5.0 ALTERNATIVES

This section of the environmental impact report (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 substantially lessen significant effects of the Project. According to the 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 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 *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 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 substantially lessen the significant impacts associated with the project, (3) the ability of the alternatives to feasibly attain most of the objectives of the project, and (4) the feasibility and comparative merit of the alternatives. These factors would be unique for each project.

SELECTION OF ALTERNATIVES FOR ANALYSIS

According to the 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 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 include Project-specific impacts: (1) short-term noise and vibration impacts during construction; (2) on-site noise and vibration impact due to vehicle operations; (3) Project shade impacts on adjacent land uses; (4) Project and cumulative impacts to recreation facilities; (5) long-term shade impacts on adjacent land uses; (6) cumulative impacts to fire; (7) cumulative impacts to police; and (8) cumulative impacts to solid waste disposal. In

response to these impacts, the City of Glendale 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, the all-commercial alternative, and a height and density reduction alternative.

ALTERNATIVES CONSIDERED BUT NOT EVALUATED IN DETAIL

Section 15126.6(c) of the 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 in the following paragraphs are the reasons for not providing a detailed evaluation of an off-site alternative.

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 City of Glendale 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 on which to develop the Project 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 could result in similar project-specific short-term noise and vibration impacts during construction, the same long-term on-site noise impacts due to vehicle operations, the same long-term and cumulative impacts to recreation facilities, and the same cumulative impacts to fire, police, and solid waste. Thus, the selection of an alternative site would not avoid many of the significant impacts. As indicated in CEQA Guidelines, Section 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 previously, the relocation of the Project to an alternative site would not be feasible because (1) obtaining an alternative site is considered speculative, and (2) 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 previously, the City of Glendale 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:

- Provide a well-designed mixed-use project that is compatible and complementary with surrounding land uses.
- Provide housing opportunities in an urban setting in close proximity to employment opportunities, public facilities, goods, and services.
- Provide affordable housing within the City of Glendale.
- Design a project with architectural features and materials appropriate for the location of the site, the size of the building, and surrounding uses.
- Implement the Redevelopment Plan objectives, but without redevelopment agency assistance.
- Increase property tax revenues to the City of Glendale.
- Generate construction employment opportunities in the City and in the region.

Based on the environmental analysis, alternatives were developed that 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.

- Alternative 1—No Project/No Development
- Alternative 2—All Commercial Alternative
- Alternative 3—Height and Density Reduction Alternative

Alternative —No Project/No Development Alternative

The No Project/No Development Alternative is required to be evaluated by Section 15126(2)(4) of the CEQA Guidelines. As required by the CEQA Guidelines, the analysis must examine the impacts that 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 remain in its current and existing condition. The single-story retail store (Office Depot) and accompanying surface parking lot, a 2-story apartment building containing 10 residential units, and a two-car garage would remain. These existing uses would continue, and the existing environmental conditions would be maintained. None of the impacts associated with construction and operational activities would occur if the No Project/No Development Alternative were selected. No short-term equipment noise and groundborne vibration impacts during construction, long-term exterior noise due to vehicle operations, cumulative construction noise impacts, long-term shade impacts on adjacent land uses, long-term and cumulative recreation impacts, cumulative impacts to fire, cumulative impacts to police, and cumulative impacts to

solid waste disposal would occur as a result of this alternative. This alternative is environmentally superior to the Project for these reasons.

Alternative 2—All-Commercial Alternative

The All-Commercial Alternative includes 80,000 square feet of commercial retail space. Each of the four floors would average approximately 16,000 square feet of commercial retail space.

The subterranean parking structure would accommodate 320 parking spaces on at-grade and one level of subterranean parking structure and would include 31 secured bicycle spaces.[1] Of the total amount of parking provided, 11 spaces would be designated as handicap-accessible spaces. Vehicle access to the parking structure would be from W. Broadway. As with the Project, this driveway would be controlled by a stop sign.

Similar to the Project, the Alternative 2 building would be 60 feet above ground in height and would be designed as a contemporary structure utilizing various building materials to conform to the design guidelines for the SFMU zone. The size and massing of the All-Commercial Alternative building would be similar to the design of the Project building.

By eliminating the residential component from the Project, the commercial uses would not directly result in the generation of new residents within the City of Glendale. However, the All-Commercial Alternative would generate 77 AM peak-hour trips, 213 PM peak-hour trips, and a total of 3,416 daily trips. When compared to the Project, Alternative 2 would result in an increase of 22 AM peak-hour trips, 36 PM peak-hour trips, and 1,180 daily trips. The increase in traffic generated by the All-Commercial Alternative would be greater than the traffic generated by the Project.

Aesthetics

Similar to the Project, the maximum height of the structure under Alternative 2 would be approximately 65 feet above adjacent grade and 5 stories. Therefore, the height of the proposed structures would not significantly obstruct views across the Project site as existing views of the Verdugo Mountains and San Rafael Hills are already obstructed. Due to the same height and building mass of the structure, this Alternative would result in similar shade/shadow impacts as the Project which would be significant and unavoidable.

Similar to the Project, this Alternative incorporates design features to provide privacy for adjacent neighbors, attract the passerby along W. Broadway, and increase open spaces on the ground floor near

1 320 spaces (4 spaces per 1,000 square feet) would be required for commercial retail use.

the southern portion of the site and along the frontage of N. Pacific and N. Kenilworth Avenues. In addition, these elevations incorporate the primary building materials proposed for the exterior of the building, including stucco, concrete, and metal. The Alternative would improve the aesthetic character of the site, given the architectural design of the Alternative and the use of design elements, such as the comprehensive landscape plan to be implemented along the view corridors and in the northwest portion of the site, and the structural setback from neighboring properties. Alternative 2 would be subject to the same design review process and the same regulations concerning light and glare as the proposed Project. Similarly, all other visual impacts under this alternative would be similar when compared to the Project. Impacts to visual resources associated with this alternative would be significant and unavoidable.

