

5 Alternatives

5.1 Introduction

The identification and analysis of alternatives is a fundamental concept under CEQA. CEQA requires the consideration of alternative development scenarios and an analysis of the potential impacts associated with those alternatives. Through comparison of these alternatives to the proposed project, the advantages of each can be weighed and analyzed. Section 15126.6(a) of the CEQA Guidelines requires that an EIR “describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.”

Additionally, Sections 15126.6(e) and (f) of the CEQA Guidelines state:

- The specific alternative of “no project” shall also be evaluated, along with its impact. If the environmentally superior alternative is the “no project” alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.
- The range of alternatives required in an EIR is governed by a “rule of reason” that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the proposed project. Of those alternatives, the EIR needs to examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the proposed project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision-making.

Pursuant to the CEQA Guidelines stated above, a range of alternatives to the proposed project is considered and evaluated in this EIR. The discussion in the chapter provides:

- A description of alternatives considered
- An analysis of whether the alternatives meet most of the objectives of the proposed project
- A comparative analysis of the alternatives under consideration and the proposed project, which will determine if the alternatives are capable of eliminating or reducing the significant environmental effects of the proposed project

5.2 Criteria for Alternatives Analysis

The potential alternatives were evaluated in terms of their ability to meet the basic project objectives, while reducing or avoiding the environmental impacts of the proposed project identified in Chapter 3, Environmental Impact Analysis, of this EIR. As discussed in Chapter 2 of this EIR, the project’s objectives are as follows:

- Provide an industrial and office development project consistent with the site’s land use regulations that maximizes the development potential of the site
- Provide an industrial and office development project that is compatible and complementary with the existing surrounding and adjacent land uses and facilities

- Provide a modern, urban development site in place of the existing vacant site, which was previously a natural gas processing and compression plant
- Provide an economically-viable development program for the property
- Increase the City of Long Beach's professional industrial and office inventory, which would accommodate additional employment within the city
- Maintain consistency with the City of Long Beach General Plan and zoning ordinances
- Provide needed infrastructure improvements, including roadway, sidewalk, and park improvements, which would correct existing public infrastructure deficiencies

5.3 Alternatives Considered but Rejected

In addition to specifying that the EIR evaluate “a range of reasonable alternatives” to the project, Section 15126.6(c) of the CEQA Guidelines requires that an EIR identify any alternatives that were considered but were rejected as infeasible.

5.3.1 Alternative Site

Section 15126.6(f)(2) of the CEQA Guidelines addresses alternative locations for a project. The key question and first step in the analysis is whether any of the significant impacts of the proposed project would be avoided or substantially lessened by putting the proposed project in another location. Only locations that would avoid or substantially lessen any of the significant impacts of the project need to be considered for inclusion in the EIR. Further, CEQA Guidelines Section 15126.6(f)(1) states that among the factors that may be taken into account when addressing the feasibility of alternative locations are whether the project proponent can reasonably acquire, control, or otherwise have access to the alternative site (or the site is already owned by the proponent). An alternative site location for this project was rejected because the site is owned by the project proponent, and the project proponent does not own any additional sites within the city that could accommodate the proposed project.

5.4 Evaluation of Alternatives

5.4.1 Alternative 1: No Project/No Development Alternative

CEQA Guidelines require analysis of the No Project Alternative. According to Section 15126.6(e), “the specific alternative of ‘no project’ shall also be evaluated, along with its impacts. The ‘no project’ analysis shall discuss the existing conditions at the time the NOP is published, at the time environmental analysis is commenced, as well as what would be reasonably expected to occur in the foreseeable future if the proposed project was not approved, based on current plans and consistent with available infrastructure and community services.”

The No Project/No Development Alternative assumes that the project site would not be developed with the proposed project, and the project site would remain in its current condition and current uses. The site is currently vacant and previously disturbed.

Air Quality

This alternative would result in no increase of emissions of criteria air pollutants, as no construction or development would occur. This alternative would not result in the generation of additional criteria pollutant emissions; therefore, operational emissions would be less than the proposed project. This alternative would avoid a potential significant impact from fugitive dust.

