

## CHAPTER 6 Alternatives to the Proposed Project

Section 15126.6(a) of the CEQA Guidelines requires an EIR to describe a range of reasonable alternatives to the proposed project, or to the location of the proposed project, that could feasibly attain the basic objectives of the project as proposed, while reducing significant impacts identified. An EIR is not required to consider every conceivable alternative to a project; rather, it must consider a range of potentially feasible alternatives that will foster informed decision-making and public participation. In addition, an EIR should evaluate the comparative merits of alternatives. Therefore, this chapter sets forth potential alternatives to the proposed project and evaluates them, as required by CEQA.

Key provisions of the CEQA Guidelines relating to the Alternatives analysis (Section 15126.6 et seq.) are summarized below:

- The discussion of alternatives shall focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects identified, even if these Alternatives would impede to some degree the attainment of the project objectives, or would be costlier.
- The “No Project” Alternative shall be evaluated along with its impact. The “no project” analysis shall discuss the existing conditions, as well as what would be reasonably expected to occur in the foreseeable future if the project is not approved.
- The range of alternatives required in an EIR is governed by a “rule of reason”; therefore, the EIR must evaluate only those alternatives necessary to permit a reasonable choice. The alternatives shall be limited to those that would avoid or substantially lessen any of the significant impacts identified for a project as proposed.
- With regard to alternative locations, only locations that would avoid or substantially lessen any of the significant impacts of the project as proposed need be considered for inclusion in the EIR.
- An EIR need not consider an alternative whose effects cannot be reasonably ascertained and whose implementation is remote and speculative.

### 6.1 CRITERIA FOR SELECTING POTENTIALLY FEASIBLE ALTERNATIVES

Alternatives may include such changes to a project as modification of the project as proposed, altogether different uses, or suitable alternative project sites. However, the range of alternatives discussed in an EIR is governed by a “rule of reason” which CEQA Guidelines Section 15126.6(f) defines as:

...set[ting] forth only those Alternative 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 project. Of those Alternatives, the EIR need examine in detail the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. The range of feasible Alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision-making.

Among the factors that may be taken into account when addressing the feasibility of Alternatives (as described in CEQA Guidelines Section 15126.6[f][1]) is the analysis of environmental impacts, site

suitability, economic viability, availability of infrastructure, General Plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the project proponent could reasonably acquire, control, or otherwise have access to an Alternative site.

As described in Section 3.2, Statement of Objectives, the following objectives have been established for the proposed project and will aid decision-makers in their review of the project, the project alternatives, and associated environmental impacts:

1. Coordinate community planning and zoning policies in light of historic development patterns.
2. Accommodate and focus regionally projected jobs, housing, and population growth through transformative transit-oriented and mixed-use development in corridors, centers, and gateways including Pacific Avenue Gateway, Pacific Edison Center, East Broadway Corridor, East Colorado Gateway, South Central Avenue Corridor, South Glendale (South of Palmer) Corridor, West Broadway Corridor, West Colorado Corridor, Verdugo Road, the Glendale Community College Garfield Campus area, Tropico Center, and area freeways and railroad rights-of-way.
3. Create and enhance vibrant, attractive, and walkable commercial, multi-family residential and mixed-use areas including Columbus School, South Glendale (North of Palmer), and Adams Square to meet the wide range of economic needs within the City.
4. Improve the function, design, and vitality of multi-family residential areas, including Moorpark, Vineyard, Diamond, Citrus Grove, City Center, Somerset, Pacific Edison, South Brand, Road's End, and Mariposa by enhancing the positive characteristics of existing land uses.
5. Maintain the character of existing single family and hillside residential neighborhoods including Moorpark, Vineyard, Diamond, Citrus Grove, City Center, Pacific Edison, Adams Hill, North Glendale Avenue, and Mariposa.
6. Enhance and maintain the Brand Boulevard of Cars as a regional automotive center.
7. Manage the expansion of Glendale Memorial Hospital and Health Center to the benefit of Glendale's residents, workers, and visitors.
8. Foster a well-planned and equitable transportation system to enhance mobility and goods movement through first-last mile connectivity and complementary land uses in High-Quality Transit Areas, and along proposed High-Speed Rail and East-West Connector corridors.
9. Promote community health and wellness through equitable access to health care; bicycle, pedestrian, and transit infrastructure; and a variety of high-quality local parks, trails, community centers, recreational opportunities, and regional open space.
10. Cultivate medical, commercial, industrial, and creative employment opportunities by taking advantage of Glendale's proximity and connections to regional destinations.
11. Adopt Downtown Specific Plan parking management policies in current or future transit-oriented and mixed-use areas where feasible to promote economic development, improve multimodal mobility, and encourage sustainable land use planning.
12. Provide a balanced mix of housing opportunities and services available and affordable to all current and future residents, including those with special needs, by meeting or exceeding the city Regional Housing Needs Assessment allocation.
13. Identify and protect cultural, historical, archaeological and paleontological resources that are important to the community.

14. Amend the Glendale General Plan to ensure consistency with the South Glendale Community Plan, including policies in the Circulation Element regarding Level of Service, use of Vehicle Miles Traveled as a means of impact analysis, and consistency with the Bicycle Transportation Plan; and policies in the Land Use Element regarding land use designations.

## **6.2 ALTERNATIVE SITE REJECTED AS INFEASIBLE**

As the proposed SGCP is designed to guide the development in South Glendale, an alternative site location would not be an appropriate alternative to the proposed project.

## **6.3 ALTERNATIVES SELECTED FOR FURTHER ANALYSIS**

As described throughout Chapter 4, analysis of the proposed project has determined the following impacts to be significant and unavoidable after implementation of all feasible mitigation measures:

- Aesthetics: Visual Character or Quality; New Sources of Shade
- Air Quality: Air Quality Plans; Air Quality Violations; Non-attainment of Criteria Pollutants; Sensitive Receptors
- Greenhouse Gas Emissions: Generation and Applicable Plans
- Population and Housing: Population Growth
- Public Services: Fire Protection Services; Police Protection Services
- Recreation: Construction on New Recreational Facilities; Deterioration of Parks/Recreational Facilities
- Transportation and Traffic: Traffic and Level of Service Standards

Based on the criteria listed above (Section 6.1), the following three alternatives have been determined to represent a reasonable range of alternatives that have the potential to feasibly attain most of the basic objectives of the proposed project, but that may avoid or substantially lessen any of the significant effects of the proposed project. These alternatives are analyzed in detail in the following sections:

- Alternative 1: No Project Alternative
- Alternative 2: Downtown/Tropico Center Plan Alternative
- Alternative 3: East Broadway/South Central Avenue Development Alternative

The following section describes the alternatives, comparatively analyzes the potential environmental effects of the alternatives, and evaluates the extent that the alternatives meet the proposed project objectives. The focus of the analysis is the difference between the environmental effects of the alternatives compared to those of the proposed project, with an emphasis on how the alternatives affect the identified significant impacts of the proposed project, and the identification of any new effects created by the alternatives. For each issue area, the analysis indicates which mitigation measures would be required for the alternatives and which significant and unavoidable impacts would be avoided or substantially reduced. Where appropriate, the analysis indicates whether any mitigation measures would no longer be required, or whether additional mitigation measures would be required for the alternatives.

An EIR must identify an “environmentally superior” alternative, and where the no project alternative is identified as environmentally superior, the EIR is then required to identify an environmentally superior alternative from among the others evaluated. Each alternative's environmental impacts are compared to

the proposed project and determined to be environmentally superior, neutral or inferior. However, only those impacts found significant and unavoidable are used in making the final determination of whether an alternative is environmentally superior or inferior to the proposed project.

## **6.4 ANALYSIS OF PROJECT ALTERNATIVES**

### **6.4.1 Alternative 1: No Project**

#### **■ Description**

Section 15126.6(e)(3)(A) of the CEQA Guidelines states that when the project is the revision of an existing land use plan, policy or ongoing operation, the No Project Alternative is the continuation of the existing plan, policy or operation into the future. Continuation of the Glendale General Plan would result in 2,587 dwelling units beyond existing conditions by 2040; however, land uses and zoning designations would remain the same as they exist today throughout the proposed SGCP area and within the existing DSP boundaries. Thus, this alternative, which is required by CEQA, assumes that the existing General Plan and implementing zoning would remain unchanged. The existing General Plan would remain in effect, and no update to the existing General Plan goals and policies would occur.

#### **■ Environmental Analysis**

##### ***Aesthetics***

There are no eligible or designated scenic highways within the proposed SGCP area. Similar to the proposed project, the No Project Alternative would have no impact on scenic resources within a scenic highway. The No Project Alternative would result in less than significant impacts to scenic vistas and day or nighttime views, given the highly urbanized project area's existing commercial, industrial, and residential development. The No Project Alternative could result in changes to visual character of the SGCP area similar to the proposed project due to the future development (as allowed under the existing General Plan) coming on-line throughout the community. Future development of new multi-story buildings in the SGCP area may also create new sources of shade that could impact shadow-sensitive uses in the vicinities of the new development sites. However, these impacts would be reduced compared to the proposed project due to as much as 75 percent less allowable new development under the No Project Alternative relative to the proposed project.

##### ***Agriculture/Forestry Resources***

The proposed SGCP area does not include Prime Farmland, Unique Farmland, Farmland of Statewide Importance, zoning for agricultural use, or forest land. Similar to the proposed project, the No Project Alternative would have no impact on agriculture or forestry resources.

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

The proposed project was determined to result in significant and unavoidable impacts related to a conflict with or obstruction of the applicable air quality plan. The most relevant and applicable air quality plans for the proposed SGCP area is SCAQMD's 2016 AQMP and SCAG's 2016 RTP/SCS. Regional air quality emissions projections used in the SIP and the AQMP are based on the growth projections included in the RTP/SCS; therefore, projects that are consistent with these growth projections would also be consistent with regional air quality emission projections and attainment status regarding CAAQS

and NAAQS. Implementation of No Project Alternative would allow for continued development within the SGCP area, consistent with the existing General Plan and the growth currently accounted for in the regional planning documents, including the SCAG 2008 Regional Comprehensive Plan, SCAG 2016-2040 RTP/SCS, and SCAG Compass Growth Visioning Plan. Therefore, the No Project Alternative would conflict with the applicable air quality plans, and would result in no impact.

The No Project Alternative would result in less than significant impacts associated with air quality, as growth under the existing Glendale General Plan within South Glendale is accounted for in the relevant air quality plans.