Air Quality

Both Alternative 2 and the Project would involve the construction of a 5-story commercial building with one level of subterranean parking. Since the size and massing of this alterative would be similar to that of the Project, construction activities for Alternative 2 would be similar to those of the Project on a daily basis. Construction activities would occur on a similar scale and over a similar period of time in comparison with construction phase for the Project. Construction assumptions similar to the project would apply, including SCAQMD Rule 403 compliance for watering to minimize dust and requirements that construction equipment be equipped with Tier 3 off-road engines.

Similar to the Project, short-term emissions of criteria air pollutants (e.g., CO, SOx, PM10, and PM2.5) generated by project construction and ozone precursors (e.g., ROG and NOx) were assessed in accordance with SCAQMD-recommended methods. Where quantification was required, these emissions were modeled using the CARB-approved California Emissions Estimator Model 2013.2.2 (CalEEMod) computer program as recommended by the SCAQMD. Based on the modeling which includes the 80,000 square feet of commercial retail space, construction of Alternative 2 would result in maximum daily emissions of 71.29 pounds/day of volatile organic compounds (VOC), 13.79 pounds/day of nitrogen oxides (NOx), 28.32 pounds/day of carbon monoxide (CO), 0.10 pounds/day of sulfur oxides (Sox), 5.13 pounds/day of suspended particulate matter (PM10), and 3.76 pounds/day of fine particulate matter (PM2.5), none of which exceeds SCAQMD thresholds for criteria pollutants. As discussed, emissions would be similar under this Alternative when compared to the Project. As with the Project, the increase in emissions resulting from Alternative 2 would not exceed daily thresholds recommended by the SCAQMD.

The estimated emissions are based on development of all the proposed land uses of Alternative 2 and the total number of daily trips, and are presented in **Table 5.0-1, Alternative 2 Estimated Operational**

Emissions. Emissions are subsequently compared to the SCAQMD established operational significance thresholds.

As shown in **Table 5.0-1**, the emissions associated with Alternative 2 would not exceed the SCAQMD's recommended operational emission thresholds. However, the Alternative would increase all emissions during operation of the Alternative as a result of the increased number of vehicle trips per day. The Alternative would result in incremental increases of VOC emissions by 5.42 pounds/day, NOx emissions by 3.31 pounds/day, CO emissions by 11.06 pounds/day, SOx emissions by 0.03 pounds/day, PM10 emissions by 1.33 pounds/day, and PM2.5 emissions by 0.34 pounds/day when compared to the Project. The operational impacts associated with Alternative 2 would remain under the SCAQMD significance thresholds and would be less than significant. The operational impacts associated with Alternative 2 would remain under the SCAQMD significance thresholds and, like the Project, would be less than significant. However, impacts to air quality for Alternative 2 would be greater than those for the Project.

Table 5.0-1
Alternative 2 Estimated Operational Emissions (pounds/day)

Source	VOC	NOx	CO	SOx	PM10	PM2.5
Alternative 2 operational emissions	16.61	27.69	118.31	0.22	15.41	4.36
Existing operational emissions	6.44	10.33	43.55	0.07	4.94	1.43
Net total emissions	**10.17**	**17.36**	**74.76**	**0.15**	**10.47**	**2.93**
SCAQMD threshold	55	55	550	150	150	55
Threshold exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

*Note: Refer to Air Quality Modeling in **Appendix 5.0.***

The Alternative 2–specific localized significance thresholds for SRA 7 (East San Fernando Valley) are shown in **Table 5.0-2, Alternative 2 LST Worst-Case Emissions,** and are compared with the maximum daily on-site construction and operational emissions during Alternative 2.

Table 5.0-2
Alternative 2 LST Worst-Case Emissions (pounds/day)

Source	NOx	CO	PM10	PM2.5
Construction				
Total mitigated maximum emissions	23.93	23.35	2.70	1.67
LST threshold	106.5	722.6	6.1	3.7
Threshold exceeded?	**No**	**No**	**No**	**No**
Operational				
Area/energy emissions*	0.00	(0.79)	0.003	0.003
LST threshold	106.5	722.6	1.7	1.0
Threshold exceeded?	**No**	**No**	**No**	**No**

*Source: Refer to Air Quality Modeling in **Appendix 5.0, Air Emissions Modeling.***
** Net total, taking existing operational emissions into account.*

As previously mentioned, due to the similar scale and massing of the Alternative 2 building, construction activities would occur on a similar scale and over a similar period of time when compared to the Project. Construction equipment would be similar to that proposed to be utilized by the Project. When the Alternative operational emissions are compared to the Project, the Alternative would result in similar NOx emissions, reduced CO emissions (by 0.79 pounds/day), incrementally higher PM10 emissions (by 0.003 pounds/day), and incrementally higher PM2.5 emissions (by 0.003 pounds/day).[2] As shown in **Table 5.0-2,** neither this alternative nor the Project would result in significant localized air quality emission impacts. Therefore, impacts to air quality for Alternative 2 would be similar to those for the Project.

The annual net GHG emissions associated with the construction/operation of Alternative 2 are provided below in **Table 5.0-3, Alternative 2 Estimated Greenhouse Gas Emissions.** The sum of the direct and indirect emissions associated with Alternative 2 is compared with the SCAQMD's screening threshold of significance for all land use projects, which is 3,000 $MTCO_2E$ per year.

2 Estimated Project operational emissions are as follows: 0.72 pounds/day NOx, 14.59 pounds/day CO, 0.12 pounds/day PM10, and 0.12 pounds/day PM2.5.

Table 5.0-3
Alternative 2 Estimated Greenhouse Gas Emissions

GHG Emissions Source	Emissions (MT CO2E/year)
Construction (amortized)	23.75
Operational (mobile) sources*	3,285.70
Area sources	0.01
Energy	622.63
Waste	4.53
Water	0.33
Existing use	*-1,353.44*
Annual total	**2,583.46**

*Source: Emissions calculations are provided in **Appendix 5.0.***
** N2O emissions account for 0.06 MTCO2E per year.*

As shown in the **Table 5.0-3,** Alternative 2 would increase GHG emissions by 498.78 MTCO2E/year higher than the Project (2,084.99 MTCO2E/year). Although this Alternative would result in 498.78 MTCO2E/year higher GHG emissions when compared to the Project, neither Alternative 2 nor the Project would result in significant GHG emission impacts. Overall, impacts to GHG emissions for Alternative 2 would be greater than those for the Project.

