

7.0 ALTERNATIVES

INTRODUCTION

This section of the Environmental Impact Report (EIR) provides a comparative analysis of the merits of alternatives to the proposed project pursuant to Section 15126.6 of the California Environmental Quality Act (CEQA) Guidelines, as amended. The purpose of the alternatives analysis is to explain potentially feasible ways to avoid or minimize significant effects of the project. According to the State CEQA Guidelines, the EIR need only examine in detail those alternatives that could feasibly meet most of the basic objectives of the project. When addressing feasibility, the State CEQA Guidelines Section 15126.6 states that “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, jurisdictional boundaries, and whether the applicant can reasonably acquire, control or otherwise have access to alternative sites.” The State CEQA Guidelines also specify that the alternatives discussion should not be remote or speculative, and need not be presented in the same level of detail as the assessment of the project.

Therefore, based on the State CEQA Guidelines, several factors need to be considered in determining the range of alternatives to be analyzed in an EIR and the level of analytical detail that should be provided for each alternative. These factors include (1) the nature of the significant impacts of the project, (2) the ability of alternatives to avoid or lessen the significant impacts associated with the project, (3) the ability of the alternatives to meet the objectives of the project, and (4) the feasibility of the alternatives. These factors would be unique for each project.

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 4.0, Environmental Impact Analysis, of this EIR concludes that proposed project implementation would result in significant and unavoidable environmental impacts. These impacts include short-term air quality; noise and groundborne vibration impacts during construction; and long-term noise, traffic, and recreation impacts during operation.

In response to these impacts, the Glendale Redevelopment Agency (Agency) identified and considered several alternatives to the proposed project to determine if these alternatives could avoid or substantially lessen these significant impacts. These alternatives included the no-project alternative, reuse of the vacant

commercial building, development of the proposed project at reduced density on the project site, development of the project site with a traditional residential unit mix residential only.

ALTERNATIVES CONSIDERED BUT NOT EVALUATED IN DETAIL

Section 15126.6(c) of the *State CEQA Guidelines* states that an EIR should briefly describe the rationale for selecting the alternatives to be discussed and the reasons for eliminating alternatives from detailed consideration in an EIR. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR is failure to meet most of the basic Project objectives, infeasibility, or inability to avoid or substantially reduce significant environmental impacts. Provided below are the reasons for not providing detailed evaluation of some of the alternatives initially developed by the Agency.

Off-Site Alternative

An alternative site would involve the development of the proposed project at a different location. Given that neither the project applicant nor the Agency owns or controls any other property in the vicinity of the project site, the applicant's ability to find and purchase an alternative site on which to develop the proposed project is considered speculative. In addition, development on an alternative site may not meet the proposed project objectives. Lastly, the development of the same uses at a different location would result in similar air quality, noise, groundborne vibration impacts during construction, and noise, traffic, and recreation impacts during operation. Thus, the selection of an alternative site would not avoid significant impacts.

As indicated in CEQA 15126.6(c), "among factors that may be used to eliminate alternatives from detailed consideration in an EIR are (i) failure to meet most of the project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts." As discussed above, the relocation of the Project to an alternative site would not be feasible because the obtaining of an alternative site is considered speculative and because development on an alternative site would not avoid or substantially lessen any of the significant effects of the proposed project. Therefore, this alternative has been eliminated from detailed consideration within this EIR.

ALTERNATIVES EVALUATED IN DETAIL

As discussed above, the Agency identified several alternatives for analysis in this EIR to determine if these alternatives could avoid or substantially lessen the significant impacts of the proposed project and meet the basic project objectives. The following objectives for the proposed project are listed in **Section 3.0, Project Description**. The objectives of the proposed project are to:

- support the objectives of the Redevelopment Plan to eliminate blight and revitalize the Central Glendale Redevelopment Project Area;

- provide a distinctive landmark project and, at the same time, create a contemporary urban context that responds to the special character of downtown Glendale;
- Create a diversity of residential and urban uses to activate and strengthen the vitality of downtown Glendale;
- Provide housing opportunities, pursuant to the Agency's policy, in an urban setting in close proximity to employment opportunities, public transportation, public facilities, and goods and services;
- Provide a high-quality and functionally integrated housing and retail-commercial development that is distinctive and contributes to the creation of a downtown Glendale residential base;
- Utilize architectural design, lighting, and landscape materials to give the project site a distinctive and pleasing appearance;
- Focus development of high-density residential and retail-commercial uses on a site adjacent to compatible land uses;
- Provide employment opportunities;
- Provide new and expanded entertainment uses in Downtown Glendale; and
- Provide new and expanded restaurant uses in Downtown Glendale.

Section 4.0, Environmental Impact Analysis, of this EIR concludes that proposed project implementation would result in some significant environmental impacts. These include short-term air quality, noise, and groundborne vibration impacts during construction and long-term noise, traffic, and recreation impacts during operation. No feasible measures are available that would mitigate these impacts to a less than significant level. Based on the environmental analysis, alternatives were developed which would provide decision makers with a reasonable range of alternatives that would eliminate or reduce the impacts of the proposed project. A list of the alternatives selected for evaluation in this analysis is provided below.

- Alternative 1 – No Project/No Development
- Alternative 2 – Reuse of Vacant Commercial Building
- Alternative 3 – Reduced Density (50 Percent Reduction)
- Alternative 4 – Traditional Residential Unit Mix
- Alternative 5 – Residential Only

Alternative 1 – No Project/No Development Alternative

The No Project/No Development Alternative is required to be evaluated by Section 15126(2)(4) of the *State CEQA Guidelines*. As required by the *State CEQA Guidelines*, the analysis must examine the impacts which might occur if the site is left in its present condition, as well as what may reasonably be expected to occur in the foreseeable future if the proposed project were not approved, based on current plans and consistent with available infrastructure and community services.

Under the No Project/No Development Alternative, the project site would not be developed with additional uses, and would remain in its current state. The one vacant commercial building would remain on the project site and not be utilized. None of the impacts associated with project construction would occur if the No Project/No Development Alternative were selected, neither would any potential long term impacts associated with project operation. No short-term air quality, noise, or groundborne vibration impacts would occur during construction. No long-term shade and shadow, noise, traffic, or recreation impacts could occur during operation as a result of this alternative. This alternative is environmentally superior to the proposed project for these reasons.