Similar to the proposed project, the No Project Alternative would result in significant and unavoidable impacts associated with a contribution to an existing air quality violation or net increase of any criteria pollutant for which the air basin is in nonattainment. The SCAB is currently in nonattainment for ozone, PM<sub>10</sub>, and PM<sub>2.5</sub>. The proposed project was determined to result in significant and unavoidable impacts associated with the exposure of sensitive receptors to substantial pollutant concentrations. While the No Project Alternative would result in air quality impacts, given existing sensitive receptors near substantial pollutant concentrations, less impacts on air quality are anticipated under the No Project Alternative, given that as many as 75 percent fewer dwelling units would be permitted under the No Project Alternative compared to the proposed project. The No Project Alternative would be required to comply with SCAQMD's Rule 402 (Nuisance) which restricts the discharge of any odorous emission. Similar to the proposed project, the No Project Alternative would result in a less than significant impact associated with objectionable odors, though by as much as 75 percent less than the proposed project.

### **Biological Resources**

The proposed SGCP area does not include riparian habitat or other sensitive natural communities, wildlife corridors or nursery sites, or adopted HCP or NCCP. Similar to the proposed project, the No Project Alternative would have no impact on riparian habitat or other sensitive natural communities, wildlife corridors or nursery sites, or adopted HCP or NCCP. The proposed project was determined to result in less than significant impacts associated with federally protected wetlands and the protection of a biological resource. The No Project Alternative would result in a less than significant impact associated with federally protected wetlands and the protection of a biological resource [Glendale Municipal Code, Chapter 12.44, protection of indigenous trees], and the impact would be reduced compared to the proposed project due to as much as 75 percent fewer dwelling units permitted under the No Project Alternative.

Under No Project Alternative, the loss of a special status species, an occupied nest or substantial interference with roosting and foraging for migratory species of special concern or raptors, as a result of future construction or demolition activities, would result in a potentially significant impact, similar to the proposed project. The No Project Alternative would have a reduced impact associated with special-status species due to reduced land use intensity by 75 percent less than the proposed project. However, like the proposed project, the No Project Alternative would require compliance with the Open Space and Conservation Element Policies 1 (Natural resources, including open spaces, biological habitats and native plant communities should be maintained and, where necessary, restored) and 5 (Proper management of environmental resources, especially natural resources, can assist in reducing hazards to the life and property of the City's residents and should be considered in project planning), and Goals 2 (Protect vital or sensitive open space areas including ridgelines, canyons, streams, geologic formations, watersheds and historic, cultural, aesthetic and ecologically significant areas from the negative impacts of development and urbanization), 4 (Develop a program that sustains the quality of Glendale's natural communities),

and 7 (Continue programs which enhance community design and protect environmental resource quality). Compliance with these policies and goals would reduce any impacts associated with special-status species under the No Project Alternative to a level below significant.

### **Cultural Resources**

The proposed project was determined to result in potentially significant impacts associated with historical resources. South Glendale contains 28 properties listed in the NRHP or local register and numerous properties that are potentially eligible for listing throughout the Downtown Specific Area, especially along East Colorado Street, South Central Avenue, South Glendale Avenue, and the Tropico District. These are identified in the South Glendale Historic Resource Survey, Appendix G in this EIR. Any disturbance to these properties would be considered a significant impact; similar to the proposed project, the No Project Alternative would result in potentially significant impact to historical resources. Similar to the proposed project, the No Project Alternative would result in potentially significant impacts due to potential disturbance of undiscovered archaeological resources. Any discovery of a paleontological resource is considered potentially significant, and the No Project Alternative, similar to the proposed project, would result in potentially significant impacts due to the discovery of a paleontological resource. Although the proposed SGCP is nearly fully built-out and the discovery of human remains is not likely; the impact is considered potentially significant in the unlikely event that human remains are discovered. The No Project Alternative would result in similar potentially significant impacts associated with the discovery of human remains as the proposed project, should they be discovered. The proposed project was determined to result in potentially significant impacts associated with tribal cultural resources, and the No Project Alternative would result in similar potentially significant impacts due to the possibility of uncovering unknown tribal cultural resources.

In summary, under the No Project Alternative, the impacts to cultural resources would be similar but reduced compared to the proposed project given the 75 percent fewer new dwelling units permitted under the No Project Alternative.

### **Geology/Soils**

The proposed SGCP area does not include any areas that would require an individual septic system; therefore, the No Project Alternative would not result in impacts associated with soil capable of supporting the use of a septic tank. The proposed project was determined to result in less than significant impacts associated with rupture of a known fault, strong seismic groundshaking, liquefaction, and landslides; substantial soil erosion or the loss of top soil; on or off-site lateral spreading, subsidence or collapse; and expansive soils. Similar to the proposed project, development associated with the No Project Alternative would require compliance with the NPDES, CBC, UBC, and the County Grading Ordinance, which would reduce impacts associated with rupture of a known fault, strong seismic groundshaking, liquefaction, and landslides; substantial soil erosion or the loss of top soil; on or off-site lateral spreading, subsidence or collapse; and expansive soils, which would reduce impacts on geological resources and soils to a less than significant level. The No Project Alternative would result in less than significant impacts associated with rupture of a known fault, strong seismic groundshaking, liquefaction, and landslides, erosion or loss of top soil, on or off-site lateral spreading, subsidence, or collapse, or expansive soils similar to the proposed project; however, impacts associated with the No Project Alternative would be reduced due to the reduced land use intensity throughout the proposed SGCP area.

In summary, under the No Project Alternative, the impacts to geological resources and soils would be similar but reduced compared to the proposed project given the 75 percent fewer new dwelling units permitted under the No Project Alternative.

## **Greenhouse Gas Emissions**

GHG emissions associated with future development would be generated during project construction and as a result of operations within the proposed SGCP area during and after buildout. While the proposed project was found to be generally consistent with relevant local goals, policies, and objectives in the Glendale General Plan (see Section 4.6.3 in this EIR), it is inconsistent with Air Quality Element Goal 1, Objectives 1.a (Reduce Glendale's contribution to regional emissions in a manner both efficient and equitable to residents and businesses, since emissions generated within Glendale affect regional air quality) and 1.c (Comply with the AQMP prepared by the SCAQMD and SCAG). Additionally, as of the 2014 first updated Scoping Plan, CARB recommends GHG emissions at the local plan-level not exceed 6 metric tons CO<sub>2e</sub> per capita per year by 2030 and no more than 2 metric tons CO<sub>2e</sub> per capita by 2050. The proposed project would exceed these per capita and mass emissions goals; therefore, the proposed project would not be consistent with statewide emissions limits established by AB 32, SB 32, SB 391, and Executive Orders S-3-05 and B-30-15. Therefore, the proposed project was determined to result in significant and unavoidable impacts associated with GHG emissions.

The growth associated with the No Project Alternative would result in a reduced level of GHG emissions compared to the proposed project, given the 75 percent fewer new dwelling units permitted under the No Project Alternative; however, the impact would ultimately be significant and unavoidable due to the existing ozone nonattainment within SCAB.

## **Hazards/Hazardous Materials**

There are no airports or airstrips within or near the proposed SGCP area. Similar to the proposed project, the No Project Alternative would not result in impacts associated with a public airport or private airstrip. The proposed project was determined to result in less than significant impacts associated with the routine transport, use or disposal of hazardous materials; accidental release of hazardous materials into the environment; emitting hazardous emissions within 0.25 mile of an existing or proposed school; locating development on a site that is included on a list of hazardous materials sites pursuant to Government Code 65962.5; interfering with an adopted emergency response plan or emergency evacuation plan; or would increase the risk of loss, injury or death involving wildland fires.. Similar to the proposed project, future development under the No Project Alternative would result in impacts associated with the routine transport, use or disposal of hazardous materials; accidental release of hazardous materials into the environment; emitting hazardous emissions within 0.25 mile of an existing or proposed school; locating development on a site that is included on a list of hazardous materials sites pursuant to Government Code 65962.5; interfering with an adopted emergency response plan or emergency evacuation plan; or would increase the risk of loss, injury or death involving wildland fires. The No Project Alternative would be required to comply with the same regulations as the proposed project as they relate to hazardous materials (i.e., RCRA, California Hazardous Waste Control Law, and CAPP). Compliance with these regulations would reduce any potentially significant impacts associated with hazardous materials to a level below significant; however, the No Project Alternative would result in a reduced impact compared to the proposed project given the 75 percent fewer new dwelling units permitted under the No Project Alternative.

## **Hydrology/Water Quality**

There is no 100-year flood hazard area within the proposed SGCP area, and the area is not at risk of inundation by seiche or tsunamis. Similar to the proposed project, the No Project Alternative would not result in impacts associated with 100-year flood hazard areas. The proposed project was determined to result in less than significant impacts associated with water quality standards or waste discharge

requirements; groundwater supplies; erosion or siltation; flooding; exceedance of stormwater drainage system capacity; water quality; failure of a dam or levee; and inundation by mudflow. Similar to the proposed project, future development under the No Project Alternative would result in impacts associated with water quality standards or waste discharge requirements; groundwater supplies; erosion or siltation; flooding; exceedance of stormwater drainage system capacity; water quality; failure of a dam or levee; and inundation by mudflow. The No Project Alternative would be required to comply with the NPDES municipal permit, Storm Water and Urban Runoff Pollution Prevention Control, and SUSMP. Compliance with these regulations would reduce impacts associated with water quality, erosion or siltation, stormwater runoff, and flooding to a level below significant. Additionally, similar to the proposed project, the No Project Alternative would result in less than significant impacts associated with groundwater supply, failure of a dam or levee, and inundation by mudflow. These impacts, although less than significant, would be reduced compared to the proposed project given the 75 percent fewer new dwelling units permitted under the No Project Alternative.

### **Land Use/Planning**

Similar to the proposed project, the No Project Alternative would not result in an impact associated with dividing an established community, or an adopted HCP or NCCP, as no divisions of an established community or an adopted HCP or NCCP is proposed in lieu of the proposed project or would otherwise be halted by adoption of the proposed project. Implementation of No Project Alternative would allow for continued development within the SGCP area, consistent with the existing General Plan and the growth currently accounted for in the regional planning documents, including the SCAG 2008 Regional Comprehensive Plan, SCAG 2016-2040 RTP/SCS, and SCAG Compass Growth Visioning Plan. Therefore, the No Project Alternative would not interfere with any existing land use plans for the planning area, and would result in no impact. The types, intensities and location of land uses would remain as approved under the existing General Plan. However, under the No Project Alternative, there would be no amendments to the Land Use Element text and Land Use Map, Circulation Element, and Housing Element of the Glendale General Plan or Glendale Municipal Code Title 30 to modify the Zoning Ordinance and Zoning Map, to encourage positive community change and foster sustainable land use, while balancing the character of the community with citywide policies and regional initiatives, including multi-modal connectivity through new active transportation improvements and TOD; thus, not meeting the City's proposed project objectives (refer to Section 6.1 above).