Land Use and Planning

Pursuant to Section 30.14.010(B) Table 30.14-A of the City's Zoning Ordinance, commercial uses are permitted within the SFMU zone. Alternative 2 would establish commercial uses on the Project site that are allowed by the current General Plan and Zoning designations. The intensity of the commercial uses would be within the maximum amounts allowed to 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 the San Fernando Road Redevelopment Corridor area of Glendale, which are presently served by existing utilities and public services. The size of the commercial space provided by this Alternative would be substantially greater than that provided by the Project. As a result, neither this alternative would conflict with the goals of the Redevelopment Plan and would not result in a significant impact with regard to land use. Alternative 2 would not result in a significant impact, similar to the Project.

Noise

Development activities associated with the Project and Alternative 2 during construction, such as earthmoving and construction of on-site infrastructure, would involve the use of heavy equipment, such as a backhoe, dozer, loaders, concrete mixers, forklifts, and cranes. Under both the Project and Alternative 2, these construction equipment sources would cause significant noise impacts. For both development scenarios, these impacts could be reduced but not eliminated through the implementation of mitigation measures recommended for the Project. In addition, the construction duration associated with Alternative 2 would be slightly shorter because of the need for smaller building foundations for the building when compared to those for the Project. The construction duration of this alternative would also be reduced by one-fifth due to the elimination of a story. However, the construction duration would not be shortened to the extent that noise impacts would be substantially decreased. As a result, construction of the All-Commercial Alternative and Project would result in short-term significant and unavoidable noise and vibration impacts. Given the fact that Alternative 2 has a slightly shorter construction period than the Project, Alternative 2 would have an incrementally lesser impact when compared to the Project.

A doubling of sound energy results in a 3 A-weighted decibel (dB[A]) increase in sound, which means that a doubling of sound wave energy (e.g., doubling the volume of traffic on a roadway) would result in a barely perceptible change in sound level. As described in the Traffic analysis later in this section, Alternative 2 would increase average daily trips (ADTs) by 1,527 trips when compared to the Project. **Table 5.0-4, Alternative Noise Level Comparison**, indicates that the All-Commercial Alternative would increase noise levels between 0.1 dB(A) and 1.4 dB(A) more than the Project.

Table 5.0-5
Alternative Noise Level Comparison

Roadway Segment	Existing (dB[A])	Project (dB[A])	Alt (dB[A])	Change From Project Due to Alt	Significant Impact?
W. Colorado Street between Pacific Avenue and Kenilworth Avenue	64.6	64.6	65.0	0.4	Yes
50 feet from centerline to receptor					
Harvard Street between Kenilworth Avenue and Pacific Avenue	53.3	54.0	54.9	0.9	No
35 feet from centerline to receptor (Scenario B)					
Oak Street between Kenilworth Avenue and Pacific Avenue	49.2	50.7	52.1	1.4	No
45 feet from centerline to receptor (Scenario C)					
Kenilworth Avenue between W. Colorado Street and Harvard Street	52.7	53.9	55.1	1.2	No
25 feet from centerline to receptor (All Scenarios)					
Pacific Avenue north of W. Colorado Street	62.3	62.3	63.1	0.8	No
50 feet from centerline to receptor					

*Source: Refer to **Appendix 5.0** for modeling results.*

Alternative 2 would result in a less than 3 dB(A) increase in the noise levels on affected roadway segments when compared to existing conditions—approximately 1 dB(A) higher than the Project. Noise generated by traffic along W. Broadway Street would generate noise levels along the exterior of the site that are at the City threshold exterior noise levels for multifamily residential uses of 65 dB(A). Under this alternative, the commercial space would not be sensitive to the ambient noise levels as there would be no residents or balconies impacted by noise. Therefore, this alternative would result in reduced noise impacts when compared to the Project.

Implementation of Alternative 2 would add new stationary noise sources to the site, as would the proposed Project. These would include rooftop-mounted equipment, a parking garage, and street sweepers. With the implementation of mitigation measures proposed for the Project, long-term operational impacts as a result of these noise sources under Alternative 2, like the Project, would be reduced to a less than significant level.

Population and Housing

The Project is not anticipated to induce unplanned substantial population growth in the City. Alternative 2 would not directly result in an increase in the use of existing neighborhood and community parks.[3] However, it would generate 190 new employment opportunities that could result in some households relocating to the City. It is estimated that approximately one-quarter of these employees could relocate to Glendale. Applying a 25 percent ratio, these employment positions could result in 48 of these new employees residing within the City of Glendale. Alternative 2 would indirectly result in the generation of new residents; however, the increase in the number of residents would be substantially less when compared with the number generated by the Project, and would thus result in similar but less than significant impacts with regard to inducing substantial population growth in an area. Therefore, development under this alternative, which is smaller than the proposed Project, would also be within the population and household growth projections for the City of Glendale and the Southern California Association of Governments (SCAG). Impacts associated with Alternative 2 would be less than significant and would be similar to those associated with the Project.

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 because commercial uses generate fewer calls for service than do residential uses. Alternative 2, like the proposed Project, would contribute tax revenue, which would help fund the Fire Department. Impacts to fire associated with Alternative 2 would be similar to those for the Project. Neither the Project nor Alternative 2 would result in significant project-specific impacts. However, like the Project, the All-Commercial Alternative would contribute to significant and unavoidable cumulative impacts on fire protection and emergency medical services in the City of Glendale.