Relationship of Alternative to Project Objectives

This alternative would not meet the following objectives for the proposed project:

- Support the objectives of the Redevelopment Plan to eliminate blight and revitalize the Central Glendale Redevelopment Project Area;
- Provide a distinctive landmark project and, at the same time, create a contemporary urban context that responds to the special character of downtown Glendale;
- Create a diversity of residential and urban uses to activate and strengthen the vitality of downtown Glendale;
- Provide housing opportunities, pursuant to the Agency's policy, in an urban setting in close proximity to employment opportunities, public transportation, public facilities, and goods and services;
- Provide a high-quality and functionally integrated housing and retail-commercial development that is distinctive and contributes to the creation of a downtown Glendale residential base;
- Utilize architectural design, lighting, and landscape materials to give the project site a distinctive and pleasing appearance;
- Focus development of high-density residential and retail-commercial uses on a site adjacent to compatible land uses;
- Provide new and expanded entertainment uses in Downtown Glendale; and

- Provide new and expanded restaurant uses in Downtown Glendale.

Alternative 2 – Reuse of Vacant Commercial Building

Under the Reuse of Vacant Commercial Building Alternative, the project site would not be developed with additional uses, and would remain in its current state. The one vacant commercial building would remain on the project site and would be used by a new retail commercial vendor. Visitor parking for this new commercial vendor in the number of 170 spaces would be provided in the existing Glendale Marketplace parking garage. None of the impacts associated with project construction would occur if the Reuse of Vacant Commercial Building Alternative were selected. No short-term air quality, noise, or groundborne vibration impacts would occur during construction. Potential long-term shade and shadow, noise, traffic, or recreation impacts could occur during operation as a result of this alternative. This alternative is environmentally superior to the proposed project for these reasons.

Relationship of Alternative to Project Objectives

This alternative would not meet the following objectives for the proposed project:

- Provide a distinctive landmark project and, at the same time, create a contemporary urban context that responds to the special character of downtown Glendale;
- Create a diversity of residential and urban uses to activate and strengthen the vitality of downtown Glendale;
- Provide housing opportunities, pursuant to the Agency's policy, in an urban setting in close proximity to employment opportunities, public transportation, public facilities, and goods and services;
- Provide a high-quality and functionally integrated housing and retail-commercial development that is distinctive and contributes to the creation of a downtown Glendale residential base;
- Utilize architectural design, lighting, and landscape materials to give the project site a distinctive and pleasing appearance;
- Focus development of high-density residential and retail-commercial uses on a site adjacent to compatible land uses;
- Provide new and expanded entertainment uses in Downtown Glendale; and
- Provide new and expanded restaurant uses in Downtown Glendale.

Alternative 3 – Reduced Density Alternative (50 Percent Reduction)

The Reduced Density Alternative considers development of the entire project site with a reduced residential density. This alternative is considered in order to reduce significant short-term air quality, noise, and groundborne vibration impacts during construction, and long-term noise, traffic, and recreation impacts during operation by reducing the amount of development. This alternative would include 124 residential units and a total of 26,000 square feet of restaurant and entertainment commercial uses. This reduction in residential units would reduce the proposed building by two stories. Under this alternative, the on-site existing vacant building would be demolished and removed. The layout for the land uses under this alternative would change. Residential parking would be reduced in this alternative from 250 stalls to 125 stalls in the subterranean parking garage to be located on the project site. By reducing the amount of development, the construction duration for this alternative would also be reduced. In addition, a reduction in the amount of residential units would reduce the amount of population generated under this alternative, which would reduce the demand for parks and recreational facilities.

Aesthetics

The height of the structures would be reduced to three stories under Alternative 3. Similarly, all visual impacts under this alternative would be incrementally reduced compared to the proposed project. Since impacts to visual resources associated with the proposed project would be less than significant, the impact associated with Alternative 3 would not be substantially less than the proposed project.

Unlike the proposed project, Alternative 3 would result in less than significant shade and shadow impacts since it would not shade the adjacent residential uses to the east for more than 2 hours.

Air Quality

Construction activities (e.g., equipment use assumptions) under Alternative 3 would be similar to those of the proposed project on a daily basis but may occur over a shorter period, due to the reduced development associated with Alternative 3. As with the proposed project, the increase in emissions resulting from Alternative 3 would exceed daily thresholds recommended by the South Coast Air Quality Management District (SCAQMD). However, emissions resulting from both the proposed project and Alternative 3 would not exceed localized significance criteria recommend by the SCAQMD. As construction emissions would exceed daily thresholds recommended by SCAQMD, construction emissions generated by Alternative 3 would be significant. In terms of severity, Alternative 3 would be environmentally superior to the proposed project due to the length of construction. However, the difference between emissions between the proposed project and Alternative 3 would not be substantial.

Like the proposed project, Alternative 3 would not generate daily operational emissions of volatile organic compounds (VOC), oxides of nitrogen (NO_x), carbon monoxide (CO), sulfur oxides (SO_x), and particulate matter less than 10 microns in diameter (PM₁₀) and 2.5 microns in diameter (PM_{2.5}) that would exceed the thresholds of significance recommended by the SCAQMD. Given that neither the proposed project nor Alternative 3 would result in a significant impact with regard to operational air quality, impacts associated with Alternative 3 would not be substantially less than the proposed project.

Implementation of the proposed project would not expose sensitive receptors near roadway intersections to substantial pollutant concentrations. Alternative 3 would generate less vehicular traffic to and from the project site during the AM and PM peak-hour periods than the proposed project when localized concentrations of CO are the highest. Neither the proposed project nor Alternative 3 would result in a significant impact with regard to exposure to sensitive receptors. Therefore, impacts associated with Alternative 3 would not be substantially less than the proposed project.

Individual projects that exceed the SCAQMD-recommended daily thresholds for project-specific impacts are considered to cause a cumulatively considerable increase in emissions for those pollutants for which the basin is in nonattainment. As Alternative 3, like the proposed project, would exceed daily thresholds recommended by the SCAQMD during construction, Alternative 3 would generate a cumulatively considerable contribution to air pollutant emissions during construction. Therefore, like the proposed project, Alternative 3 would have a significant cumulative impact with respect to this criterion, and impacts associated with Alternative 3 would not be substantially less than the proposed project.

Population and Housing

The proposed project is not anticipated to induce substantial population growth in an area directly or indirectly. Alternative 3 would be a smaller project in terms of density and residents as compared to the proposed project, and would therefore result in similar less than significant impacts in regards to inducing substantial population growth in an area.

