

## 7.0 ALTERNATIVES

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### INTRODUCTION

*This section of the EIR provides a comparative analysis of the merits of alternatives to the 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 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 Project to determine if these alternatives could avoid or substantially lessen these significant impacts. These alternatives included the no-project alternative, development of the Project at reduced density on the Project site, and development of the Project site with only office uses.

## 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 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 ability of the applicant to find and purchase an alternative site to develop the Project on is considered speculative. In addition, the development of an alternative site may not be able to meet the 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 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 Project and meet the basic project objectives. The following objectives for the Project are listed in **Section 3.0, Project Description**. The objectives of the Project are to:

- support the objectives of the Redevelopment Plan to eliminate blight and revitalize the San Fernando Road Corridor Redevelopment Area;
- redevelop an underutilized property with restaurant, retail services and office space for the community of Glendale;

- create a retail commercial plaza to activate and strengthen the vitality of southern Glendale;
- utilize architectural design, lighting, and landscape design to enhance the architectural character of the building and create a gateway building to the City of Glendale ;
- provide employment opportunities for City residents;
- increase local tax revenue in the City of Glendale; and
- promote the use of public transportation and the Glendale Transportation Center.

**Section 4.0, Environmental Impact Analysis**, of this EIR concludes that 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. The Project as would not result in any other significant impacts. 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 Project. A list of the alternatives selected for evaluation in this analysis is provided below.

- Alternative 1 – No Project/No Development
- Alternative 2 – Reduced Density (50 Percent Reduction)
- Alternative 3 – Office

### **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 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 four vacant buildings and associated surface parking would remain. None of the impacts associated with construction and operational activities would occur if the No Project/No Development Alternative were selected. No short-term air quality, noise, or groundborne vibration impacts would occur during construction and no long-term noise, traffic, or recreation impacts would occur during operation as a result of this alternative. This alternative is environmentally superior to the Project for these reasons.

### ***Relationship of Alternative to Project Objectives***

This alternative would directly result in the following objectives for the Project not being attained.

- Support the objectives of the Redevelopment Plan to eliminate blight and revitalize the San Fernando Road Corridor Redevelopment Area.
- Redevelop an underutilized property with restaurant, retail services and office space for the community of Glendale.
- Create a retail commercial plaza to activate and strengthen the vitality of southern Glendale.
- Utilize architectural design, lighting, and landscape design to enhance the architectural character of the building and create a gateway building to the City of Glendale.
- Provide employment opportunities for City residents.
- Increase local tax revenue in the City of Glendale.
- Promote the use of public transportation and the Glendale Transportation Center.

### **Alternative 2 – Reduced Density Alternative (50 Percent Reduction)**

The Reduced Density Alternative considers development of the entire 2.1-acre site with a reduced commercial 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 an 18,000 square-foot market; approximately 13,440 square feet of additional retail commercial space; approximately 5,605 square feet of restaurant and food court space; a 12,500-square-foot health spa facility; approximately 16,000 square feet of professional office space; and 16,000 square feet of medical office space. Under this alternative, all on-site buildings would be demolished and removed. The layout for the land uses under this alternative would change. None of the uses would be located below grade. The ground floor would consist of market, restaurant, and retail uses. The day spa and the remaining retail uses would be located on the second floor while medical and professional offices would be located on the third floor. The fourth story would be eliminated. Parking would be reduced from nine to five levels and include 299 spaces. By reducing the amount of development, the construction duration for this alternative would also be reduced. In addition, a reduction in the amount of commercial and office space would reduce the amount of indirect population generated under this alternative, which would reduce the demand for parks and recreational facilities.

### *Aesthetics*

The height of the structures would be reduced from four stories under the Project to three stories under Alternative 2. Similarly, all visual impacts under this alternative would be incrementally reduced compared to the Project. Since impacts to visual resources associated with the Project would be less than significant, the impact associated with Alternative 2 would not be substantially less than the Project.

