

7.0 ALTERNATIVES

INTRODUCTION

This section of the EIR provides a comparative analysis of the merits of alternatives to the proposed project pursuant to Section 15126.6 of the 2008 California Environmental Quality Act (CEQA) Statutes and 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 proposed 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 proposed 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, which 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 noise and groundborne vibration impacts during construction, and recreation impacts as a result of project implementation. 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 commercial/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 proposed 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 construction-related noise, groundborne vibration, and recreation impacts. 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**.

- Support the objectives of the Redevelopment Plan to eliminate blight and revitalize the San Fernando Road Corridor Redevelopment Area.

- Create a diversity of residential and urban uses to activate and strengthen the vitality of southern Glendale.
- Provide housing opportunities, pursuant to the Glendale Redevelopment Agency's policy, in an urban setting in close proximity to employment opportunities, public transportation, public facilities, and goods and services.
- Utilize architectural design, lighting, and landscape design within the residential component to compliment and enhance the architectural character of the proposed building while also fitting into the existing fabric of the area and give the project site a distinctive and pleasing appearance.
- Increase demand for local retail services.
- Provide employment opportunities for City residents.
- Develop a Transit Oriented Development, thereby reducing the number of vehicles, creating localized employment, revitalizing the local neighborhood and providing a dynamic living environment.

Section 4.0, Environmental Impact Analysis, of this EIR concludes that project implementation would result in some significant environmental impacts. These include short-term noise and groundborne vibration impacts during construction, and recreation impacts as a result of project implementation. No feasible measures are available that would mitigate these temporary construction impacts to a less than significant level. The project as proposed 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% Residential Reduction); and
- Alternative 3 – Commercial/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. Existing car wash facility, fast food and automobile

services uses, including 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 noise or groundborne vibration impacts would occur during construction, and no recreation impacts would occur 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 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.
- Create a diversity of residential and urban uses to activate and strengthen the vitality of southern Glendale.
- Provide housing opportunities, pursuant to the Glendale Redevelopment Agency's policy, in an urban setting in close proximity to employment opportunities, public transportation, public facilities, and goods and services.
- Utilize architectural design, lighting, and landscape design within the residential component to compliment and enhance the architectural character of the proposed building while also fitting into the existing fabric of the area and give the project site a distinctive and pleasing appearance.
- Increase demand for local retail services.
- Provide employment opportunities for City residents.
- Develop a Transit Oriented Development, thereby reducing the number of vehicles, creating localized employment, revitalizing the local neighborhood and providing a dynamic living environment.

Alternative 2 – Reduced Density Alternative (50% Residential Reduction)

The Reduced Density Alternative considers development of the entire 2.18-acre site with a reduced residential density. This alternative is considered to reduce the significant noise, groundborne vibration, and recreation impacts of the proposed project by reducing the amount of development. Under this alternative, all on-site buildings would be demolished and removed. The layout for the land uses proposed under this alternative would be the same as for the proposed project, and would result in the development of 109 apartments and 54,000 square feet of retail-commercial space. The height of the building would be reduced from five stories to three stories, minimizing the number of apartments by 109 dwelling units. Subterranean parking would be reduced from three and a half stories to three stories. Ground floor commercial space would remain at 54,000 square feet. By reducing the amount of development, the construction duration for this alternative would also be reduced. In addition, a

reduction in the number of dwelling units would reduce the population generated under this alternative, which would reduce the demand for parks and recreational facilities.

Land Use and Planning

Alternative 2 would establish a mix of retail-commercial and residential uses on the project site that are allowed by the current General Plan and the San Fernando Road Corridor Redevelopment Project Area. The intensity of the residential uses proposed would be within the maximum amounts allowed by these designations. This alternative would include 109 residential units and commercial uses fronting San Fernando Road as required under the Zoning Code. This alternative 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 residential and 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 or applicable policies contained in regional plans prepared by the Southern California Association of Governments (SCAG). However, neither the proposed project nor Alternative 2 would result in a significant impact with regard to land use.