The project site currently contains a vacant commercial retail store that was formerly occupied by electronics retailer Circuit City. Therefore the proposed project and Alternative 3 would not displace any number of existing housing or any people requiring replacement housing to be built elsewhere.

All of the residents anticipated to occupy the project site after development of the proposed project are within the population and household projects for the City of Glendale. Therefore, under Alternative 3 which is smaller and less dense than the proposed project, the residents to occupy the project site would also be within the projected population and household growth projection for the City of Glendale.

Land Use and Planning

Alternative 3 would establish the same mix of retail-commercial and residential uses on the project site that are allowed being proposed in the project. The intensity of the and the residential uses would be reduced by 50 percent under this alternative and would not conflict with the use or density standards in the General Plan or Zoning Code.

Like the proposed project, this alternative would not conflict with any of the goals, objectives, or policies of the Glendale General Plan. This alternative would result in the redevelopment of the project site and the development of new commercial uses in southern Glendale, which are presently served by existing utilities and public services. As a result, neither this alternative nor the proposed project would conflict with the goals of the Redevelopment Plan. Neither the proposed project nor Alternative 3 would result in a significant impact with regard to land use. Given that neither the proposed project nor Alternative 3 would result in a significant impact, impacts associated with Alternative 3 would not be substantially less than the proposed project.

Noise

Development activities associated with the proposed project and Alternative 3 during construction such as demolition, earthmoving, and construction of on-site infrastructure would involve the use of heavy equipment, such as backhoes, dozers, loaders, concrete mixers, forklifts, and cranes. Under either the proposed project or Alternative 3, these construction equipment sources would cause significant noise and groundborne vibration impacts. These impacts could be reduced but not eliminated with either development scenario through the implementation of mitigation measures recommended for the proposed project. In addition, the construction duration associated with Alternative 3 would be shorter when compared to the proposed project due to the reduced density of the alternative. However, construction duration would not be shortened to the extent that noise and groundborne vibration impacts would be substantially reduced. As a result, construction of the proposed project or this alternative would both result in short-term significant and unavoidable impacts. Therefore, Alternative 3 would not avoid or substantially lessen a significant noise impact.

In addition, noise generated by construction of the proposed project or Alternative 3 could combine with construction activities associated with related projects in the area, thus resulting in a significant cumulative noise impact. As with the proposed project alone, these impacts could be reduced but not eliminated through the implementation of mitigation measures recommended for each project. As a result, construction of either the proposed project or Alternative 3 and related projects would result in

short-term significant and unavoidable cumulative impacts. As a result, Alternative 3 would not avoid or substantially lessen a significant impact.

Long-term operational noise generated by traffic under this alternative would decrease compared to the proposed project. This is due to the decrease in the amount of traffic generated by this alternative. However, on average, like the proposed project, this alternative would result in an increase of in the noise levels on roadway segments adjacent to the project site. Any reduction in roadway noise levels would not be noticeable. Although the reduced development of Alternative 3 would create less noise along area roadways, the decrease in noise would not be lessened to the extent that significant impacts would be substantially reduced or avoided.

Public Services

Fire Protection

Alternative 3, like the proposed project, would increase demand on the City of Glendale Fire Department for fire protection services and emergency medical services. Alternative 3, however, would result in fewer calls for service due to the reduced number of residential units. Alternative 3 would result in impacts to the City of Glendale Fire Department, as an increase in staff would be required to adequately serve the project site. Alternative 3, like the proposed project, would contribute tax revenue, which would help fund the Fire Department, and would also be required to incorporate mitigation measures, both of which would reduce impacts to a less than significant level. Given that neither the proposed project nor Alternative 3 would result in a significant impact, impacts to fire associated with Alternative 3 would not be substantially less than the proposed project.

Police Protection

Alternative 3, like the proposed project, would increase demand on the City of Glendale Police Department for calls for service. Alternative 3, however, would result in fewer calls for service due to the reduced amount of commercial and office space. Alternative 3 would result in impacts to the City of Glendale Police Department, as an increase in staff would be required to adequately serve the project site. Alternative 3, like the proposed project, would contribute tax revenue, which would help fund the Police Department, and would also be required to incorporate mitigation measures, both of which would reduce impacts to a less than significant level. Given that neither the proposed project nor Alternative 3 would result in a significant impact, impacts to police associated with Alternative 3 would not be substantially less than the proposed project.

Recreation

Alternative 3, like the proposed project, would result in an increase in use of existing neighborhood and community parks. The City currently has a parkland-to-resident ratio of approximately 1.12 acres of parkland for every 1,000 residents while the City's park planning standard is 6 acres of neighborhood and community parkland per 1,000 residents. Existing park facilities are currently heavily used due to the deficiency in parkland in the City. Both the proposed project and the alternative would be required to pay the development impact fee and the tax increment set-aside over time, which is considered a reasonable means to partially mitigate impacts on park and recreation land and facilities. However, based on a conservative analysis, which takes into account both the prospect that the City/Agency could elect to reduce or suspend the tax increment set-aside in order to focus on other redevelopment priorities, and timing issues, this funding may not be fully provided, and the proposed project or this alternative would have a significant and unavoidable impact on park and recreation land and facilities.

Traffic, Circulation and Parking

Construction activities under Alternative 3 would be similar to those of the proposed project on a daily and peak-hour basis, but may occur over a shorter period, as Alternative 3 includes less development. Construction worker and truck trips would occur along major roadways with some of the trips generated during peak hours; however, construction impacts from either the proposed project or Alternative 3 would be less than significant. As a result, the construction-related traffic impact associated with Alternative 3 would not be substantially less than the proposed project.

Because of the reduction in the residential units, Alternative 3 would generate fewer vehicle trips during both AM and PM peak hours as compared to the proposed project. Because there would be fewer daily (412412 fewer trips) and peak-hour (14040 fewer peak-hour trips) traffic generated with this alternative, impacts would be lessened at the study area intersections. Although the reduced development of Alternative 3 would result in fewer trips along area roadways and intersections, the decrease in trips would not be lessened to the extent that significant impacts would be substantially reduced or avoided.

A parking exception would be required with implementation of Alternative 3 and using the shared parking analysis prepared for the proposed project; this alternative would be sufficiently parked. Neither the proposed project nor Alternative 3 would result in a significant impact with regard to parking. Therefore, the impact associated with Alternative 3 would not be substantially less than the proposed project.