### *Air Quality*

Construction activities (e.g., equipment use assumptions) under Alternative 2 would be similar to those of the Project on a daily basis but may occur over a shorter period, due to the reduced development associated with Alternative 2. As with the Project, the increase in emissions resulting from Alternative 2 would exceed daily thresholds recommended by the South Coast Air Quality Management District (SCAQMD). However, emissions resulting from both the Project and Alternative 2 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 2 would be significant. In terms of severity, Alternative 2 would be environmentally superior to the Project due to the length of construction. However, the difference between emissions between the Project and Alternative 2 would not be substantial.

Like the Project, Alternative 2 would not generate daily operational emissions of volatile organic compounds (VOC), oxides of nitrogen (NO<sub>x</sub>), carbon monoxide (CO), sulfur oxides (SO<sub>x</sub>), and particulate matter less than 10 microns in diameter (PM<sub>10</sub>) and 2.5 microns in diameter (PM<sub>2.5</sub>) that would exceed the thresholds of significance recommended by the SCAQMD. Given that neither the Project nor Alternative 2 would result in a significant impact with regard to operational air quality, impacts associated with Alternative 2 would not be substantially less than the Project.

Implementation of the Project would not expose sensitive receptors near roadway intersections to substantial pollutant concentrations. Alternative 2 would generate less vehicular traffic to and from the project site during the AM and PM peak-hour periods than the Project when localized concentrations of CO are the highest. Neither the Project nor Alternative 2 would result in a significant impact with regard to exposure to sensitive receptors. Therefore, impacts associated with Alternative 2 would not be substantially less than the 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 2, like the Project, would exceed daily thresholds recommended by the SCAQMD during construction, Alternative 2 would generate a cumulatively

considerable contribution to air pollutant emissions during construction. Therefore, like the Project, Alternative 2 would have a significant cumulative impact with respect to this criterion, and impacts associated with Alternative 2 would not be substantially less than the Project.

### ***Hazards***

The Phase I Environmental Site Assessment (ESA) prepared for the Project site indicated the presence of three anomalies under the southeast parking lot, indicating the presence of Underground Storage Tanks (USTs). Alternative 2 and the Project would implement **mitigation measure 4.3-6**, which would require an investigation of the anomalies and the removal of USTs if necessary. As such, Alternative 2 would be similar to the Project and impacts would be reduced to a less than significant level. The severity of impacts associated with Alternative 2 would remain the same.

Alternative 2 and the Project would require the demolition and removal of all the buildings on the site. The Phase I ESA prepared for the Project site indicated that the buildings have the potential to contain asbestos-containing building materials, lead-based paints, and polychlorinated biphenyls. If these materials are not removed prior to demolition of these buildings, the presence of these materials could create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. With the incorporation of mitigation measures recommended for the Project, Alternative 2 impacts would be similar to those of the Project and would be reduced to a less than significant level. The severity of impacts associated with Alternative 2 would remain the same.

Soils and groundwater beneath the site are contaminated with several pollutants associated with past uses on site and past and present uses off site. Alternative 2 and the Project would both require the disturbance of these soils and groundwater for the development of the Project. The construction and operation of this alternative could create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. With the incorporation of mitigation measures recommended for the Project, the impacts of Alternative 2 would be similar to the Project and would be reduced to a less than significant level. The severity of impacts associated with Alternative 2 would remain the same.

Two parcels within the site are listed on various government databases, as compiled pursuant to Government Code Section 65962.5. Glendale Rotary Offset Printing, located at 434 Fernando Court, and Chef's Select and Mountain Valley Water Company, located at 465 W. Los Feliz Road, were identified on the HAZNET and Well Investigation Program (WIP) regulatory database, respectively. Alternative 2, like the Project, would include the disturbance of soil on the Project site, which could contain contaminants

from these former uses. Development of Alternative 2, like the Project, would implement **mitigation measure 4.3-7**, which would require the preparation of a soil management plan to address the handling of soil that may contain low residual concentrations of petroleum hydrocarbons. As such, Alternative 2 would be similar to the Project and impacts would be reduced to a less than significant level. The severity of impacts associated with Alternative 2 would remain the same.

### *Land Use and Planning*

Alternative 2 would establish a mix of retail-commercial and office uses on the Project site that are allowed by the current General Plan and Zoning designations. The intensity of the retail-commercial and office uses would be within the maximum amounts allowed by these designations and this alternative would not conflict with the use or density standards in the General Plan or Zoning Code.

