternatives were rejected as infeasible as they are inconsistent with the Army's preferred alternative. Therefore, these alternatives were eliminated from further consideration.

No Parking/Natural Area Alternative

A No Parking/Natural Area Alternative was considered. This alternative would eliminate parking from the proposed project. The park would be maintained as a natural area with no irrigation, tot lot, open turf area, walkways, picnic tables, benches, ADA compliant play equipment, ADA compliant drinking fountains, and or other amenities. Some minimal amenities such as security lighting and waste and recycling receptacles could be provided. This Alternative would also include the nine single-family homes in a courtyard formation. This alternative was eliminated from consideration as it would not avoid or substantially lessen any of the significant effects associated with the project. In particular, the inclusion

of the nine single-family homes would still result in a street segment impact on Westminster Drive and the demolition of the park would continue to result in a significant impact to an eligible historic resource. Therefore, as this alternative would not reduce any significant impacts associated with the proposed project, this alternative was eliminated from further consideration.

ANALYSIS METHODOLOGY

Each of the alternatives selected for analysis is evaluated in sufficient detail to determine whether its overall environmental impacts would be less, similar, or greater in comparison to the impacts of the proposed project. The impact analyses sections for the proposed project set forth in **Section 3.0** of this EIR include project design features and mitigation measures that reduce the environmental impacts of the proposed project. The analysis assumes that equally effective project design features and mitigation measures would apply to the alternatives.

The analysis under each Alternative includes the following:

- An evaluation of the environmental impacts anticipated to occur for each environmental issue analyzed in **Section 3.0** of this EIR and a determination as to the significance of those impacts. This discussion also includes an analysis of whether the Alternatives would avoid or substantially lessen any of the significant environmental impacts associated with the proposed project. Where the impacts of the alternative and the proposed project were roughly equivalent the comparative impact is said to be similar.
- A summary of the comparative impacts across all of the environmental issues.

COMPARATIVE IMPACT ANALYSIS

Alternative 1 – No Project

Section 15126(2)(4) of the *State CEQA Guidelines* requires evaluation of the No Project Alternative. As described in the *State CEQA Guidelines*, the purpose of describing and analyzing the No Project Alternative is to allow decision makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project. Therefore, as required by the *State CEQA Guidelines*, the analysis must examine the impacts that might reasonably be expected to occur in the foreseeable future if the proposed project was not approved. Under the No Project Alternative, the project site would remain in its abandoned state and no improvements would be made.

This No Project analysis discusses the existing conditions at the time the Notice of Preparation was prepared as well as what would be reasonably expected to occur in the foreseeable future if the project was not approved.

Cultural Resources

Under the No Project Alternative, demolition of the USARC building would not occur. The project site would remain as is, and no development would occur. This alternative would avoid the significant impact associated with the project related to the demolition of an eligible historic resource. Although the site is no longer in use by the Army, it is in limited use by the City of Pasadena Fire Department to conduct training exercises. Under this scenario, the Fire Department would continue to use the project site, although it is not expected that the site would remain largely vacant and fall into disrepair. Nonetheless, this alternative would not result in the demolition of the Desiderio USARC building. Therefore, impacts related to cultural resources would be reduced with this alternative compared to the proposed project.

Hazards and Hazardous Materials

Under the No Project Alternative, no construction or demolition activities would occur and there would be no potential for the release of hazardous materials into the environment. In addition, potentially hazardous materials would not be stored or used on the project site. Therefore, potential hazardous materials impacts associated with the No Project Alternative would be less than the proposed project.

Noise

Under the No Project Alternative, no construction or demolition activities would occur. In addition, no new noise sources would be generated including homes or a park, therefore noise impacts associated with the No Project Alternative would be lesser than the proposed project.

Traffic

Under this alternative, no uses would generate trips on the project site. As no new trips would be generated, this alternative would avoid the significant street segment impact on Westminster Drive caused by the project. Impacts under the No Project Alternative would be less than the proposed project.

Relationship to the Project Objectives

This alternative would not attain the following project objectives:

- Provide affordable housing opportunities in the City of Pasadena
- Provide high quality open space opportunities in West Pasadena
- Implement the vision of the reuse plan that was adopted by the City Council and approved by the Department of Defense

Alternative 2 – Reuse of USARC Structure

Under Alternative 2, the existing USARC building would be maintained and reused. The building would be rehabilitated to accommodate housing on the project site. Only the main 22,152-square-foot USARC building would be maintained; the three additional buildings, the Organizational Maintenance Shop (OMS), the storage building, and the HAZMAT shed would be demolished to accommodate the proposed park. Due to the building's eligibility for listing on the National Register of Historic Places, all rehabilitation would be required to occur in accordance with the Secretary of the Interior's Standards for redevelopment. Due to the specialized nature of such rehabilitation, it is unlikely Habitat for Humanity would be involved. The park would be constructed on the remainder of the site and parking would be provided similar to the proposed project. The layout would generally be similar to the proposed project, with access to the homes being provided off Westminster Drive and access to the park being provided on Arroyo Boulevard.