In addition, trips generated by the proposed project or this alternative could combine with trips generated by related projects in the area thus resulting in a significant cumulative impact study area

intersections and roadways. As with the proposed project, mitigation measures are available to reduce the severity of the impacts generated by related projects; however, many of these measures are infeasible due to the loss of sidewalks, trees, and parking due to street widening and conflicts with bus stops, storm drains, or fire hydrants. Therefore, both the proposed project and Alternative 3 would result in significant and unavoidable cumulative traffic impacts and like the proposed project, Alternative 3 would not avoid or substantially lessen a cumulatively significant impact.

Utilities and Services

Water

As with the proposed project, Alternative 3 would result in an increase in water demand. The provision of water as a result of the project implementation would be within the projections of the Glendale Water and Power (GWP). Alternative 3, which would demand less water than the proposed project, would also be within the established GWP projections. Water demand impacts under both Alternative 3 and the proposed project would be less than significant. Neither the proposed project nor Alternative 3 would result in a significant impact. Given that neither the proposed project nor Alternative 3 would result in a significant impact, impacts associated with Alternative 3 would not be substantially less than the proposed project.

Sewer

Alternative 3, like the proposed project, would result in an increase in sewage generation. There is adequate treatment capacity at the Hyperion Treatment Plant to accommodate either Alternative 3 or the proposed project. In addition, sewer lines in the vicinity of the proposed project would be upgraded as part of the City's Tyburn Wastewater Capacity Improvement Project. The City imposes a sewer capacity increase fee on new developments that lead to an increase in the volume of wastewater discharged to the collection system. The alternative's sewage increase to the lines in the Tyburn Flume would be mitigated through payment of the sewer capacity increase fee, as required by the proposed project, and Alternative 3 impacts would be reduced to a less than significant level. Given that neither the proposed project nor Alternative 3 would result in a significant impact, impacts associated with Alternative 3 would not be substantially less than the proposed project.

Solid Waste

Alternative 3, like the proposed project, would result in an increase in the demand for solid waste services. There is adequate landfill capacity at the Scholl Canyon Landfill to accommodate either Alternative 3 or the proposed project. Therefore, impacts under both Alternative 3 and the proposed

project would be less than significant and impacts associated with Alternative 3 would not be substantially less than the proposed project.

Solid waste generated by the proposed project or Alternative 3 would combine with solid waste generated by related projects in Glendale and would be deposited in area landfills. The current capacity of the Scholl Canyon and Puente Hills Landfills, which receive over 90 percent of the City's waste, is adequate to accommodate solid waste disposal needs of either the proposed project or Alternative 3, plus development of all related projects, for at least 10 years, if not longer. The City also utilizes four additional landfills, all of which are currently still accepting materials. These landfills are a part of the County Sanitation Districts of Los Angeles County (CSDLAC), which provides solid waste management for over half the population in Los Angeles County. The CSDLAC is currently in the process of increasing capacity to accommodate future increases in solid waste through the expansion of local landfills and the use of a regional waste-by-rail system and remote landfills. However, these improvements are not yet in place. For, example, waste-by-rail to the Mesquite Landfill in Imperial County will not be completed until 2011/12. Further, there is presently insufficient permitted disposal capacity within the existing system serving Los Angeles County. As a result, either the proposed project or Alternative 3, in combination with other development, could contribute to insufficient permitted disposal capacity by contributing additional solid waste to regional landfills. Therefore, the contribution of the proposed project and Alternative 3 to the cumulative impact would be considered cumulatively considerable, and would be a significant and unavoidable cumulative impact. The impact associated with Alternative 3 would not be substantially less than the proposed project.

Relationship of Alternative to Project Objectives

This alternative would meet the objectives for the proposed project.

Alternative 4 – Traditional Residential Unit Mix

The Traditional Residential Unit Mix Alternative considers development of the entire project site with a traditional residential unit mix (two-bedroom apartments, one-bedroom apartments, and studio apartments) in a project with total square feet equal to the proposed project.

This alternative would propose to construct a project with a blend of studio, one and two-bedroom units along the traditional percentages, rather than the studio and studio loft mix of the original project. The change in mix of products would result in a project of approximately 120 units, with an average unit size over twice the proposed project's average.

This alternative was formulated to reduce the significant air quality, noise, ground borne vibration, traffic, and recreation impacts of the Project by reducing the amount of intensive development. Under

this alternative, all on-site buildings would be demolished and removed. The layout for the land uses under this alternative would be the similar as under the proposed, and would result in the development of 26,000 square feet of restaurant and entertainment commercial uses and 120 residential units. A subterranean level parking garage would still be needed to provide approximately 250 parking spaces for residential uses. The height of the building would remain the same at five stories.

Aesthetics

The height of the structures would remain the same under Alternative 4. Similarly, all visual impacts under this alternative would be incrementally reduced compared to the proposed project. Since impacts to visual resources associated with the proposed project would be less than significant, the impact associated with Alternative 4 would not be substantially less than the proposed project.

As with the proposed project, Alternative 4 would result in significant and unavoidable shade and shadow impacts since it would shade the adjacent residential uses to the east for more than 2 hours.

Air Quality

Construction activities (e.g., equipment use assumptions) under Alternative 4 would be similar to those of the proposed project on a daily basis. As with the proposed project, the increase in emissions resulting from Alternative 4 would exceed daily thresholds recommended by the South Coast Air Quality Management District (SCAQMD). However, emissions resulting from both the proposed project and Alternative 4 would not exceed localized significance criteria recommend by the SCAQMD. As construction emissions would exceed daily thresholds recommended by SCAQMD, construction emissions generated by Alternative 4 would be significant. The emission differences between the proposed project and Alternative 4 would not be substantial.

Like the proposed project, Alternative 4 would not generate daily operational emissions of volatile organic compounds (VOC), oxides of nitrogen (NO_x), carbon monoxide (CO), sulfur oxides (SO_x), and particulate matter less than 10 microns in diameter (PM₁₀) and 2.5 microns in diameter (PM_{2.5}) that would exceed the thresholds of significance recommended by the SCAQMD. Given that neither the proposed project nor Alternative 4 would result in a significant impact with regard to operational air quality, impacts associated with Alternative 4 would not be substantially less than the proposed project.