Population and Housing

Alternative 2 would include 109 multi-family residential units consisting of one and two bedroom units. Based on an average household size of 3.0 persons per unit, the residential component of the project would most likely generate approximately 327 residents. Based on 3.0 employees per 1,000 square feet, the direct employment growth of the project would be 162 employees (54,000 square feet x 3.0 employees/1,000 square feet). Applying a 24 percent ratio (which is the percent of existing employees who work and reside in the City of Glendale), the employment positions would result in 39 of these new employees residing in the City of Glendale. If it is conservatively assumed that each new employee forms a single household in the City, 39 households could indirectly add approximately 117 additional residents to the City (39 households x 3 persons per household). Overall, the increase in population of 327 people that would be associated with Alternative 2 and the potential indirect increase of 117 people associated with project-related employment opportunities would result in a total population increase of 444 new residents to the City.

When the population increase from Alternative 2 is added to the 2008 Arroyo Verdugo Subregional population of 361,150, the resulting population is approximately 361,594 persons. In addition, when

housing and employment estimates associated with development of Alternative 2 are added to 2008 Arroyo Verdugo Subregional housing and employment figures, the resulting housing and employment figures are 131,295 housing units and 201,337 jobs. All of these demographic increases are well within 2010 Arroyo Verdugo Subregional projections.

The 2008 State Department of Finance population estimate for Glendale is 207,157. However, based on the City's projected annual growth rate between 2005 and 2010 as reported by SCAG, a more conservative estimate of the City's 2008 population is 208,989 persons. When the population increase from Alternative 2 is added to the 2008 City of Glendale population of 208,989, the resulting population is 209,433 residents. In addition, when the project's housing and employment increases are added to SCAG's 2008 housing and employment estimates for the City, the resulting housing and employment figures are 73,564 housing units and 93,795 jobs. All of these demographic increases are within SCAG's 2010 projections of 210,950 residents, 74,058 housing units and 94,591 jobs for the City of Glendale.

The population growth associated with either the proposed project or Alternative 2 would be within the amount of growth projected for the City. The impact associated with Alternative 2 would not be substantially less than the proposed project with regard to population and housing.

Aesthetics

The height of the structures would be reduced from five stories under the proposed project to three stories under Alternative 2. 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 2 would not be substantially less than the proposed project.

Traffic, Circulation and Parking

Construction activities under Alternative 2 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 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 proposed project.

Because of the reduction in residential units, Alternative 2 would generate fewer net vehicle trips during both AM and PM peak hours as compared to the project. Because there would be less daily and peak-hour traffic generated with this alternative, impacts would be lessened at the study intersections.

However, the reduction in residential units associated with Alternative 2 would not constitute a substantial reduction in net vehicle trips as compared with the proposed project. Because resulting impacts would be less than significant with the proposed project and Alternative 2, impacts associated with Alternative 2 would not be substantially less than the proposed project.

Under Alternative 2, the Glendale Municipal Code would require a total 543 parking spaces. Alternative 2 would provide 596 spaces, which yields a surplus of 53 parking spaces. No parking exception would be required with implementation of Alternative 2. However, neither the proposed project nor Alternative 2 would result in a significant impact with regard to parking. Therefore, impacts associated with Alternative 2 would not be substantially less than the proposed project.

Air Quality

Construction activities (e.g., equipment use assumptions) under Alternative 2 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 2. As with the proposed project, the net increase in emissions resulting from Alternative 2 would not exceed daily thresholds recommended by the South Coast Air Quality Management District (SCAQMD), and emissions resulting from Alternative 2 would not exceed localized significance criteria recommend by the SCAQMD. As a result, construction emissions generated by Alternative 2 would be less than significant. In terms of severity, Alternative 2 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 2 would not be substantial.

Like the proposed project, Alternative 2 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 under both summer and winter conditions. Given that neither the proposed 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 proposed 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 proposed project when localized concentrations of CO are the highest. Neither the proposed 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 proposed project.

Noise

Development activities associated with the proposed 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 proposed 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 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 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 proposed 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 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 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 proposed project. This is due to the decrease in the amount of traffic generated by this alternative. On average, like the proposed project, this alternative would result in a less than 3 A-weighted decibels (dB(A)) increase in the noise levels on affected roadway segments. This small reduction in roadway noise levels would not be noticeable. However, given that neither the proposed project nor Alternative 2 would result in a significant impact with regard to traffic generated noise impacts, impacts associated with Alternative 2 would not be substantially less than the proposed project.