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 because commercial uses generate fewer calls for service than do residential uses. Under either the Project or Alterative 2, any decrease and/or increase in calls within the City would not substantially impact the current officer-to-population ratio and would not result in the need for any new or the physical alteration to any existing

3 80,000 square feet / 1,000 square feet x 3.0 employees = 240 employees – 50 existing employees = 190 new employees.

governmental facility. Neither the Project nor Alternative 2 would result in significant project impacts, and impacts to police associated with Alternative 2 would be reduced to those associated with the Project. However, like the Project, this alternative would contribute to significant and unavoidable cumulative impacts on police protection services in the City of Glendale.

Schools

Alternative 2 includes all commercial space and would not result in the direct generation new students in the Glendale Unified School District. As discussed above, the additional employment opportunities generated by this Alternative may result in some additional households relocating to the City of Glendale. Pursuant to Government Code Section 65995, the Project Applicant is required to pay school impact fees to the Glendale Unified School District based on the current fee schedule for commercial development prior to the issuance of building permits. Payment of the school impact fees would mitigate any indirect impacts to a less than significant impact. School impacts would be similar under this Alternative when compared to those associated with the Project.

Recreation

Alternative 2 would not directly result in an increase in the use of existing neighborhood and community parks.[4] However, it would generate 190 new employment opportunities that would result in some households relocating to the City. It is estimated that approximately one-quarter of these employees could relocate to Glendale. Applying a 25 percent ratio, the employment positions would result in 48 of these new employees residing within the City of Glendale. The City currently has a parkland-to-resident ratio of approximately 1.46 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.

Alternative 2 would indirectly result in the generation of residents within the City who would utilize parks within the City of Glendale. As required by the adopted Development Impact Fee schedule, under implementation of Alternative 2, the Project Applicant would be required to pay the nonresidential commercial fees of $2.67 per square foot (project is considered a pipeline project and therefore is not required to pay full fee) for impacts to parks. The development impact fee payments are required to minimize a project's impact on park and recreation land and facilities. Under CEQA, the payment of full nexus study development impact fees constitutes mitigation of project-related impacts on park and recreation land and facilities. However, the fee payment is not considered to fully mitigate this impact because the fee amount to be paid does not equal the full fair-share fee for commercial projects, which

4 80,000 square feet / 1,000 square feet x 3.0 employees = 240 employees – 50 existing employees = 190 new employees.

was determined to be $6.60 per commercial square foot based on the increase of the development impact fees for parks and libraries to the full Consumer Price Index (CPI)– adjusted amount, pursuant to the City-adopted Ordinance No. 5280 and Resolution No. 14-10 on January 28, 2014. Alternative 2 would substantially lessen—but not avoid—the significant recreation impacts identified for the Project.

Traffic

Construction

Based on a rate of 1.135 worker trips per piece of construction equipment and a maximum of two pieces of construction equipment on any given day during project construction, a total of three trips per day would be generated. In general, the majority of the construction workers are expected to arrive at the site during off-peak hours (i.e., arrive prior to 7:00 AM), thereby avoiding the AM commuter peak hour period, and would remain on site throughout the day. Given the location of the site, most construction-related traffic would use Interstate 5 (I-5), and arriving and departing via nearby on/off ramps serving the I-5 and State Route 134.

As required by the City of Glendale, a Construction Traffic Control Plan will be implemented to minimize potential conflicts between construction activity and through traffic. The Construction Traffic Control Plan would identify all traffic control measures, signs, and delineators to be implemented by the construction contractor through the duration of excavation and construction activity. In addition, a Truck Haul Route Program would also be permitted by the Glendale Public Works Department and implemented to minimize conflicts between haul trucks traveling to and from the site and through traffic on roadways surrounding Alternative 2. The program would specify access points to the site and delineate approved haul routes.

As discussed in the following paragraphs, the All-Commercial Alternative would not result in a significant traffic impact. The volume of construction-related traffic would be similar to the Project because the size and scale of this alternative would be comparable to the Project. Therefore, the traffic impacts associated with construction activities are determine to be less than significant. Impacts would be further reduced with the implementation of the following required Construction Traffic Control Plan components:

- Maintain existing access for land uses in proximity of the site.
- Limit any potential lane closures to off-peak travel periods.
- Schedule receipt of construction materials during off-peak travel periods, to the extent possible.
- Limit the majority of construction-related traffic to off-peak periods.

- Coordinate deliveries to reduce the potential of trucks waiting to unload for extended periods of time.

- Prohibit parking by construction workers on adjacent streets and direct construction workers to available parking as determined in conjunction with City staff.

Operation—Intersection Analysis

Traffic generated by this Alternative was determined by multiplying the appropriate trip generation rate (0.96 per thousand square feet in the AM peak hour; 3.71 per thousand square feet in the PM peak hour; and 42.7 per thousand square feet total daily trips) by the quantities of land (80,000 square feet of commercial land use). The traffic generation rates are from the Institute of Transportation Engineers, *Trip Generation Manual*, 9th Edition.[5] Trip generation rates are predicated on the assumption that energy costs, the availability of roadway capacity, the availability of vehicles to drive, and our lifestyles remain similar to what we know today. Based on these trip generation rates, and taking trips generated by the existing office supply store into account Alternative 2 would result in a net generation of 2,336 daily trips, 53 AM peak-hour trips, and 127 PM peak-hour trips. Therefore, this Alternative would increase traffic by 1,434 daily trips, and 34 PM peak-hour trips when compared to the Project. This Alternative would decrease AM peak hour trips by 22 trips. The traffic generated by this alternative would not result in significant impacts.

The City of Glendale identifies traffic impacts as significant if the increase in the V/C (ICU) ratio equals or exceeds by 0.02 for an intersection operating at LOS D. Since the incremental amount of trips generated by this Alternative would not result in significant traffic impacts, as with the Project, V/C would remain unchanged under Alternative 2. Similar to the proposed Project, this alternative would result in less than significant impacts on the studied intersections.

Roadway Analysis

Since Alternative 2 would result in a net generation of 2,336 daily trips, this Alternative would not result in an increase in daily trips that would exceed the capacity of 2,500 daily trips in each of the scenarios. Therefore, the traffic generated by Alternative 2 would not significantly impact local residential streets in the City of Glendale, and the impact of Alternative 2 traffic on these roadways is less than significant. This Alternative would increase traffic by 1,434 daily trips when compared to the Project. As discussed below, the Alternative would incrementally increase traffic along these roadways, but would result in less than significant impacts, similar to the Project.