Implementation of the proposed project would not expose sensitive receptors near roadway intersections to substantial pollutant concentrations. Alternative 4 would generate more vehicular traffic to and from the project site during the AM and PM peak-hour periods than the proposed project when localized concentrations of CO are the highest. Neither the proposed project nor Alternative 4 would result in a

significant impact with regard to exposure to sensitive receptors. Therefore, impacts associated with Alternative 4 would not be substantially less than the proposed project.

Individual projects that exceed the SCAQMD-recommended daily thresholds for project-specific impacts are considered to cause a cumulatively considerable increase in emissions for those pollutants for which the basin is in nonattainment. As Alternative 4, like the proposed project, would exceed daily thresholds recommended by the SCAQMD during construction, Alternative 4 would generate a cumulatively considerable contribution to air pollutant emissions during construction. Therefore, like the proposed project, Alternative 4 would have a significant cumulative impact with respect to this criterion, and impacts associated with Alternative 4 would not be substantially less than the proposed project.

Population and Housing

The proposed project is not anticipated to induce substantial population growth in an area directly or indirectly. Alternative 4 would provide fewer residential units than the proposed project, but would generate more residents than the proposed project. The fewer units and more residents in this alternative would create a much denser project, than the proposed project.

The project site currently contains a vacant commercial retail store that was formerly occupied by electronics retailer Circuit City. Therefore the proposed project and Alternative 4 would not displace any existing housing or require replacement housing to be built elsewhere.

All of the residents anticipated to occupy the project site after development of the proposed project are within the population and household projects for the City of Glendale. Therefore, under Alternative 4 which is smaller, but denser than the proposed project, the total residents would also be within the population and household growth projection for the City of Glendale, consequently impacts would be comparable.

Land Use and Planning

Alternative 4 would establish the same mix of retail-commercial and residential uses on the project site that are proposed for in the project. The intensity of the residential uses would be reduced in terms of the number of residential units, but would be increased in terms of the number of residents and would not conflict with the use or density standards in the General Plan or Zoning Code.

Like the proposed project, this alternative would not conflict with any of the goals, objectives, or policies of the Glendale General Plan. This alternative would result in the redevelopment of the project site and the development of new commercial uses in southern Glendale, which are presently served by existing utilities and public services. As a result, neither this alternative nor the proposed project would conflict

with the goals of the Redevelopment Plan. Neither the proposed project nor Alternative 4 would result in a significant impact with regard to land use. Given that neither the proposed project nor Alternative 4 would result in a significant impact, impacts associated with Alternative 4 would not be substantially less than the proposed project.

Noise

Development activities associated with the proposed project and Alternative 4 during construction such as demolition, earthmoving, and construction of on-site infrastructure would involve the use of heavy equipment, such as a backhoe, dozer, loaders, concrete mixers, forklifts, and cranes. Under either the proposed project or Alternative 4, these construction equipment sources would cause significant noise and groundborne vibration impacts. These impacts could be reduced but not eliminated by implementing the mitigation measures recommended for the proposed project. In addition, the construction duration associated with Alternative 4 would be comparable to the proposed project. Therefore, construction duration would also be comparable to the extent that noise and groundborne vibration impacts would not be substantially reduced. As a result, construction of the proposed project or this alternative would both result in short-term significant and unavoidable impacts. Therefore, Alternative 4 would not avoid or substantially lessen a significant noise impact.

In addition, noise generated by construction of the proposed project or Alternative 4 could combine with construction activities associated with related projects in the area, thus resulting in a significant cumulative noise impact. As with the proposed project alone, these impacts could be reduced but not eliminated through the implementation of mitigation measures recommended for each project. As a result, construction of either the proposed project or Alternative 4 and related projects would result in short-term significant and unavoidable cumulative impacts. As a result, Alternative 4 would not avoid or substantially lessen a significant impact.

Long-term operational noise generated by traffic under this alternative would most likely be higher when compared to the proposed project because although fewer units are proposed in this alternative, more residents are anticipated to occupy the site. These additional residents would generate extra traffic and noise when compared to the proposed project. This alternative would result in an increase in the noise levels on roadway segments adjacent to the project site. Alternative 4 would result in the same significant impacts with respect to noise as would the proposed project, and may result in even more severe impacts.

Public Services

Fire Protection

Alternative 4, like the proposed project, would increase demand on the City of Glendale Fire Department for fire protection services and emergency medical services. Alternative 4 could result in more calls for service due to the increased number of residents as compared to the proposed project. Alternative 4 would result in impacts to the City of Glendale Fire Department, as an increase in staff would be required to adequately serve the project site. Alternative 4, like the proposed project, would contribute tax revenue, which would help fund the Fire Department, and would also be required to incorporate mitigation measures, both of which would reduce impacts to a less than significant level. Given that neither the proposed project nor Alternative 4 would result in a significant impact, to fire protection.

Police Protection

Alternative 4, like the proposed project, would increase demand on the City of Glendale Police Department for calls for service. Alternative 4 would result in impacts to the City of Glendale Police Department, as an increase in staff would be required to adequately serve the project site. Alternative 4, like the proposed project, would contribute tax revenue, which would help fund the Police Department, and would also be required to incorporate mitigation measures, both of which would reduce impacts to a less than significant level. Given that neither the proposed project nor Alternative 4 would result in a significant impact, impacts to police services associated with Alternative 4 would not be substantially less than the proposed project.

Recreation

Alternative 4, like the proposed project, would result in an increase in use of existing neighborhood and community parks. The City currently has a parkland-to-resident ratio of approximately 1.12 acres of parkland for every 1,000 residents while the City's park planning standard is 6 acres of neighborhood and community parkland per 1,000 residents. Existing park facilities are currently heavily used because of the deficiency in parkland in the City. Both the proposed project and the alternative would be required to pay the development impact fee and the tax increment set-aside over time, which is considered a reasonable means to partially mitigate impacts on park and recreation land and facilities. However, based on a conservative analysis, which takes into account both the prospect that the City/Agency could elect to reduce or suspend the tax increment set-aside in order to focus on other redevelopment priorities, and timing issues, this funding may not be fully provided, and the proposed project or this alternative would have a significant and unavoidable impact on park and recreation land and facilities.

Traffic, Circulation and Parking

Construction activities under Alternative 4 would be similar to those of the proposed project on a daily and peak-hour basis, but Alternative 4's impacts may occur over a shorter period. Construction worker and truck trips would occur along major roadways with some of the trips generated during peak hours; however, construction impacts from either the proposed project or Alternative 4 would be less than significant. As a result, the construction-related traffic impact associated with Alternative 4 would not be substantially less than the proposed project.