Cultural Resources

Under Alternative 2, the existing USARC building would be maintained and reused to accommodate affordable housing. The reuse of the building could eliminate the significant impact identified with demolition of the USARC building. However, the City would be required to coordinate with the State Historic Preservation Office (SHPO) to determine if the proposed reuse would be acceptable and would retain enough of the character-defining feature to maintain the building as eligible for listing on the National Register. It is possible the changes would need to be so substantial that the building would no longer be eligible. Without detailed plans or input from SHPO it would be difficult to determine the potential for this impact to be reduced. However, as the purpose of this alternative is to maintain the historic building, it is assumed the City could implement the necessary steps and achieve a reuse of the building that would satisfy the Secretary of the Interior's Standards. Further, past practice has indicated that the adaptive reuse of historic buildings for residential uses can be achieved without losing the building's historic status. Therefore, cultural resources impacts would be reduced Alternative 2.

Hazards and Hazardous Materials

Alternative 2 would result in generally the same uses as with the proposed project. Remediation of asbestos-containing materials (ACM) and lead based paint (LBP) would need to occur in accordance with state and federal requirements. Although the project site is not currently listed on any hazardous materials listing site, past uses have included hazardous materials. As such, remediation would be necessary. Similar to the proposed project, with appropriate mitigation, impacts would be less than significant.

Noise

No significant noise impacts were identified with the proposed project. Under Alternative 2, the project site would be developed with similar uses as with the proposed project. The USARC building would be reused for housing and a park would be constructed on the site. This Alternative would also be expected to result in similar construction noise. As uses would be generally the same with the proposed project and Alternative 2, impacts would be similar.

Traffic

Trips associated with Alternative 2 would be similar to the proposed project, as both would result in a park and housing on the project site. The amount of housing would be limited to nine units to be consistent with the proposal to the Army. A driveway would be constructed to provide access to the project site via Westminster drive. Parking for the park would be provided via Arroyo Boulevard. As the proposed project and Alternative 2 would result in approximately the same number of trips, impacts would remain significant and unavoidable on Westminster Drive.

Relationship to Project Objectives

Alternative 2 would reduce the significant impact associated with the demolition of the USARC building. However, this alternative would not achieve the following project objectives:

Alternative 2 would not achieve the City's desire for visual compatibility between the project site and the surrounding area. The existing USARC building is visually inconsistent with the nearby single-family homes and historic resources, as this building would be maintained on the site, the above project objective would not be achieved.

ENVIRONMENTALLY SUPERIOR ALTERNATIVE

State CEQA Guidelines Section 15126.6(e)(2) requires that an "environmentally superior" alternative be selected among the alternatives that are evaluated in the EIR. In general, the environmentally superior Alternative is the alternative that would be expected to generate the fewest adverse impacts. If the No Project Alternative is identified as environmentally superior, then another environmentally superior alternative shall be identified among the other alternatives. **Table 4.0-1** summarizes the effects of the alternatives.

The No Project Alternative would not create any new impacts related to transportation, air quality, greenhouse gas emissions, recreation, land use, and noise. Therefore, the No Project Alternative would be environmentally superior to the proposed project. However, *State CEQA Guidelines* Section 15126.6(e)(2)

states if the environmentally superior alternative is the No Project Alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.

Alternative 2 – Reuse USARC Structure Alternative could reduce the significant impact associated with the loss of a eligible historic resource. Therefore, Alternative 2 is the environmentally superior alternative. However, as stated above, Alternative 2 would not achieve the project’s objective of implementing the vision of the reuse plan that was adopted by the City Council and approved by the Department of Defense. If the City were to adopt Alternative 2 as the preferred alternative, it would not be consistent with the agreement between the City and the Army on the transfer of the Desiderio site. As a result, the Army could decide to dispose of the site through a different means (other than transferring ownership to the City). Further, of the development proposals submitted to the City, only one included the repurpose of the building, and it did not include reuse for residential, but instead as an “arts center.” The arts center alternative was rejected. To find a suitable developer with the necessary skills to adaptively reuse the building, and to conduct the necessary coordination with SHPO (who has already signed off on the demolition of the structure) could take years, as well as additional funding. During that time, the building would remain, largely unused, and would not provide any community benefits to the City. Due to the additional costs associated with seeking a plan to adaptively reuse the structure, and the costs and time associated with gaining the necessary approvals from the Army and SHPO, and the inability of this alternative to meet the basic project objectives, as well as the possibility that the Army could chose to dispose of the USARC through other means if the vision of the existing agreement is not achieved, Alternative 2 would not be feasible for the City to implement.

COMPARISON OF ALTERNATIVES

Table 4.0-1 summarizes the effects of the alternatives.

**Table 4.0-1
Comparison of Alternatives to the Proposed Project**

Environmental Issue Area	No Project	Reuse Alternative
Cultural Resources	Less, Less than significant	Less, could reduce significant impact related to demolition of USARC
Hazards/Hazardous Materials	Less	Similar, Less than significant
Noise	Less	Similar, less than significant
Traffic	Less, Less than significant	Similar, still significant

Source: Impact Sciences, 2013