5 Institute of Transportation Engineers, *Trip Generation Manual*, 9th Edition, (September 2012).

Design Hazards

As mentioned previously, alternative egress movements would result in less than significant impacts to traffic. Furthermore, as with the proposed Project, outbound traffic from the site would be prohibited from turning left onto W. Broadway Street to travel eastbound during the afternoon peak hours, between 4:00 PM and 6:00 PM. Impacts would be similar to the Project.

Public Transit Analysis

Pursuant to the CMP guidelines, the All-Commercial Alternative is forecast to generate demand for 115 daily transit trips over a 24-hour period, 3 of which would occur during the AM peak hour and 7 of which would occur during the PM peak hour. The calculations for the morning, evening, and daily traffic conditions are as follows:

- Morning (AM) Peak Hour = 53 x 1.4 x 0.035 = 3 Transit Trips
- Evening (PM) Peak Hour = 127 x 1.4 x 0.035 = 7 Transit Trips
- Daily = 2,336 x 1.4 x 0.035 = 115 Transit Trips

Alternative 2 would result in a decrease of one transit trip in the AM peak hour and an increase of 2 transit trips in the PM peak hour when compared to the Project. This Alternative would result in an increase in 70 daily transit trips when compared to the Project. Transit service is provided by Metro and the Beeline Service. The Metro system includes service along W. Broadway and Pacific Avenue.

Based on the projected increased demand for transit services generated by Alternative 2, it is anticipated that the existing transit service in the Project area would adequately accommodate the Alternative 2–generated transit trips. Thus, based on the calculated number of generated transit trips, no Alternative 2 impacts on existing or future transit services in the Project area are expected to occur, and impacts would be similar to those created by the Project.

Public Utilities

Water

As with the Project, Alternative 2 would result in an increase in water demand in the City. The All-Commercial Alternative would result in a demand for water of 12.01 afy, a 63 percent reduction when compared to the Project demand of 32.9 afy. 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 substantially 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 and less than the Project.

Sewer

Alternative 2, like the Project, would result in an increase in sewage generation in the City. Alternative 2 would result in an increase of 8,570 gallons of sewage per day, while the Project would result in an increase of 22,862 gallons of sewage per day. There is adequate treatment capacity at the Hyperion Treatment Plant to accommodate either Alternative 2 or the Project. The City imposes a sewer capacity increase fee on new developments that lead to an increase in the volume of wastewater discharged to the collection system. The All-Commercial Alternative's sewage increase to the lines in the City's sewer capacity would be mitigated through payment of the sewer capacity increase fee, as required similar to the Project, and Alternative 2 impacts would be reduced to a less than significant level. Sewerdemand impacts under both Alternative 2 and the Project would be less than significant and similar to the Project.

Solid Waste

Alternative 2, like the Project, would result in an increase in the demand for solid waste services in the City. 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. Alternative 2 would generate an increase of 78.2 tons of solid waste per year. When compared to the Project increase of 151.3 tons of solid waste per year, Alternative 2 would result in a substantially lesser amount of solid waste and thus substantially fewer impacts. Consequently, the All-Commercial Alternative is considered to be environmentally superior to the Project. Neither this Alternative nor the Project would result in significant project level impacts on landfill capacities. However, given County landfill capacity, both Alternative 2 and the Project would contribute to cumulative significant and unavoidable solid waste impacts.

Alternative 3—Height and Density Reduction Alternative

The Height and Density Reduction Alternative considers development of the entire 1.78-acre site with a reduction of height by 2 stories. This alternative would include the development of 99 multifamily residential units and 18,200 square feet of commercial space in a 3-story building. This alternative would

allow for a 3-story Project building and a single-level subterranean parking structure consisting of 202 parking spaces.[6] The layout of the land uses under this alternative would not change.

By reducing the amount of development, the construction duration of this alternative would also be reduced. In addition, a reduction in the amount of residential dwelling units would reduce the amount of direct population generated under this alternative.

Aesthetics

Under Alternative 3, the height of the structure would be 40 feet above grade, lower when compared to the Project. The number of stories would be reduced from 5 stories under the Project to 3 stories under Alternative 3. The residential units would be placed on the second and third floors, while the ground floor would consist of commercial uses and open space. The view of this alternative from the north to the south would primarily consist of the rear frontage of the building proposed, similar to the view of the Project, except with respect to the building's height. Alternative 3 would be subject to the same design review process and the same regulations concerning light and glare as the proposed Project. The shadows cast to the north would be incrementally reduced because of the 25-foot reduction in height. All other visual impacts under this alternative would be similar when compared to the Project. Since impacts to visual resources associated with the Project would be less than significant, the impacts associated with Alternative 3 would be reduced than are those associated with the Project.

Air Quality

Construction activities (e.g., equipment-use assumptions) under Alternative 3 would be similar to those of the Project on a daily basis. The Height and Density Reduction Alternative would involve a reduced intensity of all residential and commercial uses, and would result in a two fewer aboveground levels when compared to the Project. Therefore, construction activities would occur over a shorter period when compared to the Project.

Like the Project, Alternative 3 would not generate daily construction and operational emissions of VOCs, NOx, CO, SOx, PM10, and PM2.5 that would exceed the thresholds of significance recommended by the SCAQMD. Neither the Height and Density Reduction Alternative nor the Project would result in significant air quality impacts; however, based on the modeling, impacts associated with Alternative 3 would be reduced when compared to those associated with the Project. Therefore, Alternative 3 would result in comparatively less air quality impacts than those under the Project.

6 Note: The parking spaces are determined according to the Glendale Municipal Code Section 30.32 and would provide 129 parking spaces for studio, 1- and 2-bedroom units and 73 spaces for 18,200 square feet commercial office space for a total of 202 parking spaces.