### **Mineral Resources**

The proposed project was determined to result in less than significant impacts associated with known mineral resources and mineral resource recovery sites. The proposed SGCP area is highly urbanized and existing land uses preclude the availability of any known mineral resources or mineral resource extraction site. Similar to the proposed, project, the No Project Alternative would result in less than significant impacts to mineral resources; however, these impacts would be reduced compared to the proposed project given the 75 percent fewer new dwelling units permitted under the No Project Alternative.

### **Noise**

Similar to the proposed project, the No Project Alternative would not result in an impact associated with public or private airports and airstrips. The proposed project was determined to result in less than significant impacts associated with a permanent increase in ambient noise levels. The No Project Alternative would result in a reduced impact associated with a permanent increase in ambient noise levels; however, the impact would remain less than significant. The proposed project was determined to result in potentially significant impacts associated with the generation of noise levels in excess of



standards in the Glendale General Plan Noise Element. The dominant noise source affecting land use compatibility within the proposed SGCP area consists of vehicular traffic on adjacent roadways. Future noise levels within the proposed SGCP area, for residential land uses would be clearly unacceptable (i.e., greater than 75 dBA CNEL) at areas located within approximately 358 to 380 feet from the SR-134 edge of pavement and 264 feet from the SR-2 edge of pavement, and normally unacceptable (i.e., greater than 70 dBA CNEL) at areas located within approximately 613 to 637 feet from the SR-134 edge of pavement and 594 feet from the SR-2 edge of pavement. Although these areas are already developed, changes to the land use in these areas would result from implementation of the proposed SGCP, including the introduction of new sensitive land uses. Development of new noise-sensitive land uses as a result of future projects within the proposed SGCP area may subject receptors in vicinities not shielded by existing highway noise barriers to noise levels that exceed General Plan guidelines. Noise policies, as contained in the General Plan Noise Element, the proposed SGCP, and regulations in the Glendale Municipal Code are in place to control and reduce noise levels from various land uses to levels below impact thresholds for certain new developments. Plans and policies include the requirement for noise studies for new developments, limits on hours of operation for various noise-generating activities, and standards for the compatibility of land use types. Additionally, enforcement of the federal, State, and local noise regulations would control impacts. With the implementation of these policies and enforcement of the Noise Control chapter of the Glendale Municipal Code, impacts associated with compliance of the Glendale Municipal Code would be less than significant. Implementation of the proposed SGCP would expose receptors or result in the generation of noise levels in excess of standards established in the General Plan Noise Element; therefore, this is considered a potentially significant impact.

The No Project Alternative would result in potentially significant impacts associated with the generation of noise levels from future development located within approximately 358 to 380 feet from the SR-134 edge of pavement and 264 feet from the SR-2 edge of pavement, and normally unacceptable (i.e., greater than 70 dBA CNEL) at areas located within approximately 613 to 637 feet from the SR-134 edge of pavement and 594 feet from the SR-2 edge of pavement. of 7,750 fewer dwelling units and 1,296 thousand fewer square feet of nonresidential land uses compared to the proposed project. However, these impacts would be reduced compared to the proposed project given the 75 percent fewer new dwelling units permitted under the No Project Alternative.

Depending on the construction activity and equipment being used as part of future development under the No Project Alternative, construction activities can generate groundborne vibration. Pile driving would potentially generate the highest groundborne vibration levels and is the primary concern in regard to human perception. Similar to the proposed project, the No Project Alternative would have the potential to result in potentially significant impacts related to excessive groundborne vibration associated with construction; however, the impact would be reduced compared to the proposed project given the 75 percent fewer new dwelling units permitted under the No Project Alternative. Any future construction projects within the proposed SGCP area and in proximity to a noise sensitive area would be required to conduct specific environmental review to ensure that the project is in compliance with the Glendale Municipal Code, particularly Section 8.36.080 for construction noise, and any required noise mitigation elements. Similar to the proposed project, future development under the No Project Alternative would result in potentially significant impacts associated with temporary increase in ambient noise levels. However, these impacts would be reduced compared to the proposed project given the 75 percent fewer new dwelling units permitted under the No Project Alternative.

## **Population/Housing**

The proposed project was determined to result in less than significant impacts associated with the displacement of housing and people, and significant and unavoidable impacts associated with inducement of population growth. As with the proposed project, buildout of the No Project Alternative would result in a net increase in dwelling units and population, and therefore, would result in less than significant impacts associated with displacement of housing and people. However, these impacts would be reduced compared to the proposed project given the 75 percent fewer new dwelling units permitted under the No Project Alternative.

As described above under Land Use, the growth associated with the No Project Alternative is accounted for in current regional planning documents (SCAG 2008 Regional Comprehensive Plan, SCAG 2016-2040 RTP/SCS, and SCAG Compass Growth Visioning Plan); therefore, the No Project Alternative would result in less than significant impacts associated with population growth. However, the No Project Alternative would not accommodate and focus regionally projected jobs, housing, and population growth through transformative transit-oriented and mixed-use development in corridors, centers, and gateways which would preclude economic development, such as reduced parking requirements and increased housing density to promote mixed-use development around key resources including Larry Zarian Transportation Center and the Glendale Memorial Hospital and Health Center. As such, while impacts of the No Project Alternative to population and housing would be less than significant, this alternative would not allow for the benefits anticipated under the proposed project.

## **Public Services**

The proposed project was determined to result in significant and unavoidable impacts associated with fire protection and police protection, and less than significant impacts to school and library services. Implementation of the No Project Alternative would result in a population increase of 6,985, and the total population in the SGCP area would increase from 102,338 to 109,323. Similar to the proposed project, the increase in population would create a need for fire protection services, police protection, schools and libraries.

The No Project Alternative would contribute to the population growth and increasing demands for school services within the proposed SGCP area. To maintain acceptable service ratios, the construction of new or expanded school facilities may be required. In accordance with SB 50, at the time of building permit issuance, development projects are required to pay established school impact fees. Funding collected under SB 50 would reduce impacts to GUSD facilities, which serve the proposed SGCP area to a less than significant level. Implementation of the No Project Alternative would also result in the potential for increased demand for library services within the proposed SGCP area, requiring the expansion and construction of new facilities. The addition of 6,985 residents (75 fewer residents when compared to the proposed project) would have adequate library services, as the citywide volume per resident ratio would be above the City standard similar to the proposed project. The impact of the proposed SGCP on library services would be less than significant. Under the No Project Alternative, as with development under the proposed project, any future development would be required to pay development fees that are collected by the City to support these public facilities that would help to reduce potential impacts; however, the impacts to schools and library services would be less under the No Project Alternative when compared to the proposed project given the 75 percent fewer residents anticipated under the No Project Alternative.

Similar to the proposed project, additional residents under the No Project Alternative would create additional demand on the GFD, specifically for the three stations located within the proposed SGCP

area: Fire Station 21, Fire Station 22, and Fire Station 25. Thus, the increase in population within the proposed SGCP area would have a potentially significant impact on fire protection services. The City does not have any programs in place, which allows the collection of development impact fees to mitigate impacts to fire protection services, including the provision of new or physically altered fire facilities.

Similar to the proposed project, development under the No Project Alternative would comply with all local, State, and federal regulations pertaining to fire protection. In addition, all discretionary projects are subject to environmental review and standard mitigation measures are applied as part of the conditions of approval for the project. The GFD's ability to maintain current workload/service levels would be reduced through a larger population requiring fire protection services. This is considered to be a significant and unavoidable impact. There is no feasible mitigation to reduce the impact; therefore, this impact is considered significant and unavoidable.

Likewise, the No Project Alternative would contribute to population growth, increasing demands for police protection services. An increased population as permitted by the No Project Alternative would exacerbate this deficiency; thus, the impact to police staffing levels is considered a significant and unavoidable impact. There is no feasible mitigation to reduce the impact; therefore, this impact is considered significant and unavoidable. However, the No Project Alternative would result in reduced impacts to fire protection and police protection services when compared to the proposed project given the 75 percent fewer residents anticipated under the No Project Alternative.

## **Recreation**

The proposed project was determined to result in significant and unavoidable impacts associated with physical deterioration and the expansion of recreational facilities. As discussed in Section 4.12 (Population and Housing), implementation of the proposed SCGP would potentially result in a population increase of 27,910 people, which would bring the total population within the proposed SGCP area to 130,248 people. Applying the minimum NRPA standards of 6 acres per 1,000 residents to the City would require a total of approximately 781 acres of developed parkland. Presently, there is approximately 285 acres of developed parkland within the City, indicating a deficit of 496 acres. Future development under the No Project Alternative would result in a population increase of 6,985 people, which would bring the total population within the proposed SGCP area to 109,323 people. Applying the minimum NRPA standards of 6 acres per 1,000 residents to the City would require a total of approximately 656 acres of developed parkland; indicating a deficit of 371 acres (a decrease of 125 acres when compared to the proposed project).

The City is planning for the development of a new recreation use along SR-134 that would comprise of 25 acres of recreational uses (i.e., Space 134). The 25-acre increase would bring the total parkland to 48.19 acres of parkland available to residents within the proposed SGCP area. The parkland ratio would increase to 0.47 acre of parkland per 1,000 persons, a 104 percent increase to the existing 0.23 acre per 1,000 persons.

Future development within the proposed SGCP area would be required to comply with the minimum NRPA and Quimby Act standards. Specifically, this requires that 6 acres of land for each 1,000 residents be devoted to local park and recreational purposes. This could be met through land dedication or payment of park fees, or a combination of both. While dedicated parkland directly increases the available recreation space within the City for residents, the payment of park fees from new development would be allocated to fund the acquisition and/or development of future parks or facility renovations associated with increased use of public facilities.

Adherence to existing applicable local regulations and implementation of the provisions in the Quimby Act would ensure that parks and open space are acquired, developed, improved, and expanded as future residential projects are constructed. Similar to the proposed SGCP, the No Project Alternative is not a physical project and does not directly create an impact; however, development resulting from future development anticipated under the No Project Alternative would be subject to development impact fees in order to mitigate any potential impacts associated with parklands. Any open space, facilities or parks proposed for establishment at a later date would require separate environmental review under CEQA and development impact fees; however, the No Project Alternative will remain deficient in parkland despite the increases in parkland acreages.

Therefore, similar to the proposed project, the No Project Alternative could result in potentially significant and unavoidable direct impacts from the construction or expansion of recreational facilities. However, the No Project Alternative would result in reduced impacts to recreational facilities when compared to the proposed project given the 75 percent fewer residents anticipated under the No Project Alternative.