Geology and Soils

This alternative would avoid any potential impacts related to geology and soils, as no new development would occur on the project site. This alternative would avoid the potential impacts associated with developing structures within 600 feet of an EFZ, on liquefiable soil, and on expansive soils.

Greenhouse Gas Emissions

Under this alternative, no GHG impacts would occur, as no new emissions would occur. Implementation of this alternative would not avoid a significant GHG impact associated with the proposed project, as no significant GHG impact has been identified.

Noise

This alternative would avoid potential construction and operational noise and vibration impacts associated with the proposed project, as no new industrial development would be introduced to the project site. This alternative would avoid the potential temporary construction noise that would result from development of the business park/warehouse complex. However, implementation of this alternative would not avoid a significant operational noise impact associated with the proposed project, as no significant operational noise impact has been identified.

Transportation

This alternative would avoid any significant increases in traffic, as no new development would occur onsite. The alternative would avoid a significant and unavoidable impact at the intersections of Orange Avenue and Spring Street, Orange Avenue and 32nd Street, and Orange Avenue and I-405 Southbound Ramps.

Conclusion

Under this alternative, all the impacts associated with implementation of the proposed project would be avoided, including impacts on air quality, geology and soils, and noise. In addition, the project's significant and unavoidable traffic impact would be avoided. This alternative would not result in impact on the remaining issue areas. However, as shown in Table 5.4-1, implementation of this alternative would not meet any of the basic objectives of the project.

Table 5.4-1. Attainment of Project Objectives – No Project/No Development Alternative

Project Objective	Does No Project/No Development Alternative Meet Project Objectives?
Provide an industrial and office development project consistent with the site's land use that maximizes the development potential of the site	No. The No Project/No Development Alternative assumes that the project site would not be developed with the proposed project. No industrial or office development would be developed.
Provide an industrial and office development project that is compatible and complementary with the existing, surrounding, and adjacent land uses and facilities	No. The No Project/No Development Alternative assumes that the project site would not be developed with the proposed project. No industrial or office development would be developed.
Provide a modern, urban development site in place of vacant site, which was previously a natural gas processing and compression plant	No. The No Project/No Development Alternative assumes that the project site would not be developed with the proposed project. The project site would remain vacant.
Provide an economically-viable development program for the property	No. The No Project/No Development Alternative assumes that the project site would not be developed with the proposed project. No economically-viable development program would be created.
Increase the City of Long Beach's professional, industrial, and office inventory, which would accommodate additional employment within the city	No. The No Project/No Development Alternative assumes that the project site would not be developed with the proposed project. No additional employment would be created.
Maintain consistency with the City of Long Beach General Plan and zoning ordinances	No. The No Project/No Development Alternative would not develop industrial land uses for the project site for which the site is currently zoned.
Provide needed infrastructure improvements including roadway, sidewalk, and park improvements, which would correct existing public infrastructure deficiencies	No. The No Project/No Development Alternative assumes that the project site would not be developed with the proposed project, which includes infrastructure improvements to the roadway, sidewalk, and park. Existing public infrastructure deficiencies would remain.

5.4.2 Alternative 2: Reduced Project

The Reduced Project Alternative proposes two buildings on the project site. The Reduced Project Alternative would include development of 2 new concrete “tilt-up” buildings for new industrial, with accessory office uses, for total of 88,557 SF of floor area. The 2 buildings vary in size and each include mezzanine space, and 25 percent of the square footage of each building is office area. Building 1 would be 39,812 SF, inclusive of 3,000 SF of mezzanine, and allow up to 9,953 SF of office area. Building 2 would be 48,745 SF, inclusive of 3,000 SF of mezzanine, and allow up to 12,186 SF of office area. The buildings would be 28 feet in height.

Vehicular access to the project site would be provided via new driveways along Spring Street and Orange Avenue. A total of 89 auto parking spaces would be provided, including 4 Americans with Disabilities Act accessible, 2 van accessible, 6 clean air vehicle, and 4 electric vehicle charging stations. Additionally, 5 trailer parking spaces would be provided.

Off-site street improvements and off-site park improvements would be the same as described for the proposed project.