Like the 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 Project would conflict with the goals of the Redevelopment Plan. Neither the Project nor Alternative 2 would result in a significant impact with regard to land use. Given that neither the Project nor Alternative 2 would result in a significant impact, impacts associated with Alternative 2 would not be substantially less than the Project.

### *Noise*

Development activities associated with the Project and Alternative 2 during construction such as demolition, earthmoving, and construction of on-site infrastructure would involve the use of heavy equipment, such as backhoe, dozer, loaders, concrete mixers, forklifts, and cranes. Under either the Project or Alternative 2, 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 Project. In addition, the construction duration associated with Alternative 2 would be shorter when compared to the 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 Project under both scenarios would result in short-term significant and unavoidable impacts. Therefore, Alternative 2 would not avoid or substantially lessen a significant noise impact.

In addition, noise generated by construction of the Project or Alternative 2 could combine with construction activities associated with related projects in the area, thus resulting in a significant

cumulative noise impact. As with the 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 Project or Alternative 2 and related projects would result in short-term significant and unavoidable cumulative impacts. As a result, Alternative 2 would not avoid or substantially lessen a significant impact.

Long-term operational noise generated by traffic under this alternative would decrease compared to the Project. This is due to the decrease in the amount of traffic generated by this alternative. However, on average, like the Project, this alternative would result in an increase of 3 A-weighted decibels (dB(A)) 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 2 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 2, like the Project, would increase demand on the City of Glendale Fire Department for fire protection services and emergency medical services. Alternative 2, however, would result in fewer calls for service due to the smaller amount of commercial and office space. Alternative 2 would result in impacts to the City of Glendale Fire Department, as an increase in staff would be required to adequately serve the Project. Alternative 2, like the 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 Project nor Alternative 2 would result in a significant impact, impacts to fire associated with Alternative 2 would not be substantially less than the Project.

### **Police Protection**

Alternative 2, like the Project, would increase demand on the City of Glendale Police Department for calls for service. Alternative 2, however, would result in fewer calls for service due to the reduced amount of commercial and office space. Alternative 2 would result in impacts to the City of Glendale Police Department, as an increase in staff would be required to adequately serve the Project. Alternative 2, like the 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 Project nor Alternative 2 would result in a significant impact, impacts to police associated with Alternative 2 would not be substantially less than the Project.

## ***Recreation***

Alternative 2, like the 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. Alternative 2 would result in the direct generation of 105 employees, who would have 45 percent of the impact of a resident on City parks, and the indirect generation of approximately 76 persons, which would utilize City parks, while the Project would result in direct generation of 209 employees, who would have 45 percent of the impact of a resident on City parks, and the indirect generation of approximately 150 persons utilizing City parks. Both the 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 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 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 2 would be similar to those of the Project on a daily and peak-hour basis, but may occur over a shorter period, as Alternative 2 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 Project or Alternative 2 would be less than significant. As a result, the construction-related traffic impact associated with Alternative 2 would not be substantially less than the Project.

Because of the reduction in commercial-retail and office space, Alternative 2 would generate fewer vehicle trips during both AM and PM peak hours as compared to the Project. Because there would be fewer daily (3,933 fewer trips) and peak-hour (183 fewer peak-hour trips) traffic generated with this alternative, impacts would be lessened at the study area intersections. Although the reduced development of Alternative 2 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.

Under Alternative 2, Glendale Municipal Code would require a total 361 parking spaces. Alternative 2 would provide 299 spaces, which yields a deficiency of 62 parking spaces. A parking exception would be required with implementation of Alternative 2 and using the shared parking analysis prepared for the

Project, this alternative would be sufficiently parked. Neither the Project nor Alternative 2 would result in a significant impact with regard to parking. Therefore, the impact associated with Alternative 2 would not be substantially less than the Project.

In addition, trips generated by the 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 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 Project and Alternative 2 would result in significant and unavoidable cumulative traffic impacts. Therefore, like the Project, Alternative 2 would not avoid or substantially lessen a cumulatively significant impact.