Implementation of Alternative 2 would add new commercial and residential noise sources to the site, as with the proposed project. Noise generated from this alternative would include people talking, doors slamming, stereos, domestic animals, and music from dining uses. Overall, the noise generated by residential and commercial uses associated with Alternative 2 would not exceed the City's compatibility thresholds and is considered to be less than significant. Given that neither the proposed project nor

Alternative 2 would result in significant long-term operational noise impacts, Alternative 2 would not substantially lessen impacts.

Cultural Resources

Alternative 2 would be located on the same site as the proposed project. Consequently, cultural resource impacts to undocumented resources such as potential burial sites, archaeological sites or material, and paleontological sites and materials would be similar to those of the proposed project. Project mitigation measures would apply to Alternative 2 to reduce cultural resource impacts to less than significant. The resulting impact on cultural resources would be less than significant under either Alternative 2 or the proposed project.

Development of Alternative 2, like the proposed project, would include the demolition of all the buildings on the site. None of the buildings on site is considered a historic resource. As a result, demolition of the buildings on the site would not result in a significant impact to historic resources under either Alternative 2 or the proposed project. Therefore, impacts associated with Alternative 2 would not be substantially less than the proposed project.

Public Services

Fire Protection

Alternative 2, like the proposed 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 residential units. 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 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. Therefore, neither the proposed project nor Alternative 2 would result in a significant impact.

Police Protection

Alternative 2, like the proposed project, would increase demand on the City of Glendale Police Department calls for service. Alternative 2, however, would result in fewer calls for service due to the reduced number of residential units. 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 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 2 would result in a significant impact, impacts to police associated with Alternative 2 would not be substantially less than the proposed project.

Schools

Alternative 2 would generate new students in the Glendale Unified School District, as would the proposed project. Alternative 2, however, would generate fewer new students due to the reduced number of residential units. With the incorporation of the mitigation requiring the payment of school fees, as required with the proposed project, impacts associated with Alternative 2 would be reduced to a less than significant level. Neither the proposed project nor Alternative 2 would result in a significant impact. Therefore, impacts to schools associated with Alternative 2 would not be substantially less than the proposed project.

Utilities and Services

Water

As with the proposed project, Alternative 2 would result in a net increase in water demand. Alternative 2 would result in a net demand for water of 22.88 acre-feet per year compared to the proposed net project demand of 43.31 acre-feet per year. The provision of water as a result of the proposed project implementation would be within the projections of the Glendale Water and Power (GWP). Alternative 2, which would demand less water than the proposed project, would also be within the established GWP projections. Water demand impacts under both Alternative 2 and the proposed project would be less than significant. Neither the proposed project nor Alternative 2 would result in a significant impact.

Sewer

Alternative 2, like the proposed project, would result in a net increase in sewage generation. Alternative 2 would result in a net increase of 16,332 gallons of sewage per day while the proposed project would result in a net increase of 30,932 gallons of sewage per day. There is adequate treatment capacity at the Hyperion Treatment Plant to accommodate either Alternative 2 or the proposed 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 net 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 2

impacts would be reduced to a less than significant level. Given that neither the proposed project nor Alternative 2 would result in a significant impact, impacts associated with Alternative 2 would not be substantially less than the proposed project.

Solid Waste

Alternative 2, like the proposed project, would result in an increase in the net demand for solid waste services. Alternative 2 would generate a net increase of 75.74 tons of solid waste per year compared to the proposed project net increase of 113.13 tons of solid waste per year. There is adequate landfill capacity at the Scholl Canyon Landfill to accommodate either Alternative 2 or the proposed project. Therefore, impacts under both Alternative 2 and the proposed project would be less than significant and impacts associated with Alternative 2 would not be substantially less than the proposed project.

Solid waste generated by the proposed 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 enough to accommodate solid waste disposal needs of either the project or Alternative 2, and development of all related projects, for at least 10 years, if not longer. The City also utilizes five 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 and will not be completed until at least 2009. 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 2, 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 2 would not be substantially less than the proposed project.