### **Traffic/Transportation**

The proposed project was determined to not result in an impact associated with air traffic patterns; the No Project Alternative would not result in an impact associated with air traffic patterns.

The proposed project was determined to result in a less than significant impact associated with conflict with applicable plans, ordinances, and policies; hazards; and emergency access. The No Project Alternative would not conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, as the growth associated with the No Project Alternative is accounted for in the most recent adopted transportation plan (2016 RTP/SCS). Additionally, the No Project Alternative would result in similar less than significant impacts associated with hazards and emergency as the proposed project. The No Project Alternative does not propose the development of any roads, which may be hazardous, and the existing emergency access plans consider the growth and development associated with the No Project Alternative.

The Transportation Analysis prepared for the proposed SGCP (Fehr & Peers 2017), refer to Appendix F in this EIR, determined that the proposed project would result in significant and unavoidable impacts associated with LOS standards. Under existing conditions 7 intersections operate at LOS D or worse during the AM peak hour and 13 intersections operate at LOS D or worse during the PM peak hour. Under the No Project Alternative, this increases to 17 intersections in the morning and 24 intersections in the evening that operate at LOS D or worse conditions. The operating conditions for the proposed project are very similar to the No Project Alternative, with only one more intersection in the morning (18 intersections) and the same number of intersections in the evening (24 intersections) operating at LOS D or worse conditions. Similar to the proposed project, this impact would be significant and unavoidable.

Additionally, mainline freeway operating conditions analysis indicates four of the eight CMP freeway study locations are significantly impacted under the No Project Alternative; however, each of these locations already operates at LOS F under existing (2016) conditions as well as under the proposed project scenario. The No Project Alternative would therefore result in similar significant and unavoidable impacts as the proposed project.

## **Utilities/Service Systems**

The proposed project was determined to result in less than significant impacts associated with wastewater treatment requirements, wastewater treatment capacity, stormwater drainage facilities, water supplies, landfill capacity, solid waste regulations, and energy production or transmission facilities. The No Project Alternative, similar to the proposed project, would allow for increased land use intensity within the proposed SGCP area and would result in an increase in dwelling units and population. The increase in dwelling units and population within the proposed SGCP area would increase wastewater treatment demand, potentially increase the amount of runoff within the proposed SGCP area, increase demand for natural gas over existing conditions. All future projects under the No Project Alternative would require environmental review to identify any potential impacts and present feasible mitigation measures to reduce the identified impacts. Therefore, future development anticipated under the No Project Alternative would result in less than significant impacts associated with wastewater treatment requirements, wastewater treatment capacity, stormwater drainage facilities, water supplies, landfill capacity, solid waste regulations, and energy production or transmission facilities, but would be less when compared to the proposed project given the 75 percent fewer dwellings and residents anticipated under the No Project Alternative.

## ■ **Attainment of Project Objectives**

Under the No Project Alternative, development would continue as allowed under the existing General Plan and would result in an increase of 2,587 dwelling units and 6,985 residents when compared to an increase of 10,337 dwellings and 27,910 residents under the proposed project scenario.

The No Project Alternative would meet some of the objectives identified for the proposed project (refer to Section 6.1 above) in that it would allow for land uses consistent with the existing character of the City and continue to provide sufficient infrastructure to meet demand. However, the No Project Alternative would not fully meet any of the objectives that will act as a catalyst to move the City into the coming decades, while creating investment in employment opportunities, transit investment and increased mobility by which to enjoy a more environmentally friendly and sustainable community. Further, the proposed SGCP would provide a unified planning approach and specific design standards where future subsequent projects serve as independent pieces of the greater whole. Development under the No Project Alternative will be more of the same type of development and does not include key policies and land use changes necessary to spur employment and economic growth.

The No Project Alternative will not fulfill the objectives identified for the proposed SGCP and while it will not generally result in impacts with a different level of significance, it will result in no impacts to the following resource areas: conflict with or obstruct implementation of applicable air quality plans and conflict with any applicable land use plan, policy, or regulation.

## 6.4.2 Alternative 2: Downtown/Tropico Center Plan Alternative

### ■ Description

As outlined in Section 5.2, the proposed project is anticipated to result in significant and unavoidable impacts to Aesthetics, Air Quality, Greenhouse Gas Emissions, Population and Housing, Public Services, Recreation, and Transportation and Traffic. While the impact to these resources identified in relation to the proposed project is based on the speculative nature of the programmatic level of the land use plan, the potential for impacts at a future project-level can be further reduced by a reduction in the intensity of land uses, and associated trip generation, criteria pollutants and greenhouse gas emissions.

This Downtown/Tropico Center Plan Alternative has been developed in direct response to input received from City Council and the Housing Authority during the July 2016 workshops to promote pedestrian-connected neighborhood village areas, similar to Larchmont Village or Atwater Village in Los Angeles (Figure 6-1). In the workshops, City Council specifically mentioned South Glendale Avenue and the motel cluster at East Colorado Street as areas of interest. Alternative 2 also includes Verdugo Road and the area around Columbus School to serve neighborhoods north of Colorado Street. This alternative also builds upon previous plans and City investment in neighborhood centers, such as Adams Square and Pacific Edison. It is furthermore reflective of policy direction from the 1996 Greater Downtown Strategic Plan, which recommended surrounding downtown with a series of neighborhood centers.

Under this alternative, new investment and modest development is encouraged in a series of small business districts in the neighborhoods surrounding Downtown. These neighborhood centers are:

- Adams Square/Glendale Community College Garfield Campus area
- Columbus School/Pacific Gateway
- East Colorado (east of Verdugo Avenue)
- Pacific Edison Center
- South Glendale Avenue (south of Palmer Avenue)
- Verdugo Road

Additionally, South Central Avenue, which connects Downtown and Tropico, is proposed as a mixed-use main street of greater intensity than in the village centers, reflecting the frequency of transit service along this street. Zoning standards outside of the above-mentioned village centers, main streets, and Tropico planning areas would remain the same. It is estimated this alternative would yield an additional 5,400 to 7,400 dwelling units, between 48 percent and 28 percent fewer dwelling units when compared to up to 10,337 units under the proposed project.

With the exception of the majority of new development focused in Downtown and Tropico areas, all development in the SGCP area under Alternative 2 is assumed to be as outlined in the proposed project, and impacts would be the same but reduced given that between 48 percent and 28 percent fewer dwelling would be anticipated. Under Alternative 2, all proposed changes to land use, associated assumptions regarding growth, identified mitigation measures and compliance with General Plan goals and policies would be implemented in a manner identical to the proposed project. Further, all requirements to comply with existing and future regulations and guidance would remain the same as proposed under the proposed project.

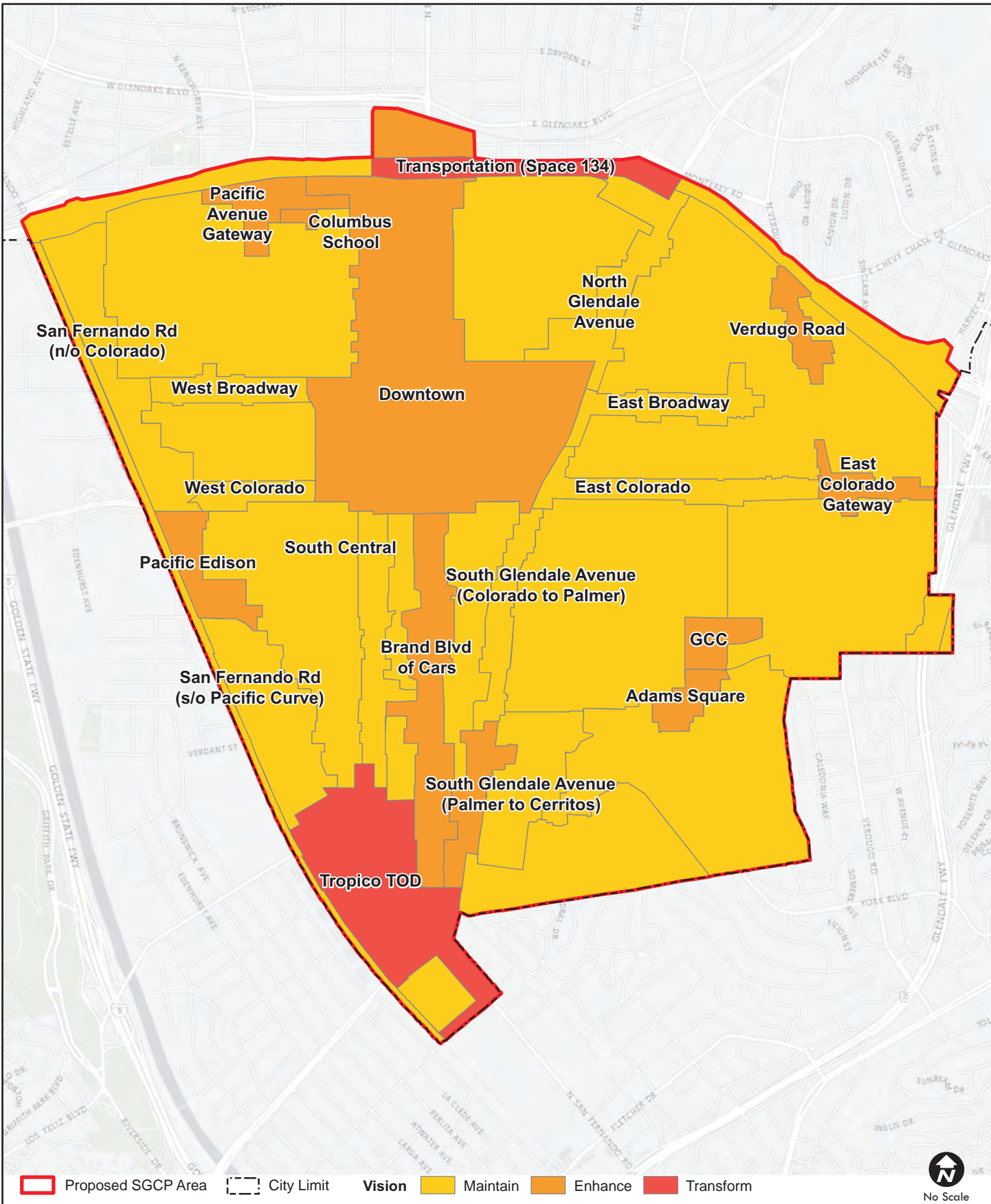


FIGURE 6-1

**Alternative 2 - Downtown/Tropico Center Plan Alternative**

Source: City of Glendale 2017



## ■ Environmental Analysis

### **Aesthetics**

There are no eligible or designated scenic highways within the proposed SGCP area. Similar to the proposed project, Alternative 2 would have no impact on scenic resources within a scenic highway. Alternative 2 would result in less than significant impacts to scenic vistas and day or nighttime views, given the highly urbanized project area's existing commercial, industrial, and residential development. Alternative 2 could result in changes to visual character of the SGCP area similar to the proposed project due to the future development coming on-line throughout the community. Future development of new multi-story buildings in the SGCP area may also create new sources of shade that could impact shadow-sensitive uses in the vicinities of the new development sites. However, these impacts would be slightly reduced compared to the proposed project due to between 48 percent and 28 percent less new development under Alternative 2 relative to the proposed project.