Because of the increase in the number of residents, Alternative 4 would generate greater vehicle trips during both AM and PM peak hours as compared to the proposed project. Because there would be greater daily and peak-hour traffic generated trips, with this alternative, impacts at study intersections would increase commensurately and traffic impacts would be incrementally more severe under this alternative as compared to the proposed project.

A parking exception would be required with implementation of Alternative 4 and using the shared parking analysis prepared for the proposed project; this alternative would be sufficiently parked. Neither the proposed project nor Alternative 4 would result in a significant impact with regard to parking. Therefore, the impact associated with Alternative 4 would not be substantially less than the proposed project.

In addition, trips generated by the proposed project or this alternative could combine with trips generated by related projects in the area thus resulting in a significant cumulative impact to study area intersections and roadways. As with the proposed project, mitigation measures are available to reduce the severity of the impacts generated by related projects; however, many of these measures are infeasible because street widening would cause the loss of sidewalks, trees, and parking, and conflicts with bus stops, storm drains, or fire hydrants. Therefore, both the proposed project and Alternative 4 would result in significant and unavoidable cumulative traffic impacts, and, like the proposed project, Alternative 4 would not avoid or substantially lessen a cumulatively significant impact.

Utilities and Services

Water

As with the proposed project, Alternative 4 would result in an increase in water demand. Water demand for the proposed project would be within the projections of the Glendale Water and Power (GWP). Alternative 4, which would demand more water than the proposed project, would also be within the established GWP projections. Water demand impacts under both Alternative 4 and the proposed project

would be less than significant. Neither the proposed project nor Alternative 4 would result in a significant impact. Given that neither the proposed project nor Alternative 4 would result in a significant impact, impacts associated with Alternative 4 would not be substantially less than the proposed project.

Sewer

Alternative 4, like the proposed project, would result in an increase in sewage generation. There is adequate treatment capacity at the Hyperion Treatment Plant to accommodate either Alternative 4 or the proposed project. In addition, sewer lines in the vicinity of the proposed project would be upgraded as part of the City's Tyburn Wastewater Capacity Improvement Project. The City imposes a sewer capacity increase fee on new developments that increase wastewater discharged to the collection system. The alternative's sewage increase to the lines in the Tyburn Flume would be mitigated to a less than significant level through payment of the sewer capacity increase fee. Given that neither the proposed project nor Alternative 4 would result in a significant impact, impacts associated with Alternative 4 would not be substantially less than the proposed project.

Solid Waste

Alternative 4, like the proposed project, would result in an increase in the demand for solid waste services. There is adequate landfill capacity at the Scholl Canyon Landfill to accommodate either Alternative 4 or the proposed project. Therefore, impacts under both Alternative 4 and the proposed project would be less than significant and impacts associated with Alternative 4 would not be substantially less than the proposed project.

Solid waste generated by the proposed project or Alternative 4 would combine with solid waste generated by related projects in Glendale and would be deposited in area landfills. The current capacity of the Scholl Canyon and Puente Hills Landfills, which receive over 90 percent of the City's waste, is adequate to accommodate solid waste disposal needs of either the proposed project or Alternative 4, plus development of all related projects, for at least 10 years, if not longer. The City also utilizes four additional landfills, all of which are currently accepting materials. These landfills are a part of the County Sanitation Districts of Los Angeles County (CSDLAC), which provides solid waste management for over half the population in Los Angeles County. The CSDLAC is currently in the process of increasing capacity to accommodate future increases in solid waste through the expansion of local landfills and the use of a regional waste-by-rail system and remote landfills. However, these improvements are not yet in place. For example, waste-by-rail to the Mesquite Landfill in Imperial County will not be completed until 2011/12. Further, there is presently insufficient permitted disposal capacity within the existing system serving Los Angeles County. As a result, either the proposed project or Alternative 4, in combination with other development, could contribute to insufficient permitted disposal capacity by contributing

additional solid waste to regional landfills. Therefore, the contribution of the proposed project and Alternative 4 to the cumulative impact would be considered cumulatively considerable, and would be a significant and unavoidable cumulative impact. The impact associated with Alternative 4 would not be substantially less than the proposed project.

Relationship of Alternative to Project Objectives

This alternative would not meet the following objectives for the proposed project:

- Create a diversity of residential and urban uses to activate and strengthen the vitality of downtown Glendale;
- Provide housing opportunities, pursuant to the Agency's policy, in an urban setting in close proximity to employment opportunities, public transportation, public facilities, and goods and services;
- Focus development of high-density residential and retail-commercial uses on a site adjacent to compatible land uses;

Alternative 5 – Residential Only

The Residential Only Alternative considers development of the entire project site with only residential uses.

This alternative would propose to construct a project with the 248 residential units on levels two through five, no retail space constructed on the ground floor and, in its place, provide parking for the residents on the ground floor. The allotted 170 parking stalls in the adjacent Glendale Marketplace parking structure would not be utilized by the project, and the residential subterranean parking would be reduced to two levels.

This alternative was formulated to reduce the significant air quality, noise, ground borne vibration, traffic, and recreation impacts of the proposed project by reducing the amount of intensive development. Under this alternative, all on-site buildings would be demolished and removed. The layout for the land uses under this alternative would be the similar as under the proposed project, and would result in the development of 248 residential units and no restaurant or entertainment commercial uses.

Aesthetics

The height of the structures would remain the same under Alternative 5. Similarly, all visual impacts under this alternative would be comparable to the proposed project. Since impacts to visual resources

associated with the proposed project would be less than significant, the impact associated with Alternative 5 would not be substantially less than the proposed project.

As with the proposed project, Alternative 5 would result in significant and unavoidable shade and shadow impacts since it would shade the adjacent residential uses to the east for more than 2 hours.

Air Quality

On a daily basis, construction activities (e.g., equipment use assumptions) under Alternative 5 would be similar to those of the proposed project. As with the proposed project, the increase in emissions resulting from Alternative 5 would exceed daily thresholds recommended by the South Coast Air Quality Management District (SCAQMD). However, emissions resulting from both the proposed project and Alternative 5 would not exceed localized significance criteria recommend by the SCAQMD. As construction emissions would exceed daily thresholds recommended by SCAQMD, construction emissions generated by Alternative 5 would be significant. The difference between emissions between the proposed project and Alternative 5 would not be substantial.