As with the proposed project, Alternative 2 would implement a waste diversion program in an effort to help the City meet its waste diversion goal of 50 percent as mandated by Assembly Bill (AB) 939. In addition, Alternative 2, like the proposed project, would comply with the Municipal Code by enclosing trash collection areas. Impacts under both Alternative 2 and proposed project would be less than significant. Given that neither the proposed project nor Alternative 2 would result in a significant impact

in terms of regulation compliance, impacts associated with Alternative 2 would not be substantially less than the proposed project.

Recreation

Alternative 2, like the proposed project, would result in an increase in use of existing neighborhood and community parks. The City currently has a park land-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 and indirect generation of approximately 444 persons, which would utilize City parks, while the proposed project would result in direct and indirect generation of approximately 771 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, as 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 both the proposed project and Alternative 2 would have a significant and unavoidable impact on park and recreation land and facilities. Although the reduced development of Alternative 2 would create less demand on City parks and recreation facilities, the demand would not be lessened to the extent that significant impacts would be substantially reduced or avoided.

Relationship of Alternative to Project Objectives

This alternative would meet all project objectives.

Alternative 3 – Commercial/Office Alternative

The Commercial/Office Alternative considers development of the entire 2.18-acre site with only commercial and office uses. This alternative was formulated to reduce the significant noise, groundborne vibration, and recreation impacts of the proposed project by reducing the amount of development and population generated. Under this alternative, all on-site buildings would be demolished and removed. The layout for the land uses proposed under this alternative would be the similar as for the proposed project, and would result in the development of 108,000 square feet of office space atop 54,000 square feet of retail-commercial space. The height of the building would be reduced from five stories to three stories. Subterranean parking would be reduced from three and a half stories to three stories. Ground floor commercial space would remain at 54,000 square feet. By reducing the amount of development, the construction duration for this alternative would also be reduced. In addition, the absence of a residential component associated with this alternative would reduce the demand for parks and recreational facilities.

Land Use and Planning

Alternative 3 would establish a mix of commercial and office uses on the project site that are allowed by the current General Plan and DSP Zoning designations. The intensity of the commercial and office uses proposed would be within the maximum amounts allowed by these designations. This alternative would include 108,000 square feet of office space and 54,000 square feet of commercial space. This alternative 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 commercial uses in southern Glendale, which is presently served by existing utilities and public services. Alternative 3 would conflict with the Redevelopment Plan's objective of the expansion of the community's supply of housing. Neither this alternative nor the proposed project would conflict with the applicable policies contained in regional plans prepared by the SCAG.

Population and Housing

Alternative 3 would include a total of 162,000 square feet of commercial and office uses. Based on 3.0 employees per 1,000 square feet, the direct employment growth of Alternative 3 would be 486 employees (162,000 square feet x [3.0 employees/1,000 square feet]). Applying the 24 percent ratio of existing employees who work in the City of Glendale, the employment positions would result in 117 of these new employees residing in the City of Glendale under Alternative 3. Therefore, these 117 households could indirectly add approximately 328 additional residents to the City (117 household x 2.8 persons per household). Overall, Alternative 3 would result in a total population increase of 328 new residents to the City.

When the population increase from Alternative 3 is added to the 2008 Arroyo Verdugo Subregional population of 361,150, the resulting population is approximately 361,478 persons. Given that residential units are not proposed under this alternative, an increase in housing would not result. In addition, when employment estimates associated with development of Alternative 3 are added to 2008 Arroyo Verdugo Subregional employment figures, the resulting employment figures are 201,661 jobs. These demographic increases are well within 2015 Arroyo Verdugo Subregional projections.

The 2008 State Department of Finance population estimate for Glendale is 207,157. However, based on the City's projected annual growth rate between 2005 and 2010 as reported by SCAG, a more conservative estimate of the City's 2008 population is 208,989 persons. When the population increase from Alternative 3 is added to the 2008 City of Glendale population of 208,989, the resulting population is 209,317 residents. In addition, when the employment increase associated with Alternative 3 is added to

SCAG's 2008 employment estimate for the City, the resulting employment figures are 94,119 jobs. All of these demographic increases are within SCAG's 2015 projections of 210,950 residents and 94,591 jobs for the City of Glendale.