### ***Utilities and Services***

#### **Water**

As with the Project, Alternative 2 would result in an increase in water demand. Alternative 2 would result in a demand for water of 32.7 acre-feet per year compared to the Project demand of 65.4 acre-feet per year. The provision of water as a result of the Project implementation would be within the projections of the Glendale Water and Power (GWP). Alternative 2, which would demand less water than the Project, would also be within the established GWP projections. Water demand impacts under both Alternative 2 and the Project would be less than significant. Neither the Project nor Alternative 2 would result in a significant impact. Given that neither the Project nor Alternative 2 would result in a significant impact, impacts associated with Alternative 2 would not be substantially less than the Project.

#### **Sewer**

Alternative 2, like the Project, would result in an increase in sewage generation. Alternative 2 would result in an increase of 23,350 gallons of sewage per day while the Project would result in an increase of 46,699 gallons of sewage per day. There is adequate treatment capacity at the Hyperion Treatment Plant to accommodate either Alternative 2 or the Project. In addition, sewer lines in the vicinity of the Project would be upgraded as part of the City's Tyburn Wastewater Capacity Improvement Project. However, 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 Project, and Alternative 2 impacts would be reduced to a less than significant level. Given that

neither the Project nor Alternative 2 would result in a significant impact, impacts associated with Alternative 2 would not be substantially less than the Project.

### **Solid Waste**

Alternative 2, like the Project, would result in an increase in the demand for solid waste services. Alternative 2 would generate an increase of 29.9 tons of solid waste per year compared to the Project increase of 59.7 tons of solid waste per year. There is adequate landfill capacity at the Scholl Canyon Landfill to accommodate either Alternative 2 or the Project. Therefore, impacts under both Alternative 2 and the Project would be less than significant and impacts associated with Alternative 2 would not be substantially less than the Project.

Solid waste generated by the Project or Alternative 2 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 Project or Alternative 2, 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 Project or Alternative 2, 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 Project and Alternative 2 to the cumulative impact would be considered cumulatively considerable, and would be a significant and unavoidable cumulative impact. The impact associated with Alternative 2 would not be substantially less than the Project.

### ***Relationship of Alternative to Project Objectives***

This alternative would not meet every aspect of the following objectives for the Project:

- Redevelop an underutilized property with restaurant, retail services and office space for the community of Glendale.
- Create a retail commercial plaza to activate and strengthen the vitality of southern Glendale.
- Utilize architectural design, lighting, and landscape design to enhance the architectural character of the building and create a gateway building to the City of Glendale.

- Provide employment opportunities for City residents.
- Increase local tax revenue in the City of Glendale.

### **Alternative 3 – Office Alternative**

The Office Alternative considers development of the entire 2.1-acre site with only office uses. 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 Project, and would result in the development of 66,000 square feet of medical office space and 66,000 square feet of professional office space for a total of 132,000 square feet. A subterranean level would include 12,000 square feet of storage. The height of the building would remain the same at four stories. Parking would be reduced from nine to eight levels (including two levels of subterranean parking) for a total of 585 spaces. By reducing the amount of development, the construction duration for this alternative would also be reduced.

#### ***Aesthetics***

The height of the structures would be four stories under the Project and Alternative 3. Similarly, all visual impact under this alternative would be less than significant, like the Project. The severity of impacts associated with Alternative 3 would remain the same.

#### ***Air Quality***

Construction activities (e.g., equipment use assumptions) under Alternative 3 would be similar to those of the Project on a daily basis but may occur over a shorter period, due to the reduced development associated with Alternative 3. As with the Project, the increase in emissions resulting from Alternative 3 would exceed daily thresholds recommended by SCAQMD. However, emissions resulting from both the Project and Alternative 3 would not exceed localized significance criteria recommend by 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 Project due to the length of construction. However, the difference between emissions between the Project and Alternative 3 would not be substantial.

Like the Project, Alternative 3 would not generate daily operational emissions of VOC, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> that would exceed the thresholds of significance recommended by the SCAQMD under both summer and winter conditions. Given that neither the Project nor Alternative 3 would result in a significant impact with regard to operational air quality, impacts associated with Alternative 3 would not

be similar. However, this Alternative would reduce vehicle trips by 4,000 trips, and as such the emissions associated with this alternative would be less.