Alternative 3 would decrease daily and peak hour trips when compared to the number of trips generated by the Project. The Project is estimated to result in a net total increase of 2,085 metric tons of carbon dioxide equivalents (MTCO2E) per year. Alternative 3 would reduce the number of residential units by 50 percent, which would therefore result in a net total increase of approximately 1,043 MTCO2E per year. Under the GHG guidance, Alternative 3 would result in lower GHG emissions and would remain below the GHG guidance threshold. Accordingly, Alternative 3 would result in comparatively fewer greenhouse gas emission impacts than those under the Project. Impacts would remain less than significant.

Land Use and Planning

Alternative 3 would establish residential units on the Project site that are allowed by the current General Plan and Zoning designations. The intensity of the residential dwellings would be within the maximum amounts allowed of 86 dwelling units 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, Alternative 3 would not conflict with any of the goals, objectives, or policies of the Glendale General Plan. The Height and Density Reduction Alternative would result in the redevelopment of the Project site and the development of new residential uses in western Glendale, which are presently served by existing utilities and public services. As with the Project, Alternative 3 would not conflict with the goals of the Redevelopment Plan and would not result in a significant impact with regard to land use. Impacts associated with Alternative 3 would be similar to the Project.

Noise

Development activities associated with the Project and Alternative 3 during construction, such as earthmoving and construction of on-site infrastructure, would involve the use of heavy equipment, such as a backhoe, dozer, loaders, concrete mixers, forklifts, and cranes. Under both the Project and Alternative 3, these construction equipment sources would cause significant noise impacts. For both scenarios, these impacts could be reduced but not eliminated through the implementation of mitigation measures recommended for the Project. As a result, construction of the Project under both scenarios would result in short-term significant and unavoidable noise and vibration impacts. It should be noted that the construction duration associated with Alternative 3 would be shorter than the Project because of the reduced residential and commercial uses. Therefore, the Height and Density Reduction Alternative would result in fewer days of construction noise, but would not avoid or substantially lessen a significant noise impact.

A doubling of sound energy results in a 3.0 dB(A) increase in noise level. Like the proposed Project, this alternative would result in a less than 2 dB(A) increase in the noise levels on affected roadway segments. Noise generated by traffic along W. Colorado Street would generate noise levels along the exterior of the site that are above the City Municipal Code exterior noise level of 65 dB(A). Under either the proposed Project or Alternative 3, these exterior noise levels would result in a significant impact. For both scenarios, these impacts could be reduced but not eliminated through the implementation of mitigation recommended for the Project. Therefore, the development of either Alternative 3 or the Project would result in long-term significant and unavoidable noise and vibration impacts.

Implementation of Alternative 3 would add new stationary noise sources to the site, as would the proposed Project. These would include rooftop-mounted equipment, loading docks, parking garages, street sweepers, and on-site entertainment uses. With the implementation of mitigation measures proposed for the proposed Project, long-term operational impacts as a result of these noise sources under Alternative 3, like those for the proposed Project, would be reduced to a less than significant level.

Population and Housing

The Project is not anticipated to directly or indirectly induce substantial population growth in the area. Alternative 3 would result in 258 residents, a decrease of 211 residents when compared to the Project. All of the residents anticipated to occupy the Project site after development of the Project are within the population and household projections for the City of Glendale. Therefore, impacts associated with the Height and Density Reduction Alternative would be similar to those for the Project. Neither the Project nor Alternative 3 would result in a significant impact.

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 would result in fewer calls for service because of the reduced number of dwelling units. Under either the Project or Alterative 3, any increase in fire protection or emergency medical services within the City would not substantially impact the current firefighter-to-population ratio and would not result in the need for any new or the physical alteration to any existing governmental facility. Neither the Project nor Alternative 3 would result in a significant project-specific impact, and impacts to fire protection associated with Alternative 3 would be similar to those for the Project. However, as with the Project, Alternative 3 would contribute to significant and unavoidable cumulative fire impacts in the City of Glendale.

Police Protection

Like the Project, the Height and Density Reduction Alternative would increase demand on the City of Glendale Police Department for calls for service. Alternative 3, however, would result in fewer calls for service because of the reduced number of dwelling units. Under either the Project or Alterative 3, any increase in calls within the City would not substantially impact the current officer-to-population ratio and would not result in the need for any new or the physical alteration to any existing governmental facility. Impacts to police services associated with Alternative 3 would be similar to the Project. Neither the Project nor Alternative 3 would result in significant project-specific impacts. However, as with the Project, the Height and Density Reduction Alternative would contribute to significant and unavoidable cumulative police impacts in the City of Glendale.

Schools

Alternative 3, like the proposed Project, would generate new students in the Glendale Unified School District. The development of the Project would directly result in the new generation of approximately 20 students in grades K through 6; 6 students in grades 7 and 8, and 8 high school students—a total of 34 new students. Alternative 3 would result in a similar increase in the number of students within the Glendale Unified School District because a multifamily generation rate is used for any multifamily size unit. Since this alternative would provide 99 dwelling units, the number of students would be reduced by 16 students when compared to the Project. Government Code Section 65995 requires the payment of school fees to mitigate the impact of the project on local schools, and impacts under the Height and Density Reduction Alternative would be reduced to less than significant. Therefore, impacts associated with Alternative 3 would be similar to the Project. Neither Alternative 3 nor the Project would result in significant impacts on local schools.