Air Quality

As with the proposed project, implementation of this alternative would result in an increase in air emissions. Construction of the Reduced Project Alternative would require the same construction phases and the same construction equipment; however, the equipment would be used for a shorter duration. Similar to the proposed project, the Reduced Project Alternative would not result in an exceedance of SCAQMD thresholds for short-term construction related emissions or long-term operation of the project. The potential for fugitive dust remains significant and implementation of **Mitigation Measure AQ-1** would be required to reduce potential impact to less than significant.

Similar to the proposed project, the Reduced Project Alternative would have potential long-term operational air quality impacts from mobile source emissions associated with project-related vehicular trips and stationary source emissions from on-site energy consumption; however, the emissions rates for on-site operational activities would not exceed the LSTs.

Geology and Soils

Implementation of this alternative would result in similar impacts related to geology and soils as the proposed project, as the project site would be graded to accommodate development, and new buildings would be located on the project site. Similar to the proposed project, the project site would be within 600 feet of an EFZ and the project site contains liquefiable and expansive soils. Potential significant impacts from building structures on liquefiable and expansive soil and in close proximity to an EFZ would remain significant, and implementation of **Mitigation Measure GEO-1** would be required to reduce potential significant impacts to less than significant.

Greenhouse Gas Emissions

Implementation of this alternative would not avoid or reduce a potential GHG impact, as no significant impact related to this environmental issue has been identified. GHG emissions would be generated during construction of this alternative. Additionally, operation of this alternative would generate GHG emissions through motor vehicle trips to and from the project site; energy use (natural gas and generation of electricity consumed by the proposed project); solid waste disposal; and generation of electricity associated with water supply, treatment, and distribution and wastewater treatment. The total annual GHG emissions would be less than the proposed project of 2,290 MT of CO₂e and therefore, would be less than SCAQMD's screening threshold of 10,000 MT of CO₂e per year and also less than SCAQMD's screening threshold for mixed-use projects of 3,000 MT of CO₂e per year.

Noise

Implementation of this alternative would result in a similar impact on noise associated with the proposed project. At its closest point, the construction activity would be located within 150 feet of the existing church to the east, across Orange Avenue. The maximum and average noise levels would be the same as the proposed project, which would result in a significant impact. Compliance with **Mitigation Measure NOI-1** would require limited work hours, which would result in a less than significant impact.

Traffic noise associated with project construction is not anticipated to be a significant source of noise. Traffic noise is not greatly influenced by lower levels of traffic, such as those associated with the project's construction effort. For example, traffic levels would have to double for traffic noise on adjacent roadways to increase by 3 dBA. The project's construction traffic on adjacent roadways would increase hourly traffic volumes by much less than a factor of 2; therefore, the increase in construction related traffic noise would be less than 3 dBA and is not significant.

Similar to the proposed project, no significant off-site traffic noise impacts would occur under existing year conditions, and stationary source noise impacts would be lower than the City of Long Beach's District 1 daytime threshold of 70 dBA L_{max} , due to the distance from sensitive receptors.

Similar to the proposed project, implementation of the Reduced Project Alternative would result in less than significant impacts from construction vibration. The church east of the project site would be located approximately 200 feet from the building footprint where pile driving may occur. Following FTA vibration guidance, at 200 feet, the pile driver vibration level would be 77 VdB. This level would not exceed FTA's daytime annoyance threshold of 78 VdB. Therefore, the impacts from construction vibration would be less than significant.

Transportation

Similar to the proposed project, during construction, construction-related traffic, such as deliveries of equipment and materials and construction worker traffic, would be generated. However, construction traffic would be temporary and would not substantially interfere with the existing traffic load and capacity of the street system.

As with the proposed project, operation of the Reduced Project Alternative would generate passenger car and truck trips to the project site. However, the Reduced Project Alternative would reduce the amount of development from 160,673 SF to 88,557 SF and ultimately reduce the total average daily trips from 757 to 417. The Reduced Project Alternative would generate 66 new AM peak hour trips and 72 new PM peak hour trips, which is 45 percent less than the proposed project (Appendix F). However, 60 percent of the project trips pass through the intersection of Orange Avenue and Spring Street and even with a reduction in 45 percent of the peak hour trips, a significant impact would be triggered at this intersection. **Mitigation Measures TRAN-2 and TRAN-3** would be implemented to reduce significant impacts at Orange Avenue and Spring Street; however, impacts would be significant and unavoidable because the LOS would deteriorate from LOS D.