### **Agriculture/Forestry Resources**

The proposed SGCP area does not include Prime Farmland, Unique Farmland, Farmland of Statewide Importance, zoning for agricultural use, or forest land. Similar to the proposed project, Alternative 2 would have no impact on agriculture or forestry resources.

### **Air Quality**

The proposed project was determined to result in significant and unavoidable impacts related to a conflict with or obstruction of applicable air quality plans (SCAQMD's 2016 AQMP and SCAG's 2016 RTP/SCS), refer to Section 4.2.3 in this EIR. Similar to the proposed project, Alternative 2 would result in significant and unavoidable impacts related to a conflict with or obstruction of applicable air quality plans, as growth under Alternative 2 within South Glendale is also not accounted for in these relevant air quality plans. Implementation of mitigation measures *MM 4.2-1* and *MM 4.2-2* for the proposed project (discussed in Section 4.2.3) would reduce this impact, but not to a less than significant level. Therefore, Alternative 2 would conflict with an air quality plan(s) (SCAQMD's 2016 AQMP and SCAG's 2016 RTP/SCS, and the impact would remain significant and unavoidable.

The SCAB is currently in nonattainment for ozone, PM<sub>10</sub>, and PM<sub>2.5</sub>. Similar to the proposed project Alternative 2 would result in significant and unavoidable impacts associated with a contribution to an existing air quality violation or net increase of any criteria pollutant for which the air basin is in nonattainment. The proposed project was determined to result in significant and unavoidable impacts associated with the exposure of sensitive receptors to substantial pollutant concentrations. While Alternative 2 would result in air quality impacts, given existing sensitive receptors near substantial pollutant concentrations, slightly less impacts on air quality are anticipated under Alternative 2, given that 48 percent and 28 percent fewer dwelling units would be anticipated under Alternative 2 compared to the proposed project. Alternative 2 would be required to comply with SCAQMD's Rule 402 (Nuisance) which restricts the discharge of any odorous emission. Similar to the proposed project, the Alternative 2 would result in a slightly less than significant impact associated with objectionable odors, by 48 percent and 28 percent less than the proposed project.

### **Biological Resources**

The proposed SGCP area does not include riparian habitat or other sensitive natural communities, wildlife corridors or nursery sites, or adopted HCP or NCCP. Similar to the proposed project,



Alternative 2 would have no impact on riparian habitat or other sensitive natural communities, wildlife corridors or nursery sites, or an adopted HCP or NCCP. The proposed project was determined to result in less than significant impacts associated with federally protected wetlands and the protection of a biological resource. Alternative 2 would result in a less than significant impact associated with federally protected wetlands and the protection of a biological resource [Glendale Municipal Code, Chapter 12.44, protection of indigenous trees], and the impact would be reduced compared to the proposed project by 48 percent to 28 percent fewer dwelling units anticipated under Alternative 2.

Under Alternative 2, the loss of a special status species, an occupied nest or substantial interference with roosting and foraging for migratory species of special concern or raptors, as a result of future construction or demolition activities, would result in a potentially significant impact, similar to the proposed project. Alternative 2 would have a reduced impact associated with special-status species due to reduced land use intensity by 48 percent and 28 percent less than the proposed project. However, like the proposed project, Alternative 2 would require compliance with the Open Space and Conservation Element Policies 1 (Natural resources, including open spaces, biological habitats and native plant communities should be maintained and, where necessary, restored) and 5 (Proper management of environmental resources, especially natural resources, can assist in reducing hazards to the life and property of the City's residents and should be considered in project planning), and Goals 2 (Protect vital or sensitive open space areas including ridgelines, canyons, streams, geologic formations, watersheds and historic, cultural, aesthetic and ecologically significant areas from the negative impacts of development and urbanization), 4 (Develop a program that sustains the quality of Glendale's natural communities), and 7 (Continue programs which enhance community design and protect environmental resource quality). Compliance with these policies and goals would help to reduce any impacts associated with special-status species to a level below significant. Additionally, implementation of mitigation measure *MM 4.3-1* for the proposed project (discussed in Section 4.3.3) would require biological surveys prior to construction to determine the presence of a resident or migratory avian species, and reduce potential impacts to less than significant.

## **Cultural Resources**

The proposed project was determined to result in potentially significant impacts associated with historical resources. South Glendale contains 28 properties listed in the NRHP or local register and numerous properties that are potentially eligible for listing throughout the Downtown Specific Area, especially along East Colorado Street, South Central Avenue, South Glendale Avenue, and the Tropico District. These are identified in the South Glendale Historic Resource Survey, Appendix G in this EIR. Any disturbance to these properties would be considered a significant impact; similar to the proposed project, Alternative 2 would result in potentially significant impact to historical resources. Alteration or demolition of historic resources located within the SGCP area as anticipated under Alternative 2 would result in potentially significant impacts associated with historic resources; however, implementation of mitigation measures *MM 4.4-1*, and *MM 4.4-2* for the proposed project (discussed in Section 4.4.3) would reduce this impact to a less than significant level.

Future projects implemented under Alternative 2 would potentially result in new development and ground disturbing activities in areas containing undiscovered archaeological resources or unique paleontological resources or geologic features. Similar to the proposed project, this would be a potentially significant impact; however, implementation of mitigation measures *MM 4.4-3*, *MM 4.4-4*, *MM 4.4-5* and *MM 4.4-6* for the proposed project (discussed in Section 4.4.3) would reduce these impact to a less than significant level.

Although the SGCP area is nearly fully built-out and the discovery of human remains is not likely; the impact is considered potentially significant in the unlikely event that human remains are discovered during ground disturbing activities. Alternative 2 would result in similar potentially significant impacts associated with the discovery of human remains as the proposed project, should they be discovered; however, implementation of mitigation measures *MM 4.4-7* and *MM 4.4-8* for the proposed project (discussed in Section 4.4.3) would reduce this impact to a less than significant level.

The proposed project was determined to result in potentially significant impacts associated with tribal cultural resources, and Alternative 2 would result in similar potentially significant impacts due to the possibility of uncovering unknown tribal cultural resources. However, implementation of mitigation measures *MM 4.4-2*, *MM 4.4-3*, *MM 4.4-4*, and *MM 4.4-8* would reduce this impact to a less than significant level.

In summary, under Alternative 2, the impacts to cultural resources would be similar but slightly reduced compared to the proposed project given the 48 percent and 28 percent fewer dwelling units anticipated under Alternative 2.

### **Geology/Soils**

The proposed SGCP area does not include any areas that would require an individual septic system; therefore, Alternative 2 would not result in impacts associated with soil capable of supporting the use of a septic tank. The proposed project was determined to result in less than significant impacts associated with rupture of a known fault, strong seismic groundshaking, liquefaction, and landslides; substantial soil erosion or the loss of top soil; on or off-site lateral spreading, subsidence or collapse; and expansive soils. Similar to the proposed project, development associated with Alternative 2 would require compliance with the NPDES, CBC, UBC, and the County Grading Ordinance, which would reduce impacts associated with rupture of a known fault, strong seismic groundshaking, liquefaction, and landslides; substantial soil erosion or the loss of top soil; on or off-site lateral spreading, subsidence or collapse; and expansive soils, to a less than significant level. However, impacts associated with Alternative 2 would be slightly reduced compared to the proposed project given the 48 percent and 28 percent fewer dwelling units anticipated under Alternative 2.

### **Greenhouse Gas Emissions**

GHG emissions associated with future development would be generated during project construction and as a result of operations within the proposed SGCP area during and after buildout. While the proposed project was found to be generally consistent with relevant local goals, policies, and objectives in the Glendale General Plan (see Section 4.6.3 in this EIR), it is inconsistent with Air Quality Element Goal 1, Objectives 1.a (Reduce Glendale's contribution to regional emissions in a manner both efficient and equitable to residents and businesses, since emissions generated within Glendale affect regional air quality) and 1.c (Comply with the AQMP prepared by the SCAQMD and SCAG). Additionally, as of the 2014 first updated Scoping Plan, CARB recommends GHG emissions at the local plan-level not exceed 6 metric tons CO<sub>2</sub>e per capita per year by 2030 and no more than 2 metric tons CO<sub>2</sub>e per capita by 2050. Based on the emissions modeling conducted using CalEEMod version 2016.3.1, project-generated GHG emissions would result in 4.8 metric tons CO<sub>2</sub>e per capita per year at buildout of the proposed project in 2040, thus exceeding recommended levels needed to meet overall state GHG emissions targets. Therefore, the proposed project would not be consistent with statewide emissions limits established by AB 32, SB 32, SB 391, and Executive Orders S-3-05 and B-30-15. This is considered a potentially significant impact. Implementation of mitigation measures *MM 4.6-1*, as well as *MM 4.2-1* and *MM 4.2-2*

would reduce this impact, but not to a less than significant level, resulting in a significant and unavoidable impact.

The growth associated with Alternative 2 would result in a slightly reduced level of GHG emissions compared to the proposed project, given the 48 percent and 28 percent fewer dwelling units anticipated under Alternative 2; however, even with implementation of mitigation measures *MM 4.6-1*, as well as *MM 4.2-1 and MM 4.2-2* for the proposed project (discussed in Sections 4.6.3 and 4.2.3, respectively), the impact would ultimately be significant and unavoidable due to the existing ozone nonattainment within SCAB.

### **Hazards/Hazardous Materials**

There are no airports or airstrips within or near the proposed SGCP area. Similar to the proposed project, Alternative 2 would not result in impacts associated with a public airport or private airstrip. The proposed project was determined to result in less than significant impacts associated with the routine transport, use or disposal of hazardous materials; accidental release of hazardous materials into the environment; emitting hazardous emissions within 0.25 mile of an existing or proposed school; locating development on a site that is included on a list of hazardous materials sites pursuant to Government Code 65962.5; interfering with an adopted emergency response plan or emergency evacuation plan; or would increase the risk of loss, injury or death involving wildland fires. Similar to the proposed project, future development under Alternative 2 would result in impacts associated with the routine transport, use or disposal of hazardous materials; accidental release of hazardous materials into the environment; emitting hazardous emissions within 0.25 mile of an existing or proposed school; locating development on a site that is included on a list of hazardous materials sites pursuant to Government Code 65962.5; interfering with an adopted emergency response plan or emergency evacuation plan; or would increase the risk of loss, injury or death involving wildland fires. Alternative 2 would be required to comply with the same regulations as the proposed project as they relate to hazardous materials (i.e., RCRA, California Hazardous Waste Control Law, and CAPP). Compliance with these regulations would reduce any potentially significant impacts associated with hazardous materials to a level below significant; however, Alternative 2 would result in a slightly reduced impact compared to the proposed project given the 48 percent and 28 percent fewer dwelling units anticipated under Alternative 2.