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 1.46 acres of parkland for every 1,000 residents, while the City's park planning standard is 6 acres of neighborhood and community parkland per 1,000 residents. Existing park facilities are currently heavily used because of the deficiency in parkland in the City. Alternative 3 would result in the direct generation of 258 persons, whereas the Project would result in direct generation of 469 persons. These persons would utilize parks within the City of Glendale. As required by the adopted Development Impact Fee schedule, the Project Applicant would pay the phase-in fees of $7,000 per residential unit and $2.67 per square foot of commercial space (project is considered a pipeline project and therefore is not required to pay full fee) for impacts to parks. The development impact fee payments are required to minimize a

project's impact on park and recreation land and facilities. Under CEQA, the payment of the full fee under the nexus study development impact fees constitutes mitigation of project-related impacts on park and recreation land and facilities. However, the fee amount to be paid does not equal the full fair-share per unit fee for multifamily residential projects, which was determined to be $18,751 per residential unit and $6.60 per commercial square foot, based on the increase of the development impact fees for parks and libraries to the full Consumer Price Index (CPI)-–adjusted amount, pursuant to the City-adopted Ordinance No. 5280 and Resolution No. 14-10 on January 28, 2014. Consequently, Alternative 3, like the proposed Project, would also result in significant and unavoidable project-specific and cumulative park and recreation impacts. However, Alternative 3 would decrease the direct population by approximately 211 residents, thus decreasing the number of residents utilizing City parks and substantially reducing, but not avoiding, the significant recreation impacts identified for the Project.

Traffic

Construction

Based on a rate of 1.135 worker trips per piece of construction equipment and a maximum of two pieces of construction equipment on any given day during project construction, a total of three trips per day would be generated. In general, the majority of the construction workers are expected to arrive at the site during off-peak hours (i.e., arrive prior to 7:00 AM), thereby avoiding the AM commuter peak hour period, and would remain on site throughout the day. Given the location of the site, most construction-related traffic would use Interstate 5 (I-5), and arriving and departing via nearby on/off ramps serving the I-5 and State Route 134.

As required by the City of Glendale, a Construction Traffic Control Plan will be implemented to minimize potential conflicts between construction activity and through traffic. The Construction Traffic Control Plan would identify all traffic control measures, signs, and delineators to be implemented by the construction contractor through the duration of excavation and construction activity. In addition, a Truck Haul Route Program would also be permitted by the Glendale Public Works Department and implemented to minimize conflicts between haul trucks traveling to and from the site and through traffic on roadways surrounding Alternative 3. The program would specify access points to the site and delineate approved haul routes.

As discussed in the following paragraphs, this Alternative would not result in a significant traffic impact. The volume of construction-related traffic would be incrementally less than the Project because the size and scale of this alternative would be reduced in comparison to the Project. Therefore, the traffic impacts associated with construction activities are determine to be less than significant. Impacts would

be further reduced with the implementation of the following required Construction Traffic Control Plan components:

- Maintain existing access for land uses in proximity of the site.
- Limit any potential lane closures to off-peak travel periods.
- Schedule receipt of construction materials during off-peak travel periods, to the extent possible.
- Limit the majority of construction-related traffic to off-peak periods.
- Coordinate deliveries to reduce the potential of trucks waiting to unload for extended periods of time.
- Prohibit parking by construction workers on adjacent streets and direct construction workers to available parking as determined in conjunction with City staff.

Operation – Intersection Analysis

Traffic generated by this Alternative was determined by multiplying the appropriate trip generation rate by the quantities of land, as shown in **Table 5.0-5, Alternative 3 Trip Generation.** The traffic generation rates are from the Institute of Transportation Engineers, *Trip Generation Manual*, 9th Edition.[7] Trip generation rates are predicated on the assumption that energy costs, the availability of roadway capacity, the availability of vehicles to drive, and our lifestyles remain similar to what we know today. A 10 percent internal trip capture reduction was applied to the Alternative 3 uses. Internal trip capture is based on the premise that some of the employees, residents, and guests, as well as adjacent commercial parcels, would use this Alternative uses, thereby reducing some of the trips that this Alternative would otherwise generate. Furthermore, a 10 percent reduction was applied to the residential units of Alternative 3 based specifically on the fact that the location of this Alternative in Glendale provides convenient local/regional transit service.

Based on these trip generation rates, and taking trips generated by the existing office supply store into account Alternative 3 would result in a net generation of 213 daily trips, 61 AM peak-hour trips, and 116 PM peak-hour trips. The Project would generate 902 net average daily trips (ADTs) including 75 AM peak-hour trips and 93 PM peak-hour trips. Therefore, this Alternative would decrease traffic by 689 daily trips, 38 AM peak hour trips, and 63 PM peak-hour trips when compared to the Project. The traffic generated by this alternative would not result in significant impacts.

7 Institute of Transportation Engineers, *Trip Generation Manual*, 9th Edition, (September 2012).

Table 5.0-5
Alternative 3 Trip Generation

			AM Peak Hour				PM Peak Hour				Daily Trips	
Land Use	**Size**	**Units**	**Trip Rate**	**In-bound**	**Out-bound**	**Total**	**Trip Rate**	**In-bound**	**Out-bound**	**Total**	**Rate**	**Total**
Trip Generation Rate												
Residential Apartments	99	du	0.51	20% 11	80% 40	51	0.62	65% 40	35% 22	62	6.65	659
10% TDM Measures Reduction[1]				*-2*	*-4*	*-6*		*-4*	*-3*	*-7*		*-66*
Retail	18.2	tsf	0.96	62% 11	38% 7	18	3.71	48% 32	52% 36	68	42.7	778
10% less Walk-in/Internal Capture Reduction[2]				*-2*	*-1*	*-2*		*-4*	*-4*	*-7*		*-78*
Subtotal				***18***	***42***	***61***		***64***	***51***	***116***		***1,293***
Existing Land Use Removed												
Office Supply Superstore[3]	25.3	tsf	0.96	48% -12	52% -12	-24	3.4	53% -46	47% -40	-86	42.7	-1,080
Subtotal				***-12***	***-12***	***-24***		***-46***	***-40***	***-86***		***-1,080***
Net Trip Generation				**6**	**30**	**37**		**18**	**11**	**30**		**213**

Source: JB & Associates. Traffic Impact Analysis – 515 W. Broadway Project (September 22, 2014).
Note: DU = dwelling units; tsf = thousand square feet.
1. Transit reduction applied to account for the proximity of the project to conveniently located transit routes and walkability to nearby land uses.
2. A Walk-in/Internal Capture Rate was applied to account for walk-in patrons and the mixed-use characteristics of the development.
3. ITE Land Use Code 820 (Retail) used for AM Peak Hour Trip Rate due to lack of data in "Trip Generation Manual"

In the City of Glendale, an impact is considered to be significant for signalized intersections if the project-related increase in the V/C exceeds 0.02 at an intersection operating at LOS D or worse. The Project would not change the volume-to-capacity (V/C) ratio when compared to the existing conditions. As previously mentioned, this Alternative would decrease daily and peak trips when compared to the Project. Since impacts to study intersections associated with the Project would be less than significant, and Alternative 3 would result in a decrease in traffic, the impacts associated with Alternative 3 would also be less than significant.