Due to the project distribution pattern, Orange Avenue and 32nd Street and Orange Avenue at I-405 Southbound Ramps would result in a significant impacts, similar to the proposed project. **Mitigation Measure TRAN-1** would reduce impacts at Orange Avenue and 32nd Street; however, this improvement is subject to approval by and is the responsibility of the City of Signal Hill. The City of Signal Hill does not have any plans to improve the impacted intersection, or if it does have plans, those plans are either not funded or on a construction schedule that would not allow for those improvements to be operational by the project's opening year. Therefore, improvements at Orange Avenue and 32nd are within the responsibility and jurisdiction of another public agency and not the City of Long Beach, the impact at Orange Avenue and 32nd Street during PM peak hours is considered significant and unavoidable. Similarly, **Mitigation Measures TRAN-4 and TRAN-5** would reduce impacts at Orange Avenue at I-405 Southbound Ramps. However, a significant and unavoidable impact would occur because these measures are the responsibility of and subject to approval by Caltrans. Caltrans does not have any plans to improve the impacted intersection, or if it does have plans, those plans are either not funded or on a construction schedule that would not allow for those improvements to be operational

by the project’s opening year. Furthermore, the City of Long Beach has no independent control or jurisdiction over the implementation of the improvements at Orange Avenue and I-405 Southbound Ramps.

Conclusion

Under the Reduced Project Alternative, impacts would be similar to the proposed project for all resource sections, with the exception of Transportation. Transportation impacts would be reduced under the Reduced Project Alternative compared to the proposed project because total daily trips would be reduced from 757 to 417; however, 60 percent of the project trips pass through the intersection of Orange Avenue and Spring Street and even with a reduction in 45 percent of the peak hour trips, a significant impact would be triggered at this intersection. Additionally, improvements would be required at City of Signal Hill jurisdictional intersection Orange Avenue and 32nd Street and Caltrans jurisdictional intersection Orange Avenue at I-405 Southbound Ramps. The City of Long Beach has no independent control or jurisdiction over the implementation of the identified improvements at these intersections. Since the responsible agencies do not have any plans to improve the impacted intersections, or if they do have plans, those plans are either not funded or on a construction schedule that would not allow for those improvements to be operational by the project’s opening year, impacts would be significant and unavoidable. As shown in Table 5.4-2, implementation of this alternative would meet most of the basic objectives of the project.

Table 5.4-2. Attainment of Project Objectives – Alternative 2: Reduced Project

Project Objective	Does Reduced Project Alternative Meet Project Objectives?
Provide an industrial and office development project consistent with the site’s land use that maximizes the development potential of the site	No. The Reduced Project Alternative would not maximize the development potential of the site.
Provide an industrial and office development project that is compatible and complementary with the existing surrounding and adjacent land uses and facilities	Yes. The Reduced Project Alternative would provide an industrial and office development project that is compatible and complementary with the existing surrounding and adjacent land uses and facilities.
Provide a modern, urban development site in place of vacant site, which was previously a natural gas processing and compression plant	Yes. The Reduced Project Alternative would provide a modern, urban development in place of a vacant site.
Provide an economically-viable development program for the property	Partially. The Reduced Project Alternative would provide an economically-viable development program for the site but to a lesser extent than the project because of the reduced scope.
Increase the City of Long Beach’s professional industrial and office inventory, which would accommodate additional employment within the city	Partially. The Reduced Project Alternative would increase the city’s professional industrial and office inventory and accommodate additional jobs but to a lesser extent than the project because of the reduced scope.