### **Hydrology/Water Quality**

There is no 100-year flood hazard area within the proposed SGCP area, and the area is not at risk of inundation by seiche or tsunami. Similar to the proposed project, Alternative 2 would not result in impacts associated with 100-year flood hazard areas. The proposed project was determined to result in less than significant impacts associated with water quality standards or waste discharge requirements; groundwater supplies; erosion or siltation; flooding; exceedance of stormwater drainage system capacity; water quality; failure of a dam or levee; and inundation by mudflow. Similar to the proposed project, future development under Alternative 2 would result in impacts associated with water quality standards or waste discharge requirements; groundwater supplies; erosion or siltation; flooding; exceedance of stormwater drainage system capacity; water quality; failure of a dam or levee; and inundation by mudflow. Alternative 2 would be required to comply with the NPDES municipal permit, Storm Water and Urban Runoff Pollution Prevention Control, and SUSMP. Compliance with these regulations would reduce impacts associated with water quality, erosion or siltation, stormwater runoff, and flooding to a level below significant. Additionally, similar to the proposed project, Alternative 2 would result in less than significant impacts associated with groundwater supply, failure of a dam or levee, and inundation by mudflow. These impacts, although less than significant, would be slightly reduced compared to the

proposed project given the 48 percent and 28 percent fewer dwelling units anticipated under Alternative 2.

### **Land Use/Planning**

Similar to the proposed project, Alternative 2 would not result in an impact associated with dividing an established community or an adopted HCP or NCCP. As demonstrated in Section 4.9.3 of this EIR, the proposed project was determined to not be in conflict with the applicable polices and goals of the SCAG RTP/SCS and the Glendale General Plan. Thus, this impact is considered less than significant, and no mitigation is required. Similar to the proposed project, Alternative 2 would include amendments to the Glendale General Plan and Glendale Municipal Code Title 30 to modify the Zoning Ordinance and Zoning Map to bring about the principles and vision of the community. Alternative 2's consistency with each applicable goal, policy, and objective from the various elements of the SCAG RTP/SCS and Glendale General Plan would be the same as those for the proposed project, refer to Tables 4.9-3 and 4.9-4. Therefore, Alternative 2 would not be in conflict with the applicable polices and goals of the SCAG RTP/SCS and the Glendale General Plan. This impact is considered less than significant, and no mitigation is required.

### **Mineral Resources**

The proposed project was determined to result in less than significant impacts associated with known mineral resources and mineral resource recovery sites. The proposed SGCP area is highly urbanized and existing land uses preclude the availability of any known mineral resources or mineral resource extraction site. Similar to the proposed, project, Alternative 2 would result in less than significant impacts to mineral resources; however, these impacts would be reduced compared to the proposed project given the 48 percent and 28 percent fewer dwelling units anticipated under Alternative 2.

### **Noise**

Similar to the proposed project, Alternative 2 would not result in an impact associated with public or private airports and airstrips. The proposed project was determined to result in less than significant impacts associated with a permanent increase in ambient noise levels. Alternative 2 would result in a reduced impact associated with a permanent increase in ambient noise levels; however, the impact would remain less than significant. The proposed project was determined to result in potentially significant impacts associated with the generation of noise levels in excess of standards in the Glendale General Plan Noise Element. The dominant noise source affecting land use compatibility within the proposed SGCP area consists of vehicular traffic on adjacent roadways. Future noise levels within the proposed SGCP area, for residential land uses would be clearly unacceptable (i.e., greater than 75 dBA CNEL) at areas located within approximately 358 to 380 feet from the SR-134 edge of pavement and 264 feet from the SR-2 edge of pavement, and normally unacceptable (i.e., greater than 70 dBA CNEL) at areas located within approximately 613 to 637 feet from the SR-134 edge of pavement and 594 feet from the SR-2 edge of pavement. Although these areas are already developed, changes to the land use in these areas would result from implementation of the proposed SGCP, including the introduction of new sensitive land uses.

Development of new noise-sensitive land uses as a result of future projects within the proposed SGCP area may subject receptors in vicinities not shielded by existing highway noise barriers to noise levels that exceed General Plan guidelines. Noise policies, as contained in the General Plan Noise Element, the proposed SGCP, and regulations in the Glendale Municipal Code are in place to control and reduce noise levels from various land uses to levels below impact thresholds for certain new developments.

Plans and policies include the requirement for noise studies for new developments, limits on hours of operation for various noise-generating activities, and standards for the compatibility of land use types. Additionally, enforcement of the federal, State, and local noise regulations would control impacts. With the implementation of these policies and enforcement of the Noise Control chapter of the Glendale Municipal Code, impacts associated with compliance of the Glendale Municipal Code would be less than significant. Implementation of the proposed SGCP would expose receptors or result in the generation of noise levels in excess of standards established in the General Plan Noise Element; therefore, this is considered a potentially significant impact.

Similar to the proposed project, Alternative 2 would result in potentially significant impacts associated with the generation of noise levels from future development located within approximately 358 to 380 feet from the SR-134 edge of pavement and 264 feet from the SR-2 edge of pavement, and normally unacceptable (i.e., greater than 70 dBA CNEL) at areas located within approximately 613 to 637 feet from the SR-134 edge of pavement and 594 feet from the SR-2 edge of pavement. However, these impacts would be reduced compared to the proposed project given the 48 percent and 28 percent fewer dwelling units anticipated under Alternative 2. Implementation of Alternative 2 would expose receptors or result in the generation of noise levels in excess of standards established in the General Plan Noise Element; therefore, this is considered a potentially significant impact. However, implementation of mitigation measures *MM 4.11-1*, *MM 4.11-2*, and *MM 4.11-3* for the proposed project (discussed in Section 4.11.3) would reduce this impact to a less than significant level.

Depending on the construction activity and equipment being used as part of future development under Alternative 2, construction activities can generate groundborne vibration. Pile driving would potentially generate the highest groundborne vibration levels and is the primary concern in regard to human perception. Similar to the proposed project, Alternative 2 would have the potential to result in potentially significant impacts related to excessive groundborne vibration associated with construction; however, the impact would be reduced compared to the proposed project given the 48 percent and 28 percent fewer dwelling units anticipated under Alternative 2. Any future construction projects within the proposed SGCP area and in proximity to a noise sensitive area would be required to conduct specific environmental review to ensure that the project is in compliance with the Glendale Municipal Code, particularly Section 8.36.080 for construction noise, and any required noise mitigation elements. Additionally, implementation of mitigation measure *MM 4.11-4* for the proposed project (discussed in Section 4.11.3) would also reduce this impact to a less than significant level under Alternative 2.

Similar to the proposed project, future development under Alternative 2 would result in potentially significant impacts associated with temporary increase in ambient noise levels; however, the impact would be reduced compared to the proposed project given the 48 percent and 28 percent fewer dwelling units anticipated under Alternative 2. Any future construction projects within the proposed SGCP area and in proximity to a noise sensitive area would be required to conduct specific environmental review to ensure that the project is in compliance with the Glendale Municipal Code, particularly Section 8.36.080 for construction noise, and any required noise mitigation elements. Additionally, implementation of mitigation measure *MM 4.11-5* for the proposed project (discussed in Section 4.11.3) would also reduce this impact to a less than significant level under Alternative 2.

### **Population/Housing**

The proposed project was determined to result in less than significant impacts associated with the displacement of housing and people, and significant and unavoidable impacts associated with inducement of population growth. As with the proposed project, although implementation of Alternative 2 does not

involve direct development, it allows for an increase of between 5,400 and 7,400 new dwelling units in the proposed SGCP area. This growth would not exceed SCAGs forecasted growth of 8,700 dwelling units for the entire City (refer to Table 4.12-1). An increase of between 5,400 and 7,400 dwelling units would result in a population increase of approximately 14,580 and 19,980 people, respectively, within the proposed SGCP area under Alternative 2; the increase is calculated using SCAG's 2017 Profile of the City 2.7 average persons per household. SCAG projects an increase in population of 20,800 residents within the City by 2040 (Table 4.12-1); therefore, the growth associated with Alternative 2 would not exceed the projected growth for the entire City. As such, the growth associated with Alternative 2 is accounted for in current regional planning documents (SCAG 2008 Regional Comprehensive Plan, SCAG 2016-2040 RTP/SCS, and SCAG Compass Growth Visioning Plan); therefore, Alternative 2 would result in less than significant impacts associated with population growth. However, Alternative 2 would preclude economic development in areas outside of Downtown and Tropic areas and thus would not allow for the benefits anticipated under the proposed project.

### **Public Services**

The proposed project was determined to result in significant and unavoidable impacts associated with fire protection and police protection, and less than significant impacts to school and library services. Implementation of Alternative 2 would result in a population increase of between 14,580 and 19,980 people, and the total population in the SGCP area would increase from 116,918 to 122,318. Similar to the proposed project, the increase in population would create a need for fire protection services, police protection, schools and libraries.

Alternative 2 would contribute to the population growth and increasing demands for school services within the proposed SGCP area. To maintain acceptable service ratios, the construction of new or expanded school facilities may be required. In accordance with SB 50, at the time of building permit issuance, development projects are required to pay established school impact fees. Funding collected under SB 50 would reduce impacts to GUSD facilities, which serve the proposed SGCP area to a less than significant level. Implementation of Alternative 2 would also result in the potential for increased demand for library services within the proposed SGCP area, requiring the expansion and construction of new facilities. The addition of between 14,580 and 19,980 people residents (between 48 percent and 28 percent fewer residents when compared to the proposed project) would have adequate library services, as the citywide volume per resident ratio would be above the City standard similar to the proposed project. The impact of the proposed SGCP on library services would be less than significant. Under Alternative 2, as with development under the proposed project, any future development would be required to pay development fees that are collected by the City to support these public facilities that would help to reduce potential impacts; however, the impacts to schools and library services would be slightly less under Alternative 2 when compared to the proposed project given between 48 percent and 28 percent fewer residents anticipated under Alternative 2.