Implementation of the Project would not expose sensitive receptors near roadway intersections to substantial pollutant concentrations. Alternative 3 would generate fewer vehicular trips to and from the Project site during the AM and PM peak-hour periods than the Project when localized concentrations of CO are the highest. Neither the 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 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 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 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 Project.

### ***Hazards***

The Phase I ESA prepared for the Project site indicated the presence of three anomalies under the southeast parking lot, indicating the presence of USTs. Alternative 3 and the Project would implement **mitigation measure 4.3-6**, which would require an investigation of the anomalies and the removal of USTs if necessary. As such, Alternative 3 would be similar to the Project and impacts would be reduced to a less than significant level. The severity of impacts associated with Alternative 3 would remain the same.

Alternative 3 and the Project would require the demolition and removal of all the buildings on the site. The Phase I ESA prepared for the Project site indicated that the buildings have the potential to contain asbestos-containing building materials, lead-based paints, and polychlorinated biphenyls. If these materials are not removed prior to demolition of these buildings, the presence of these materials could create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. With the incorporation of mitigation measures recommended for the Project, Alternative 3 impacts would be similar to those of the Project and would be reduced to a less than significant level. The severity of impacts associated with Alternative 3 would remain the same.

Soils and groundwater beneath the site are contaminated with several pollutants associated with past uses on site and past and present uses off site. Alternative 3 and the Project would both require the disturbance of these soils and groundwater for the development of the Project. The construction and

operation of this alternative could create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. With the incorporation of mitigation measures recommended for the Project, the impacts of Alternative 3 would be similar to the Project and would be reduced to a less than significant level. The severity of impacts associated with Alternative 3 would remain the same.

Two parcels within the site are listed on various government databases, as compiled pursuant to Government Code Section 65962.5. Glendale Rotary Offset Printing, located at 434 Fernando Court, and Chef's Select and Mountain Valley Water Company, located at 465 W. Los Feliz Road, were identified on the HAZNET and WIP regulatory database, respectively. Alternative 3, like the Project, would include the disturbance of soil on the Project site, which could contain contaminants from these former uses. Development of Alternative 3, like the Project, would implement **mitigation measure 4.3-7**, which would require the preparation of a soil management plan to address the handling of soil that may contain low residual concentrations of petroleum hydrocarbons. As such, Alternative 3 would be similar to the Project and impacts would be reduced to a less than significant level. The severity of impacts associated with Alternative 3 would remain the same.

### ***Land Use and Planning***

Alternative 3 would establish office uses on the Project site that are allowed by the current General Plan and Zoning designations. The intensity of the office uses would be within the maximum amounts allowed by these designations. This alternative would not conflict with the use or density standards in the General Plan or Zoning Code.

Like the 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 office uses in southern Glendale, which is presently served by existing utilities and public services. As a result, neither this alternative nor the Project would conflict with the goals of the Redevelopment Plan. Neither the Project nor Alternative 3 would result in a significant impact with regard to land use. Given that neither the Project nor Alternative 3 would result in a significant impact, impacts associated with Alternative 3 would not be substantially less than the Project.

### ***Noise***

Development activities associated with the 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 backhoe, dozer, loaders, concrete mixers, forklifts, and cranes. Under either the 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 Project. In addition, the construction duration associated with Alternative 3 would be shorter when compared to the Project due to the reduced density of the alternative. However, construction duration would not be shortened to the extent that noise and ground borne vibration impacts would be substantially reduced. As a result, construction of the Project under both scenarios would 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 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 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 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 Project. This is due to the decrease in the amount of traffic generated by this alternative. However, on average, like the Project, this alternative would result in an increase of 3 dB(A) in the noise levels on adjacent roadway segments 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 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 amount of commercial space. 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. Alternative 3, like the 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 Project nor Alternative 3 would result in a significant impact, impacts to fire associated with Alternative 3 would not be substantially less than the Project.

### **Police Protection**

Alternative 3, like the 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 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. Alternative 3, like the 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 Project nor Alternative 3 would result in a significant impact, impacts to police associated with Alternative 3 would not be substantially less than the Project.