Like the proposed project, Alternative 5 would not generate daily operational emissions of volatile organic compounds (VOC), oxides of nitrogen (NO_x), carbon monoxide (CO), sulfur oxides (SO_x), and particulate matter less than 10 microns in diameter (PM₁₀) and 2.5 microns in diameter (PM_{2.5}) that would exceed the thresholds of significance recommended by the SCAQMD. Given that neither the proposed project nor Alternative 5 would result in a significant impact with regard to operational air quality, impacts associated with Alternative 5 would not be substantially less than the proposed project.

Implementation of the proposed project would not expose sensitive receptors near roadway intersections to substantial pollutant concentrations. Alternative 5 would generate less vehicular traffic to and from the project site during the AM and PM peak-hour periods than the proposed project when localized concentrations of CO are the highest. Neither the proposed project nor Alternative 5 would result in a significant impact with regard to exposure to sensitive receptors. Therefore, impacts associated with Alternative 5 would not be substantially less than the proposed project.

Individual projects that exceed the SCAQMD-recommended daily thresholds for project-specific impacts are considered to cause a cumulatively considerable increase in emissions for those pollutants for which the basin is in nonattainment. As Alternative 5, like the proposed project, would exceed daily thresholds recommended by the SCAQMD during construction, Alternative 5 would generate a cumulatively considerable contribution to air pollutant emissions during construction. Therefore, like the proposed project, Alternative 5 would have a significant cumulative impact with respect to this criterion, and impacts associated with Alternative 5 would not be substantially less than the proposed project.

Population and Housing

The proposed project is not anticipated to induce substantial population growth in an area directly or indirectly. Alternative 5 would be a comparable project in terms of density and residents compared to the proposed project, and would therefore also result in less than significant impacts with respect to inducing substantial population growth in an area.

The project site currently contains a vacant commercial retail store that was formerly occupied by electronics retailer Circuit City. Therefore the proposed project and Alternative 5 would not displace any existing housing or require replacement housing to be built elsewhere.

All of the residents anticipated to occupy the project site after development of the proposed project are within the population and household projects for the City of Glendale. Therefore, under Alternative 5 and the proposed project, residents occupying the project site would be within the projected population and household growth projection for the City of Glendale.

Land Use and Planning

Alternative 5 would only include the proposed residential uses included in the proposed project and would not include commercial, entertainment or restaurant uses. The intensity of and number of residential uses in Alternative 5 would be comparable to the proposed project and would not conflict with the use or density standards in the General Plan or Zoning Code.

Like the proposed project, this alternative would not conflict with any of the goals, objectives, or policies of the Glendale General Plan. This alternative would redevelop the project site with new residential uses in downtown Glendale. The development would be, which served by existing utilities and public services. As a result, neither this alternative nor the proposed project would conflict with the goals of the Redevelopment Plan. Neither the proposed project nor Alternative 5 would result in a significant impact to land use. Given that neither the proposed project nor Alternative 5 would result in a significant impact, impacts associated with Alternative 5 would not be substantially less than the proposed project.

Noise

Construction activities associated with the proposed project and Alternative 5 such as demolition, earthmoving, and construction of on-site infrastructure would involve the use of heavy equipment, such as backhoes, dozers, loaders, concrete mixers, forklifts, and cranes. Under either the proposed project or Alternative 5, these noise sources would cause significant noise and groundborne vibration impacts. These impacts could be reduced but not eliminated through the implementation of mitigation measures

recommended for the proposed project. In addition, the construction duration associated with Alternative 5 would be comparable to the proposed project. Therefore, noise and groundborne vibration impacts would be about the same and would not be substantially reduced. As a result, construction of the proposed project or this alternative would both result in short-term significant and unavoidable impacts. Therefore, Alternative 5 would not avoid or substantially lessen a significant noise impact.

In addition, noise generated by construction of the proposed project or Alternative 5 could combine with construction activities associated with related projects in the area, thus resulting in a significant cumulative noise impact. As with the proposed project alone, these impacts could be reduced but not eliminated through the implementation of mitigation measures recommended for each project. As a result, construction of either the proposed project or Alternative 4 and related projects would result in short-term significant and unavoidable cumulative impacts. As a result, Alternative 4 would not avoid or substantially lessen a significant impact.

Long-term operational noise generated by traffic under this alternative would most likely be lower when compared to the proposed project because no commercial entertainment and restaurant uses are proposed in this alternative. Alternative 5 would result in comparable significant impacts with respect to noise as assessed to occur with the proposed project, and may result in more severe impacts.

Public Services

Fire Protection

Alternative 5, like the proposed project, would increase demand on the City of Glendale Fire Department for fire protection services and emergency medical services. Alternative 5 would result in a comparable number of calls for service due to residents, but no calls for the entertainment and commercial uses not included in this alternative, as compared to the proposed project. Alternative 5 would result in impacts to the City of Glendale Fire Department, as an increase in staff would be required to adequately serve the project site. Alternative 5, like the proposed project, would contribute tax revenue, which would help fund the Fire Department, and would also be required to incorporate mitigation measures, both of which would reduce impacts to a less than significant level. Based on the foregoing, neither the proposed project nor Alternative 5 would result in a significant impact to fire protection.

Police Protection

Alternative 5, like the proposed project, would increase demand on the City of Glendale Police Department for calls for service. Alternative 5 would result in impacts to the City of Glendale Police Department, as an increase in staff would be required to adequately serve the project site. Alternative 5,

like the proposed project, would contribute tax revenue, which would help fund the Police Department, and would also be required to incorporate mitigation measures, both of which would reduce impacts to a less than significant level. Given that neither the proposed project nor Alternative 5 would result in a significant impact, impacts to police associated with Alternative 5 would not be substantially less than the proposed project.

Recreation

Alternative 5, like the proposed project, would result in an increase in use of existing neighborhood and community parks. The City currently has a parkland-to-resident ratio of approximately 1.12 acres of parkland for every 1,000 residents while the City's park planning standard is 6 acres of neighborhood and community parkland per 1,000 residents. Existing park facilities are currently heavily used due to the deficiency in parkland in the City. Both the proposed project and the alternative would be required to pay the development impact fee and the tax increment set-aside over time, which is considered a reasonable means to partially mitigate impacts on park and recreation land and facilities. However, based on a conservative analysis, which takes into account both the prospect that the City/Agency could elect to reduce or suspend the tax increment set-aside in order to focus on other redevelopment priorities, and timing issues, this funding may not be fully provided, and the proposed project or this alternative would have a significant and unavoidable impact on park and recreation land and facilities.