Roadway Analysis

Since Alternative 3 would result in a net generation of 213 daily trips, a decrease of 689 trips in comparison with the Project, this Alternative would not result in any increase in daily trips that would exceed the capacity of 2,500 daily trips in each of the scenarios. Therefore, the traffic generated by Alternative 3 would not significantly impact local residential streets in the City of Glendale, and the impact of Alternative 3 traffic on these roadways is less than significant. The Alternative would

incrementally increase traffic along these roadways in comparison with existing conditions, but would result in less than significant impacts, similar to the Project.

Design Hazards

As mentioned previously, alternative egress movements would result in less than significant impacts to traffic. Furthermore, as with the proposed Project, outbound traffic from the site would be prohibited from turning left onto W. Broadway Street to travel eastbound during the afternoon peak hours, between 4:00 PM and 6:00 PM. Impacts would be similar to the Project.

Public Transit Analysis

Pursuant to the CMP guidelines, Alternative 3 is forecast to generate demand for 11 daily transit trips over a 24-hour period, 2 of which would occur during the AM peak hour and 2 of which would occur during the PM peak hour. The calculations for the morning, evening, and daily traffic conditions are as follows:

- Morning (AM) Peak Hour = 37 x 1.4 x 0.035 = 2 Transit Trips
- Evening (PM) Peak Hour = 30 x 1.4 x 0.035 = 2 Transit Trips
- Daily = 213 x 1.4 x 0.035 = 11 Transit Trips

This Alternative would result in a decrease of 34 daily transit trips when compared to the Project. Transit service is provided by Metro and the Beeline Service. The Metro system includes service along W. Broadway and Pacific Avenue.

Based on the projected increased demand for transit services generated by Alternative 3, it is anticipated that the existing transit service in the Project area would adequately accommodate the Alternative 3–generated transit trips. Thus, based on the calculated number of generated transit trips, no Alternative 3 impacts on existing or future transit services in the Project area are expected to occur, and impacts would be similar to those created by the Project.

Public Utilities

Water

As with the Project, Alternative 3 would result in an increased water demand in the City. However, Alternative 3 would result in a demand for water of 17.6 afy, a 47 percent reduction when compared to the Project demand of 32.9 afy. The provision of water as a result of the Project's implementation would fall within the projections of the Glendale Water and Power (GWP). Therefore, Alternative 3, which

would demand less water than the Project, would also fall within the established GWP projections. Impacts associated with Alternative 3 would be similar to those for the Project. For both the Height and Density Reduction Alternative and the proposed Project, water demand impacts would be less than significant.

Sewer

Alternative 3, like the Project, would result in an increase in sewage generation in the City. Alternative 3 would result in an increase of 11,942 gallons of sewage per day, while the Project would result in an increase of 22,862 gallons of sewage per day. There is adequate treatment capacity at the Hyperion Treatment Plant to accommodate either Alternative 3 or the Project. The City imposes a sewer capacity increase fee on new developments that lead to an increase in the volume of wastewater discharged to the collection system. The Height and Density Reduction Alternative's sewage increase to the lines in the City's sewer capacity would be mitigated through payment of the sewer capacity increase fee, as required by the Project. Similar to the project, impacts associated with Alternative 3 would be reduced to a less than significant level.

Solid Waste

Alternative 3, like the Project, would result in an increase in the demand for solid waste services in the City. There is adequate landfill capacity at the Scholl Canyon Landfill to accommodate solid waste generated by either Alternative 3 or the Project. Alternative 3 would generate an increase of 92.2 tons of solid waste per year compared to the Project increase of 151.3 tons of solid waste per year. Therefore, impacts under both Alternative 3 and the Project would be less than significant. However, the Height and Density Reduction Alternative would result in substantially fewer impacts than the Project. Given County landfill capacity, both the Alternative and the Project would contribute to cumulative significant and unavoidable solid waste impacts.

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 impacts identified for the Project.

According to the 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, Alternative 3—Height and Density Reduction Alternative would be considered environmentally superior because it would

substantially lessen the overall level of impact when compared to the Project due to the reduction of residences and elimination of shade and shadow impacts on the Project site. Overall, the significant and unavoidable short-term noise and vibration impacts during construction, the Project on-site noise impact due to vehicle operations, the Project and cumulative impacts to recreation facilities, and the cumulative impacts to fire, police, and solid waste would not be eliminated by this alternative.

Furthermore, Alternative 3 would not meet certain objectives of the Project. Alternative 3 would provide 81 fewer residential units. Fewer units and less floor space would result in less property tax revenue to the City than what would be provided by the Project. Fewer housing opportunities in an urban setting would also be provided under Alternative 3, thus partially meeting the objectives of Project. Finally, the reduced density under this alternative may not be sufficient to offset the cost of the land, and thus may not be economically feasible for the Applicant for this reason.

Alternative 2—All-Commercial Alternative would avoid the significant exterior noise impact because the 65 dB(A) exterior threshold only applies to private outdoor balconies or patios. Alternative 2 would also result in a substantial reduction in the significant and unavoidable recreation impact when compared to the Project. However, the significant and unavoidable short-term and cumulative noise and vibration impacts during construction and the cumulative impacts to fire, police, and solid waste would not be eliminated by Alternative 2. Furthermore, the All-Commercial Alternative would increase the amount of air emissions, greenhouse gas emissions, vehicle-related noise, and vehicular traffic generated when compared to the Project. Therefore, Alternative 2 would not be considered the environmentally superior alternative.