### **Recreation**

Alternative 3, like the 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. Alternative 3 would result in the direct generation of approximately 581 employees,<sup>1</sup> who would have 45 percent of the impact of a resident on City parks, and the indirect generation of approximately 417 persons, which would utilize City parks, while the Project would result in direct generation of 209 employees, who would have 45 percent of the impact of a resident on City parks, and the indirect generation of approximately 150 persons utilizing City parks. Both the 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 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 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 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 Project or Alternative 3 would be less

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<sup>1</sup> Based on 4.4 employees per 1,000 square feet × 132,000 square feet of office and medical office space.

than significant. As a result, the construction-related traffic impact associated with Alternative 3 would not be substantially less than the Project.

The elimination of commercial space and the increase in office space associated with Alternative 3 would constitute a reduction in vehicle trips to 265 trips during the AM and PM peak hours as compared with the Project. In addition, 4,000 fewer trips daily trips would occur along area roadways. This decrease in trips would be lessened to the extent that significant impacts but would not eliminate the significant impact that is associated with the Project.

Under Alternative 3, Glendale Municipal Code would require a total 520 parking spaces. Alternative 3 would provide 585 spaces, which yields a surplus of 65 parking spaces. No parking exception would be required with implementation of Alternative 3. Neither the 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 Project.

In addition, trips generated by the Project 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 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 Project and Alternative 3 would result in significant and unavoidable cumulative impact. Therefore, like the Project, Alternative 3 would not avoid or substantially lessen a cumulatively significant impact.

### ***Utilities and Services***

#### **Water**

As with the Project, Alternative 3 would result in an increase in water demand. Alternative 3 would result in a demand for water of 37.0 acre-feet per year compared to the Project demand of 65.4 acre-feet per year. The provision of water as a result of the Project implementation would be within the projections of the GWP. Alternative 3, which would demand less water than the Project, would also be within the established GWP projections. Water demand impacts under both Alternative 3 and the Project would be less than significant. Neither the Project nor Alternative 3 would result in a significant impact. Given that neither the Project nor Alternative 3 would result in a significant impact, impacts associated with Alternative 3 would not be substantially less than the Project.

## Sewer

Alternative 3, like the Project, would result in an increase in sewage generation. Alternative 3 would result in an increase of 26,400 gallons of sewage per day while the Project would result in an increase of 46,699 gallons of sewage per day. There is adequate treatment capacity at the Hyperion Treatment Plant to accommodate either Alternative 3 or the Project. In addition, sewer lines in the vicinity of the Project would be upgraded as part of the City's Tyburn Wastewater Capacity Improvement Project. However, 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 Project, and Alternative 3 impacts would be reduced to a less than significant level. Given that neither the Project nor Alternative 3 would result in a significant impact, impacts associated with Alternative 3 would not be substantially less than the Project.

## Solid Waste

Alternative 3, like the Project, would result in an increase in the demand for solid waste services. Alternative 3 would result in the generation of 70.7 tons of solid waste per year compared to the Project increase of 59.7 tons of solid waste per year. While Alternative 3 would generate more solid waste than the Project, there is adequate landfill capacity at the Scholl Canyon Landfill to accommodate either Alternative 3 or the Project. Therefore, impacts under both Alternative 3 and the Project would be less than significant and impacts associated with Alternative 3 would not be substantially less than the Project.

Solid waste generated by the 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 enough to accommodate solid waste disposal needs of either the Project or Alternative 3, and 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 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 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 Project's contribution 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 Project.

### ***Relationship of Alternative to Project Objectives***

This alternative would not meet every aspect of the following objectives for the Project:

- Redevelop an underutilized property with restaurant, retail services and office space for the community of Glendale.
- Create a retail commercial plaza to activate and strengthen the vitality of southern Glendale.
- Increase local tax revenue in the City of 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 2 would meet all the objectives of the Project. While the overall impacts of the Project could be incrementally reduced by the selection of Alternative 2, 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.

With regards to the Office Alternative, none of the other identified significant impacts would be substantially reduced or avoided to the same degree as Alternative 2. In addition, Alternative 3 would fail to meet some of the objectives of the Project.