Table 5.4-2. Attainment of Project Objectives – Alternative 2: Reduced Project

Project Objective	Does Reduced Project Alternative Meet Project Objectives?
Maintain consistency with the City of Long Beach General Plan and zoning ordinances	Yes. The Reduced Project Alternative would be consistent with the City of Long Beach General Plan and zoning ordinances.
Provide needed infrastructure improvements including roadway, sidewalk, and park improvements, which would correct existing public infrastructure deficiencies	Yes. The Reduced Project Alternative would include infrastructure improvements including roadway, sidewalk, and park improvements to correct existing public infrastructure deficiencies.

5.4.3 Alternative 3: Mixed-Use Development

The Mixed-Use Development Alternative proposes a mixed-use building that is approximately 61 feet (up to maximum 65 feet) above ground level (maximum 5 stories). The building includes a 200-unit, 5-story apartment building, with 56,000 SF of retail shopping center space on the street level. The building also includes a 4-story parking structure on a 7.8-acre site. The entrance for the parking structure would be on the north side of the property from Spring Street and on the east side of the property from Orange Avenue. Off-site street improvements and off-site park improvements would be the same as described for the proposed project. This alternative would conflict with the City of Long Beach General Plan and zoning ordinance.

Air Quality

As with the proposed project, implementation of this alternative would result in an increase in air emissions. Construction of the Mixed-Use Development Alternative would require the same construction phases, similar construction equipment, and for a similar length of time. Similar to the proposed project, the Mixed-Use Development Alternative would not result in an exceedance of SCAQMD thresholds for short-term construction related emissions or long-term operation of the project. The potential for fugitive dust remains significant, and implementation of **Mitigation Measure AQ-1** would be required to reduce potential impacts to less than significant.

Similar to the proposed project, the Mixed-Use Development Alternative would have potential long-term operational air quality impacts from mobile source emissions associated with project-related vehicular trips and stationary source emissions from on-site energy consumption; however, while the emissions rates for on-site operational activities would be greater than the proposed project, the emissions rates would not exceed the LSTs, and therefore, impacts would be less than significant for operation.

Geology and Soils

Implementation of this alternative would result in similar impacts related to geology and soils as the proposed project, as the project site would be graded to accommodate development, and new buildings (the mixed-use building and associated parking structure) would be located on the project site. Similar to the proposed project, the project site would be within 600 feet of an EFZ, and the project site contains liquefiable and expansive soils. Potential significant impacts from building structures on liquefiable and expansive soil and in close proximity to an EFZ would remain significant, and

implementation of **Mitigation Measure GEO-1** would be required to reduce potential impacts to less than significant.

Greenhouse Gas Emissions

No significant impact related to this environmental issue has been identified for the proposed project. GHG emissions would be generated during construction of this alternative. Additionally, operation of this alternative would generate GHG emissions through motor vehicle trips to and from the project site; energy use (natural gas and generation of electricity consumed by the proposed project); solid waste disposal; and generation of electricity associated with water supply, treatment, and distribution and wastewater treatment. For residential, commercial, and mixed-use projects, SCAQMD's threshold is 3,000 MT of CO_{2e} per year and is lower than for industrial projects, like the proposed project, which is 10,000 MT of CO_{2e} per year.

The total daily trips for the Mixed-Use Development Alternative would be 3,202, compared to 757 daily trips for the proposed project. The total annual GHG emissions would be more than 3,000 MT of CO_{2e} and therefore, would exceed SCAQMD's screening threshold and result in a significant impact that would require mitigation.

Noise

Implementation of this alternative would result in a similar impact on noise associated with the proposed project. At its closest point, the construction activity would be located within 150 feet of the existing church to the east, across Orange Avenue. The maximum and average noise levels would be the similar to the proposed project, which would result in a significant impact. Compliance with **Mitigation Measure NOI-1** would require limited work hours, which would result in a less than significant impact.

Traffic noise associated with project construction is not anticipated to be a significant source of noise. Traffic noise is not greatly influenced by lower levels of traffic, such as those associated with the project's construction effort. For example, traffic levels would have to double for traffic noise on adjacent roadways to increase by 3 dBA. The project's construction traffic on adjacent roadways would increase hourly traffic volumes by much less than a factor of 2; therefore, the increase in construction related traffic noise would be less than 3 dBA and is not significant.