The population growth associated with either the proposed project or Alternative 3 would be within the amount of growth projected for the City. The impact associated with Alternative 3 would not be substantially less than the proposed project.

Aesthetics

The height of the structures would be reduced from five stories under the proposed project to three stories under the Alternative 3. Similarly, all visual impact 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.

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 project or Alternative 3 would be less than significant. Construction-related traffic impact associated with Alternative 3 would not be substantially less than the proposed project.

As indicated in **Table 7.0-1, Alternative 3 Trip Generation**, this alternative would generate 276 fewer new vehicle trips as compared to the project. Because there would be less daily and peak-hour traffic generated with this alternative, impacts would be lessened at the analyzed intersections. Because resulting impacts would be less than significant with the proposed project and Alternative 3, and the reduction in trips would not be substantial, the impact associated with Alternative 3 would not be substantially less than the proposed project.

Under Alternative 3, Glendale Municipal Code would require a total 590 parking spaces. Alternative 2 would provide 596 spaces, which yields a surplus of 6 parking spaces. No parking exception would be required with implementation of Alternative 3. 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.

**Table 7.0-1
Alternative 3 Trip Generation¹**

Land Use	Size	Daily Trip Ends ² Volumes
Proposed		
Apartments ³	218 DU	1,464
Shopping Center ⁴	54,000 SF	2,318
-Less Walk-In/Internal Capture (10%) ⁵		(232)
-Less Pass-By (20%) ⁶		(418)
Subtotal		3,132
Alternative 3		
General Office ⁸	108,000 SF	1,188
Shopping Center ⁷	54,000 SF	2,318
-Less Walk-In/Internal Capture (10%) ⁵		(232)
-Less Pass-By (20%) ⁶		(418)
Subtotal		2,856
Net New Trips Compared with Proposed Project		(276)

Source: Linscott, Law & Greenspan, Engineers, 2008.

¹ ITE "Trip Generation," 7th Edition, 2003.

² Trips are one-way traffic movements, entering or leaving.

³ ITE Land Use Code 220 trip generation average rates.

⁴ ITE Land Use Code 820 trip generation average rates.

⁵ A 10% walk-in capture trip adjustment factor has been applied.

⁶ Trip reduction for pass-by trips based on ITE "Trip Generation," 7th Edition, 2003.

⁷ ITE Land Use Code 948 trip generation average rates.

⁸ ITE Land Use Code 710 trip generation average rates.

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 net increase in emissions resulting from Alternative 3 would not exceed daily thresholds recommended by the SCAQMD, and emissions resulting from Alternative 3 would not exceed localized significance criteria recommended by the SCAQMD. As a result, construction emissions generated by Alternative 3 would be less than 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 VOC, NO_x, CO, SO_x, PM₁₀ and PM_{2.5} that would exceed the thresholds of significance recommended by the SCAQMD under both summer and winter conditions. 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 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.

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 backhoe, dozer, tractors, 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 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 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 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. On average, like the proposed project, this alternative would result in a less than 3 (dB(A)) increase in the noise levels on affected roadway segments. This small reduction in roadway noise levels would not be noticeable. However, given that neither the proposed project nor Alternative 3 would result in a significant impact with regard to traffic generated noise impacts, impacts associated with Alternative 3 would not be substantially less than the proposed project.

Implementation of Alternative 3 would add new commercial and office/professional service noise sources to the site, as with the proposed project. Noise generated from this alternative would include people talking, doors slamming, and music from dining uses. Overall, the noise generated by commercial and professional uses associated with Alternative 3 would not exceed the City's compatibility thresholds and is considered to be less than significant. Given that neither the proposed project nor Alternative 3 would result in significant long-term operational noise impacts, Alternative 3 would not substantially lessen impacts.