Similar to the proposed project, additional residents under Alternative 2 would create additional demand on the GFD, specifically for the three stations located within the proposed SGCP area: Fire Station 21, Fire Station 22, and Fire Station 25. Thus, the increase in population within the proposed SGCP area would have a potentially significant impact on fire protection services. The City does not have any programs in place, which allows the collection of development impact fees to mitigate impacts to fire protection services, including the provision of new or physically altered fire facilities.

Similar to the proposed project, development under Alternative 2 would comply with all local, State, and federal regulations pertaining to fire protection. In addition, all discretionary projects are subject to

environmental review and standard mitigation measures are applied as part of the conditions of approval for the project. The GFD's ability to maintain current workload/service levels would be reduced through a larger population requiring fire protection services. This is considered to be a significant and unavoidable impact. There is no feasible mitigation to reduce the impact; therefore, this impact is considered significant and unavoidable.

Likewise, Alternative 2 would contribute to population growth, increasing demands for police protection services. An increased population as permitted by Alternative 2 would exacerbate this deficiency; thus, the impact to police staffing levels is considered a significant and unavoidable impact. There is no feasible mitigation to reduce the impact; therefore, this impact is considered significant and unavoidable. However, the Alternative 2 would result in slightly reduced impacts to fire protection and police protection services when compared to the proposed project given between 48 percent and 28 percent fewer residents anticipated under Alternative 2.

## **Recreation**

The proposed project was determined to result in significant and unavoidable impacts associated with physical deterioration and the expansion of recreational facilities. As discussed in Section 4.12 (Population and Housing), implementation of the proposed SCGP would potentially result in a population increase of 27,910 people, which would bring the total population within the proposed SGCP area to 130,248 people. Applying the minimum NRPA standards of 6 acres per 1,000 residents to the City would require a total of approximately 781 acres of developed parkland. Presently, there is approximately 285 acres of developed parkland within the City, indicating a deficit of 496 acres. Future development under Alternative 2 would result in a population increase of between 14,580 and 19,980 people, and the total population in the SGCP area would increase from 116,918 to 122,318. Applying the minimum NRPA standards of 6 acres per 1,000 residents to the City would require a total of approximately 702 acres to 733 acres of developed parkland; indicating a deficit of between 417 and 448 acres (a decrease of between 79 and 48 acres when compared to the proposed project).

The City is planning for the development of a new recreation use along SR-134 that would comprise of 25 acres of recreational uses (i.e., Space 134). The 25-acre increase would bring the total parkland to 48.19 acres of parkland available to residents within the proposed SGCP area. The parkland ratio would increase to 0.47 acre of parkland per 1,000 persons, a 104 percent increase to the existing 0.23 acre per 1,000 persons.

Future development within the proposed SGCP area would be required to comply with the minimum NRPA and Quimby Act standards. Specifically, this requires that 6 acres of land for each 1,000 residents be devoted to local park and recreational purposes. This could be met through land dedication or payment of park fees, or a combination of both. While dedicated parkland directly increases the available recreation space within the City for residents, the payment of park fees from new development would be allocated to fund the acquisition and/or development of future parks or facility renovations associated with increased use of public facilities.

Adherence to existing applicable local regulations and implementation of the provisions in the Quimby Act would ensure that parks and open space are acquired, developed, improved, and expanded as future residential projects are constructed. Similar to the proposed SGCP, Alternative 2 is not a physical project and does not directly create an impact; however, development resulting from future development anticipated under Alternative 2 would be subject to development impact fees in order to mitigate any potential impacts associated with parklands. Any open space, facilities or parks proposed for establishment at a later date would require separate environmental review under CEQA and development

impact fees; however, Alternative 2 will remain deficient in parkland despite the increases in parkland acreages.

Therefore, similar to the proposed project, Alternative 2 could result in potentially significant and unavoidable direct impacts from the construction or expansion of recreational facilities. However, Alternative 2 would result in slightly reduced impacts to recreational facilities when compared to the proposed project given between 48 percent and 28 percent fewer residents anticipated under Alternative 2.

### **Traffic/Transportation**

The proposed project was determined to not result in an impact associated with air traffic patterns; Alternative 2 would not result in an impact associated with air traffic patterns.

The proposed project was determined to result in a less than significant impact associated with conflict with applicable plans, ordinances, and policies; hazards; and emergency access. Alternative 2 would not conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, as the growth associated with Alternative 2 is accounted for in the most recent adopted transportation plan (2016 RTP/SCS). Additionally, Alternative 2 would result in similar less than significant impacts associated with hazards and emergency as the proposed project. Alternative 2 does not propose the development of any roads, which may be hazardous, and the existing emergency access plans consider the growth and development associated with Alternative 2.

The Transportation Analysis prepared for the proposed SGCP (Fehr & Peers 2017), refer to Appendix F in this EIR, determined that the proposed project would result in significant and unavoidable impacts associated with LOS standards. Under existing conditions 7 intersections operate at LOS D or worse during the AM peak hour and 13 intersections operate at LOS D or worse during the PM peak hour. The operating conditions for Alternative 2 are the same as the proposed project: 19 intersections operate at LOS D or worse during the AM peak hour and 24 intersections operate at LOS D or worse during the PM peak hour. Similar to the proposed project, this impact would be significant and unavoidable.

Additionally, mainline freeway operating conditions analysis indicates four of the eight CMP freeway study locations are significantly impacted under Alternative 2; however, each of these locations already operates at LOS F under existing (2016) conditions as well as under the proposed project scenario. Alternative 2 would therefore result in similar significant and unavoidable impacts as the proposed project.

Implementation of fully feasible mitigation measures *MM 4.15-1* through *MM 4.15-5* for the proposed project (as discussed in Section 4.15.3) would reduce the impacts at the five associated intersections (Brand Boulevard & Glenoaks Boulevard, Glendale Avenue & Monterey Road, Harvey Drive & Wilson Avenue, Central Avenue & Colorado Street, and Central Avenue & Los Feliz Road) under Alternative 2 to a level below significant. The three dual-jurisdiction and mitigation measures (*MM 4.15-6* through *MM 4.15-8*) and two partially infeasible mitigation measures (*MM 4.15-9* through *MM 4.15-10*) for the proposed project (as discussed in Section 4.15.3) would reduce the impact at the associated intersections (Pacific Avenue & SR-134 WB Ramps, Pacific Avenue & SR-134 EB Ramps, SR-134 WB Ramps & Monterey Road, Central Avenue & Goode Avenue, and Verdugo Road & Broadway, respectively) under Alternative 2; however, the mitigation measures would not reduce the impact to a level below significant. Therefore, similar to the proposed project, impacts to the remaining intersections listed in Table 4.15-9 cannot be mitigated, and the impacts would remain significant and unavoidable under Alternative 2.



## **Utilities/Service Systems**

The proposed project was determined to result in less than significant impacts associated with wastewater treatment requirements, wastewater treatment capacity, stormwater drainage facilities, water supplies, landfill capacity, solid waste regulations, and energy production or transmission facilities. Alternative 2, similar to the proposed project, would allow for increased land use intensity within the proposed SGCP area and would result in an increase in dwelling units and population. The increase in dwelling units and population within the proposed SGCP area would increase wastewater treatment demand, potentially increase the amount of runoff within the proposed SGCP area, increase demand for natural gas over existing conditions. All future projects under Alternative 2 would require environmental review to identify any potential impacts and present feasible mitigation measures to reduce the identified impacts. Therefore, future development anticipated under Alternative 2 would result in less than significant impacts associated with wastewater treatment requirements, wastewater treatment capacity, stormwater drainage facilities, water supplies, landfill capacity, solid waste regulations, and energy production or transmission facilities, but would be less when compared to the proposed project given between 48 percent and 28 percent fewer residents anticipated under Alternative 2.

## **■ Attainment of Project Objectives**

Development anticipated under Alternative 2 would result in an increase of between 5,400 and 7,400 dwelling units and between 14,580 and 19,980 residents when compared to an increase of 10,337 dwellings and 27,910 residents between 48 percent and 28 percent fewer residents under the proposed project scenario.

Alternative 2 would meet most of the objectives identified for the proposed project (refer to Section 6.1 above) in that it would allow for land uses consistent with the existing character of the City and continue to provide sufficient infrastructure to meet demand. However, Alternative 2 would not fully meet the proposed project objectives that will act as a catalyst to move the City into the coming decades, because the majority of future development under Alternative 2 would be focused in the Downtown and Tropic areas. Further, zoning standards outside of the above-mentioned village centers, main streets, and Tropic planning areas (i.e., Adams Square/Glendale Community College Garfield Campus area, Columbus School/Pacific Gateway, East Colorado (east of Verdugo Avenue), Pacific Edison Center, South Glendale Ave (south of Palmer Avenue), Verdugo Road) would remain the same.

While the No Project Alternative will not generally result in impacts with a different level of significance when compared to the proposed project, Alternative 2 will not fulfill the objectives identified for the proposed SGCP.