Project related long-term vehicular trip increases are anticipated to be minimal when distributed to adjacent street segments. No significant off-site traffic noise impacts would occur under existing year conditions. No mitigation measures would be required for off-site land uses. On-site stationary noise would include building heating, ventilation, and air conditioning systems and parking lot usage, including door closing/slamming, horn honking, and car alarms. The proposed project's stationary source noise impacts would be lower than the City of Long Beach's District 1 daytime threshold of 70 dBA L_{max}, due to the distance from sensitive receptors.

Similar to the proposed project, implementation of the Mixed-Use Development Alternative would result in less than significant impacts from construction vibration. The church east of the project site would be located approximately 200 feet from the building footprint where pile driving may occur. Following FTA vibration guidance, at 200 feet, the pile driver vibration level would be 77 VdB. This level would not exceed FTA's daytime annoyance threshold of 78 VdB. Therefore, the impacts from construction vibration would be less than significant.

Transportation

Similar to the proposed project, during construction, construction-related traffic, such as deliveries of equipment and materials and construction worker traffic, would be generated. However, construction traffic would be temporary and would not substantially interfere with the existing traffic load and capacity of the street system.

Implementation of the Mixed-Use Development Alternative would result in approximately 3,202 passenger total vehicle trips per day (Appendix F). This would be 2,445 daily trips greater than the 757 total daily trips for passenger vehicles and trucks for the proposed project. **Mitigation Measures TRAN-1** through **TRAN-5** would be implemented to reduce significant impacts. However, this alternative would have a greater significant impact at the intersection of Orange Avenue and Spring Street and would result in a significant and unavoidable impact at this intersection with mitigation implemented. Additionally, impacts at Orange Avenue and 32nd Street and Orange Avenue and I-405 Southbound Ramps would result in a significant and unavoidable impact because **Mitigation Measures TRAN-1, TRAN-4, and TRAN-5** are subject to approval by and are the responsibility of another agency (City of Signal Hill and Caltrans, respectively). The responsible agencies do not have any plans to improve the impacted intersections, or if they do have plans, those plans are either not funded or on a construction schedule that would not allow for those improvements to be operational by the project's opening year. As such, impacts would be significant and unavoidable

Conclusion

Under the Mixed-Use Development Alternative, impacts would be greater compared to the proposed project. While impacts on geology and soils and noise would be similar to the proposed projects, a new significant impact, resulting from GHG emissions, would occur, and impacts from air quality would be greater. Additionally, impacts on transportation would result in a significant and unavoidable impact similar to the proposed project; however, impacts would be greater than the proposed project. As shown in Table 5.4-3, this alternative would meet some of the objectives of the proposed project but would conflict with the City of Long Beach General Plan and zoning ordinance.

Table 5.4-3. Attainment of Project Objectives – Alternative 3: Mixed-Use Development

Project Objective	Does Mixed-Use Development Alternative Meet Project Objectives?
Provide an industrial and office development project consistent with the site's land use that maximizes the development potential of the site	No. The Mixed-Use Development Alternative would not provide an industrial and office development project consistent with the site's land use.
Provide an industrial and office development project that is compatible and complementary with the existing surrounding and adjacent land uses and facilities	No. The Mixed-Use Development Alternative would not provide an industrial and office development project that is compatible and complementary with the existing surrounding and adjacent land uses and facilities. The project site is currently surrounded by light industrial, and a mixed-use development would not be as compatible and complementary to the existing surrounding and adjacent land uses and facilities.
Provide a modern, urban development site in place of vacant site, which was previously a natural gas processing and compression plant	Yes. The Mixed-Use Development Alternative would provide a modern, urban development site in place of the current vacant site.
Provide an economically-viable development program for the property	Yes. The Mixed-Use Development Alternative would provide an economically-viable development program for the property.
Increase the City of Long Beach's professional industrial and office inventory, which would accommodate additional employment within the city	No. The Mixed-Use Development Alternative would not provide an increase in the city's professional industrial and office inventory; however, additional employment may be created in the retail space.
Maintain consistency with the City of Long Beach General Plan and zoning ordinances	No. The Mixed-Use Development Alternative would not be consistent with the City of Long Beach General Plan and zoning ordinances.
Provide needed infrastructure improvements including roadway, sidewalk, and park improvements, which would correct existing public infrastructure deficiencies	Yes. The Mixed-Use Development Alternative would provide infrastructure improvements including roadway, sidewalk, and park improvements which would correct existing public infrastructure deficiencies.