Cultural Resources

Alternative 3 would be located on the same site as the proposed project. Consequently, cultural resources impacts to undocumented resources such as potential burial sites, archaeological sites or material, and paleontological sites and materials would be similar to those of the proposed project. Project mitigation measures would apply to Alternative 3 to reduce cultural resources impacts to less than significant. The resulting impact on cultural resources would be less than significant under either Alternative 3 or the proposed project.

Development of Alternative 3, like the proposed project, would include the demolition of all the buildings on the site. None of the buildings on site is considered a historic resource. As a result, demolition of the buildings on the site would not result in a significant impact to historic resources under either Alternative 3 or the proposed project. Therefore, impacts associated with Alternative 3 would not be substantially less than the proposed project.

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 removal 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. 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. Therefore, neither the proposed project nor Alternative 3 would result in a significant impact.

Police Protection

Alternative 3, like the proposed project, would increase demand on the City of Glendale Police Department calls for service. Alternative 3, however, would result in fewer calls for service due to the removal of residential units. 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 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.

Schools

The introduction of jobs associated with Alternative 3 would indirectly generate new students in the Glendale Unified School District. With the incorporation of the mitigation requiring the payment of school fees, as required by the proposed project, impacts associated with Alternative 3 would be reduced to a less than significant level. Neither the proposed project nor Alternative 3 would result in a significant impact. Therefore, impacts to schools associated with Alternative 3 would not be substantially less than the proposed project.

Utilities and Services

Water

As with the proposed project, Alternative 3 would result in a net increase in water demand. Alternative 3 would result in a net demand for water of 25.1 acre-feet per year compared to the proposed net project demand of 43.31 acre-feet per year. The provision of water as a result of the proposed project implementation would be within the projections of the 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.

Sewer

Alternative 3, like the proposed project, would result in a net increase in sewage generation. Alternative 3 would result in a net increase of 17,932 gallons of sewage per day while the proposed project would result in a net increase of 30,932 gallons of sewage per day. 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 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 net 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 net demand for solid waste services. Alternative 3 would result in the net generation of 93.92 tons of solid waste per year compared to the proposed project net increase of 113.13 tons of solid waste per year. 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 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 five 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 and will not be completed until at least 2009. 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 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 proposed project.

As with the proposed project, Alternative 3 would implement a waste diversion program in an effort to help the City meet its waste diversion goal of 50 percent as mandated by AB 939. In addition, Alternative 3, like the proposed project, would comply with the Municipal Code by enclosing trash collection areas. Impacts under both Alternative 3 and proposed project would be less than significant. Given that neither the proposed project nor Alternative 3 would result in a significant impact in terms of regulation compliance, impacts 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 park land-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 indirect generation of approximately 328 persons, which would utilize City parks, while the proposed project would result in direct and indirect generation of approximately 771 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, as 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 both the proposed project and Alternative 2 would have a significant and unavoidable impact on park and

recreation land and facilities. Although the reduced development of Alternative 2 would create less demand on City parks and recreation facilities, the demand would not be lessened to the extent that significant impacts would be substantially reduced or avoided.

Relationship of Alternative to Project Objectives

This alternative would not meet the following objectives of the project.

- Create a diversity of residential and urban uses to activate and strengthen the vitality of southern Glendale;
- Provide housing opportunities, pursuant to the Glendale Redevelopment Agency's policy, in an urban setting in close proximity to employment opportunities, public transportation, public facilities, and goods and services;
- Develop a Transit Oriented Development, thereby reducing the number of vehicles, creating localized employment, gentrifying the local neighborhood and providing a dynamic living environment.

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 noise, groundborne vibration, and recreation impacts identified for the proposed 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 Commercial/Office Alternative is considered environmentally superior, as it would result in an incremental reduction of the overall level of impact when compared to the proposed project due to the elimination of the residential units. While the overall impacts of the proposed project could be incrementally reduced by the selection of Alternative 3, the significant and unavoidable noise and groundborne vibration impacts during construction, and recreation impact would not be eliminated by this alternative. Additionally, the Commercial/Office Alternative would not meet three key project objectives relating to strengthening the vitality of the surrounding area through transit oriented housing opportunities. Additionally, the development density and resulting revenue would not be sufficient to offset the cost of the land and would not be economically feasible for the applicant for this reason.