Traffic, Circulation and Parking

Construction activities under Alternative 5 would be similar to those of the proposed project on a daily and peak-hour basis, but may occur over a shorter period, as Alternative 5 includes less development. Construction worker and truck trips would occur along major roadways with some of the trips generated during peak hours; however, construction impacts from either the proposed project or Alternative 5 would be less than significant. As a result, the construction-related traffic impact associated with Alternative 5 would not be substantially less than the proposed project.

Because of the elimination of commercial, restaurant, and entertainment uses, Alternative 5 would generate fewer vehicle trips during both AM and PM peak hours as compared to the proposed project. Because there would be fewer daily and peak-hour trips, traffic generated with this alternative, impacts would be incrementally less at the study area intersections. Traffic impacts would be incrementally less severe under this alternative compared to the proposed project.

A parking exception would be required with implementation of Alternative 5, and if the shared parking analysis prepared for the proposed project is used; this alternative would be sufficiently parked. Neither the proposed project nor Alternative 5 would result in a significant impact with regard to parking,

therefore, the impact associated with Alternative 4 would not be substantially less than the proposed project.

In addition, trips generated by the proposed project or this alternative could combine with trips generated by related projects in the area thus resulting in a significant cumulative impact at study area intersections and roadways. As with the proposed project, mitigation measures are available to reduce the severity of the impacts generated by related projects; however, many of these measures are infeasible due to the loss of sidewalks, trees, and parking, which would result in street widening and conflicts with bus stops, storm drains, or fire hydrants. Therefore, both the proposed project and Alternative 5 would result in significant and unavoidable cumulative traffic impacts, and therefore, like the proposed project, Alternative 5 would not avoid or substantially lessen a cumulatively significant impact.

Utilities and Services

Water

As with the proposed project, Alternative 5 would result in an increase in water demand. Water demand for the proposed project would be within the Glendale Water and Power (GWP) projections. Alternative 5, which would demand more water than the proposed project, would also be within the established GWP projections. Water demand impacts under both Alternative 5 and the proposed project would be less than significant. Given that neither the proposed project nor Alternative 5 would result in a significant impact, impacts associated with Alternative 5 would not be substantially less than the proposed project.

Sewer

Alternative 5, like the proposed project, would result in an increase in sewage generation. There is adequate treatment capacity at the Hyperion Treatment Plant to accommodate either Alternative 5 or the proposed project. In addition, sewer lines in the vicinity of the proposed project would be upgraded as part of the City's Tyburn Wastewater Capacity Improvement Project. The City imposes a sewer capacity increase fee on new developments that lead to an increase in the volume of wastewater discharged to the collection system. The alternative's sewage increase to the lines in the Tyburn Flume would be mitigated through payment of the sewer capacity increase fee, as required by the proposed project, and Alternative 5 impacts would be reduced to a less than significant level. Given that neither the proposed project nor Alternative 5 would result in a significant impact, impacts associated with Alternative 5 would not be substantially less than the proposed project.

Solid Waste

Alternative 5, like the proposed project, would result in an increase in the demand for solid waste services. There is adequate landfill capacity at the Scholl Canyon Landfill to accommodate either Alternative 5 or the proposed project. Therefore, impacts under both Alternative 5 and the proposed project would be less than significant and impacts associated with Alternative 5 would not be substantially less than the proposed project.

Solid waste generated by the proposed project or Alternative 5 would combine with solid waste generated by related projects in Glendale and would be deposited in area landfills. The current capacity of the Scholl Canyon and Puente Hills Landfills, which receive over 90 percent of the City's waste, is adequate to accommodate solid waste disposal needs of either the proposed project or Alternative 3, plus development of all related projects, for at least 10 years, if not longer. The City also utilizes four additional landfills, all of which are currently still accepting materials. These landfills are a part of the County Sanitation Districts of Los Angeles County (CSDLAC), which provides solid waste management for over half the population in Los Angeles County. The CSDLAC is currently in the process of increasing capacity to accommodate future increases in solid waste through the expansion of local landfills and the use of a regional waste-by-rail system and remote landfills. However, these improvements are not yet in place. For, example, waste-by-rail to the Mesquite Landfill in Imperial County will not be completed until 2011/12. Further, there is presently insufficient permitted disposal capacity within the existing system serving Los Angeles County. As a result, either the proposed project or Alternative 5, in combination with other development, could contribute to insufficient permitted disposal capacity by contributing additional solid waste to regional landfills. Therefore, the contribution of the proposed project and Alternative 5 to the cumulative impact would be considered cumulatively considerable, and would be a significant and unavoidable cumulative impact. The impact associated with Alternative 5 would not be substantially less than the proposed project.

Relationship of Alternative to Project Objectives

This alternative would not meet the following objectives for the proposed project:

- Provide a high-quality and functionally integrated housing and retail-commercial development that is distinctive and contributes to the creation of a downtown Glendale residential base;
- Focus development of high-density residential and retail-commercial uses on a site adjacent to compatible land uses;
- Provide new and expanded entertainment uses in Downtown Glendale; and
- Provide new and expanded restaurant uses in Downtown Glendale.

Environmentally Superior Alternative

State CEQA Guidelines Section 15126.6(e)(2) requires an EIR to identify an environmentally superior alternative among those evaluated in an EIR. Of the alternatives considered in this section, the No Project/No Development Alternative is environmentally superior to the other alternatives, because this alternative would avoid the significant and unavoidable air quality, noise, groundborne vibration, traffic, and recreation impacts identified for the Project. According to *State CEQA Guidelines* if the No Project/No Development Alternative is identified as the environmentally superior alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives. Of the other alternatives considered, the Reduced Density Alternative is considered environmentally superior, as it would result in the greatest incremental reduction of the overall level of impact when compared to the Project due to the reduction in intensity on the project site. In addition, Alternative 3 would meet all the objectives of the proposed project. While the overall impacts of the proposed project could be incrementally reduced by the selection of Alternative 3, the significant and unavoidable short-term air quality, noise, and groundborne vibration impacts during construction would not be eliminated by this alternative. Similarly, the long-term noise, traffic, and recreational impacts during operation would also not be eliminated by this alternative. Additionally, the development density and resulting revenue may not be sufficient to offset the cost of the land and may not be economically feasible for the applicant for this reason. Also, this alternative would only partially meet the project objectives due to this reduction in economical feasibility.