5.5 Environmentally-Superior Alternative

As shown in Table 5.5-1, the No Project/No Development Alternative is considered the environmentally superior alternative to the proposed project, as it would avoid the following impacts identified for the proposed project: air quality, geology and soils, noise, and transportation. However, CEQA Guidelines Section 15126.6(e)(2) states that “if the environmentally-superior alternative is the No Project Alternative, the EIR shall also identify an environmentally-superior alternative among the other alternatives.” As shown in Table 5.5-1, the Reduced Project Alternative would be the environmentally superior alternative, because this alternative would reduce the potential significant impacts associated with transportation and result in lower GHG emissions; however, this alternative would not meet all of the project objectives.

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Table 5.5-1. Comparison of Alternative Impacts on Proposed Project

Environmental Issue Area	Proposed Project	No Project/No Development Alternative	Alternative 2: Reduced Project	Alternative 3: Mixed-Use Development
Air Quality	Less than Significant with Mitigation	Avoid The existing baseline air emissions would remain the same, as no new development would occur	Similar Emissions would be less compared to the proposed project; however, the potential for fugitive dust still remains.	Greater Emissions for construction activities would be similar compared to the proposed project; however, the potential for fugitive dust still remains. Emissions of all criteria pollutants for operation would be higher compared to the proposed project.
Geology and Soils	Less than Significant with Mitigation	Avoid Because no additional grading or development would occur, this alternative would avoid the potential geology/soils impact.	Similar Because grading and development would occur, this alternative would result in a potential impact similar to the proposed project.	Similar Because grading and development would occur, this alternative would result in a potential impact similar to the proposed project.
GHG Emissions	Less than Significant	Avoid The existing baseline GHG emissions would remain the same, as no new development would occur.	Reduce This alternative would emit less MT of CO ₂ e compared to the proposed project.	Greater This alternative would emit more MT of CO ₂ e compared to the proposed project and would be subject to a lower emissions threshold; therefore, it would result in a significant impact.
Noise	Less than Significant with Mitigation	Avoid This alternative would not change the existing conditions of the site, so there would be no potential to impact existing adjacent sensitive receptors.	Similar This alternative would result in similar construction noise and vibration impacts, due to the distance from sensitive receptors.	Similar This alternative would result in similar construction noise and vibration impacts, due to the distance from sensitive receptors.

Table 5.5-1. Comparison of Alternative Impacts on Proposed Project

Environmental Issue Area	Proposed Project	No Project/No Development Alternative	Alternative 2: Reduced Project	Alternative 3: Mixed-Use Development
Transportation	Significant and Unavoidable	<p>Avoid</p> <p>This alternative would not change the existing conditions of the site; therefore there would be no increase in trip generation at the project site.</p>	<p>Reduced</p> <p>This alternative would generate 417 total daily trips, approximately 340 less daily trips than the proposed project and result in a reduced impact; however, the significant unavoidable impact to the intersections of Orange Avenue/Spring Street, Orange Avenue/32nd Street, and Orange Avenue/I-405 Southbound Ramps would remain.</p>	<p>Greater</p> <p>This alternative would generate 3,202 total daily trips, approximately 2,445 more daily trips than the proposed project, would not reduce or avoid the significant unavoidable impact to the intersections of Orange Avenue/Spring Street, Orange Avenue/32nd Street, or Orange Avenue/I-405 Southbound Ramps. It would likely result in significant LOS impacts to other roadway facilities.</p>

Notes:

Avoid=Impacts under this alternative avoided as compared to impacts for the proposed project; Reduced=Impacts under this alternative reduced as compared to impacts for the proposed project; Similar=Impacts under this alternative are similar to impacts for the proposed project; Greater=Impacts under this alternative greater to impacts for the proposed project

CO₂e=carbon dioxide equivalent; GHG=greenhouse gas; I-405=Interstate 405; LOS=level of service; MT=metric tons