### 6.4.3 Alternative 3: East Broadway/South Central Avenue Development Alternative

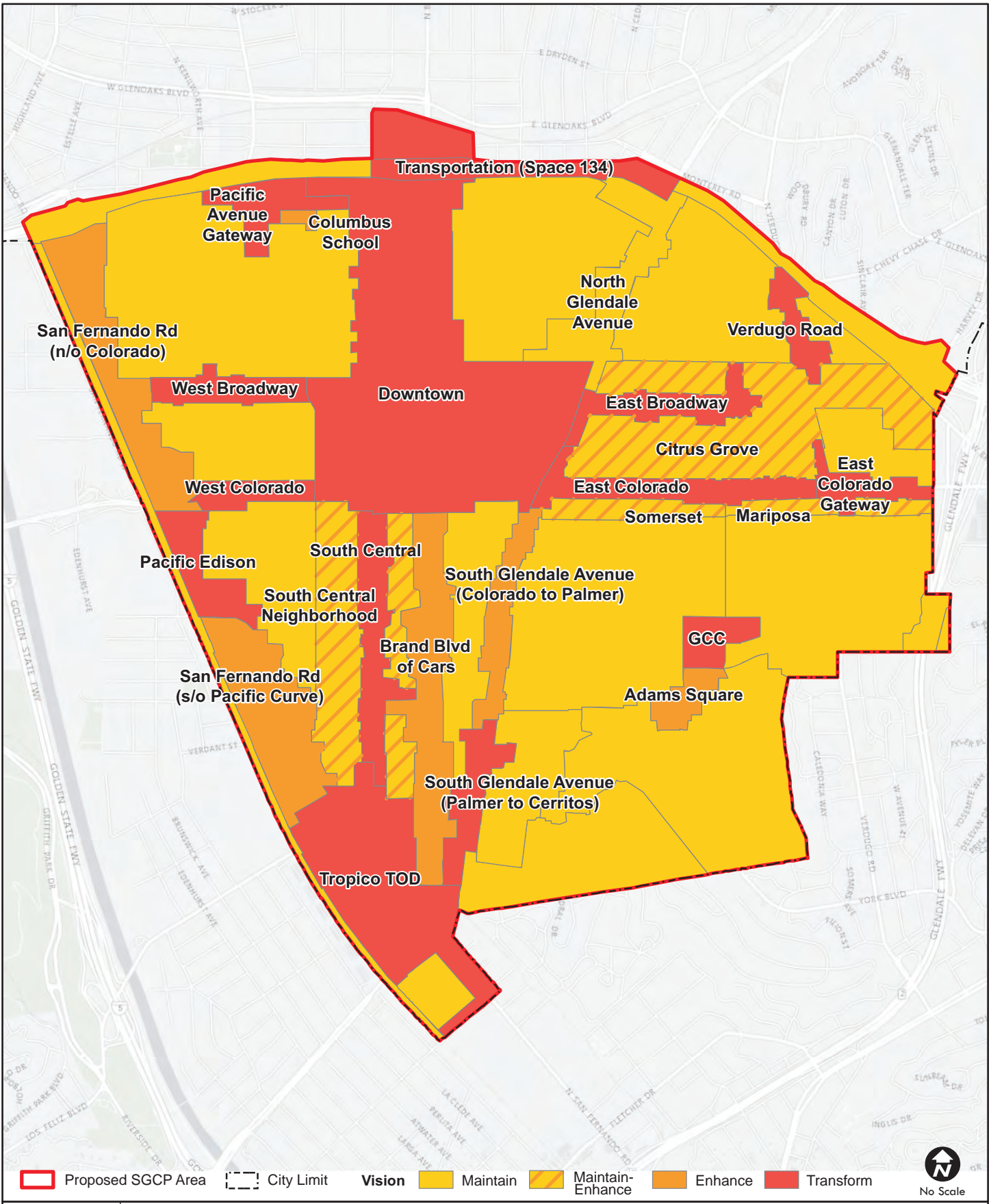
#### ■ Description

As outlined in Section 5.2, the proposed project is anticipated to result in significant and unavoidable impacts to Aesthetics, Air Quality, Greenhouse Gas Emissions, Population and Housing, Public Services, Recreation, and Transportation and Traffic. While the impact to these resources identified in relation to the proposed project is based on the speculative nature of the programmatic level of the land use plan, the potential for impacts at a future project-level can be further reduced by a reduction in the intensity of land uses, and associated trip generation, criteria pollutants and greenhouse gas emissions.

Similar to Alternative 2, this alternative has been developed in direct response to input received from City Council and the Housing Authority during the July 2016 workshops. As presented in the July 2016 workshops, the most heavily used transit corridor in South Glendale today is Metro's 780/180/181 route running on East Broadway from Eagle Rock and Pasadena, then turning south on Central Avenue before heading to Hollywood via Los Feliz Boulevard. In the absence of new transit investment, these corridors, represent the most transit-rich location for new development outside of the Downtown and Tropic planning areas.

Alternative 3 proposes: 1) a new mixed-use zoning standards for properties fronting East Broadway and South Central Avenue; 2) up-zone the multi-family blocks parallel to these two corridors as an "affordable housing overlay zone;" 3) a similar re-zoning along East Colorado Street under the premise that Metro would route its planned east-west Pasadena-NoHo Bus Rapid Transit route along Colorado-Central-Glenoaks; and 4) selected down and/or re-zoning on West Broadway, which does not have the same frequency of transit service as East Broadway (Figure 6-2). As presented at the July 2016 workshops, Metro is presently planning this rapid transit corridor, and anticipates service beginning by 2022. City staff estimates this alternative might yield over the lifespan of the EIR approximately 7,400 to 9,400 dwelling units, between 28 percent and 9 percent fewer dwelling units when compared to up to 10,337 units under the proposed project.

With the exception of the majority of new development focused around Metro's 780/180/181 route running on East Broadway to Central Avenue, all development in the SGCP area under Alternative 3 is assumed to be as outlined in the proposed project, and impacts would be the same but reduced given between 28 percent and 9 percent fewer dwelling units, unless identified in the discussions below. Under Alternative 3, all proposed changes to land use, associated assumptions regarding growth, identified mitigation measures and compliance with General Plan goals and policies would be implemented in a manner identical to the proposed project. Further, all requirements to comply with existing and future regulations and guidance would remain the same as proposed under the proposed project.



**FIGURE 6-2**  
**Alternative 3 - East/Broadway/South Central Avenue Development Alternative**

Source: City of Glendale 2017



## ■ Environmental Analysis

### **Aesthetics**

There are no eligible or designated scenic highways within the proposed SGCP area. Similar to the proposed project, Alternative 3 would have no impact on scenic resources within a scenic highway. Alternative 3 would result in less than significant impacts to scenic vistas and day or nighttime views, given the highly urbanized project area's existing commercial, industrial, and residential development. Alternative 3 could result in changes to visual character of the SGCP area similar to the proposed project due to the future development coming on-line throughout the community. Future development of new multi-story buildings in the SGCP area may also create new sources of shade that could impact shadow-sensitive uses in the vicinities of the new development sites. However, these impacts would be slightly reduced compared to the proposed project due to between 28 percent and 9 percent less new development under Alternative 3 relative to the proposed project.

### **Agriculture/Forestry Resources**

The proposed SGCP area does not include Prime Farmland, Unique Farmland, Farmland of Statewide Importance, zoning for agricultural use, or forest land; therefore, identical to the proposed project, Alternative 3 would have no impact on agriculture or forestry resources.

### **Air Quality**

The proposed project was determined to result in significant and unavoidable impacts related to a conflict with or obstruction of applicable air quality plans (SCAQMD's 2016 AQMP and SCAG's 2016 RTP/SCS) refer to Section 4.2.3 in this EIR. Similar to the proposed project, Alternative 3 would result in significant and unavoidable impacts related to a conflict with or obstruction of applicable air quality plans, as growth under Alternative 3 within South Glendale is also not accounted for in these relevant air quality plans. Implementation of mitigation measures *MM 4.2-1* and *MM 4.2-2* for the proposed project (discussed in Section 4.2.3) would reduce this impact, but not to a less than significant level. Therefore, Alternative 3 would conflict with an air quality plan(s) (SCAQMD's 2016 AQMP and SCAG's 2016 RTP/SCS, and the impact would remain significant and unavoidable.

The SCAB is currently in nonattainment for ozone, PM<sub>10</sub>, and PM<sub>2.5</sub>. Similar to the proposed project Alternative 2 would result in significant and unavoidable impacts associated with a contribution to an existing air quality violation or net increase of any criteria pollutant for which the air basin is in nonattainment. The proposed project was determined to result in significant and unavoidable impacts associated with the exposure of sensitive receptors to substantial pollutant concentrations. While the Alternative 3 would result in air quality impacts, given existing sensitive receptors near substantial pollutant concentrations, slightly less impacts on air quality are anticipated under Alternative 3, given that between 28 percent and 9 percent fewer dwelling units would be anticipated under Alternative 3 compared to the proposed project. Alternative 3 would be required to comply with SCAQMD's Rule 402 (Nuisance) which restricts the discharge of any odorous emission. Similar to the proposed project, the Alternative 3 would result in a slightly less than significant impact associated with objectionable odors, by 28 percent and 9 percent less than the proposed project.

### **Biological Resources**

The proposed SGCP area does not include riparian habitat or other sensitive natural communities, wildlife corridors or nursery sites, or adopted HCP or NCCP. Similar to the proposed project, Alternative 3 would have no impact on riparian habitat or other sensitive natural communities, wildlife

corridors or nursery sites, or an adopted HCP or NCCP. The proposed project was determined to result in less than significant impacts associated with federally protected wetlands and the protection of a biological resource. Alternative 3 would result in a less than significant impact associated with federally protected wetlands and the protection of a biological resource [Glendale Municipal Code, Chapter 12.44, protection of indigenous trees], and the impact would be reduced compared to the proposed project by between 28 percent and 9 percent fewer dwelling units anticipated under Alternative 3.

Under Alternative 3, the loss of a special status species, an occupied nest or substantial interference with roosting and foraging for migratory species of special concern or raptors, as a result of future construction or demolition activities, would result in a potentially significant impact, similar to the proposed project. Alternative 3 would have a reduced impact associated with special-status species due to reduced land use intensity by 28 percent and 9 percent less than the proposed project. However, like the proposed project, Alternative 3 would require compliance with the Open Space and Conservation Element Policies 1 (Natural resources, including open spaces, biological habitats and native plant communities should be maintained and, where necessary, restored) and 5 (Proper management of environmental resources, especially natural resources, can assist in reducing hazards to the life and property of the City's residents and should be considered in project planning), and Goals 2 (Protect vital or sensitive open space areas including ridgelines, canyons, streams, geologic formations, watersheds and historic, cultural, aesthetic and ecologically significant areas from the negative impacts of development and urbanization), 4 (Develop a program that sustains the quality of Glendale's natural communities), and 7 (Continue programs which enhance community design and protect environmental resource quality). Compliance with these policies and goals would help to reduce any impacts associated with special-status species to a level below significant. Additionally, implementation of mitigation measure *MM 4.3-1* for the proposed project (discussed in Section 4.3.3) would require biological surveys prior to construction to determine the presence of a resident or migratory avian species, and reduce potential impacts to less than significant.

### **Cultural Resources**

The proposed project was determined to result in potentially significant impacts associated with historical resources. South Glendale contains 28 properties listed in the NRHP or local register and numerous properties that are potentially eligible for listing throughout the Downtown Specific Area, especially along East Colorado Street, South Central Avenue, South Glendale Avenue, and the Tropico District. These are identified in the South Glendale Historic Resource Survey, Appendix G in this EIR. Any disturbance to these properties would be considered a significant impact; similar to the proposed project, Alternative 3 would result in potentially significant impact to historical resources. Alteration or demolition of historic resources located within the SGCP area as anticipated under Alternative 3 would result in potentially significant impacts associated with historic resources; however, implementation of mitigation measures *MM 4.4-1*, and *MM 4.4-2* for the proposed project (discussed in Section 4.4.3) would reduce this impact to a less than significant level.

Future projects implemented under Alternative 3 would potentially result in new development and ground disturbing activities in areas containing undiscovered archaeological resources or unique paleontological resources or geologic features. Similar to the proposed project, this would be a potentially significant impact; however, implementation of mitigation measures *MM 4.4-3*, *MM 4.4-4*, *MM 4.4-5* and *MM 4.4-6* for the proposed project (discussed in Section 4.4.3) would reduce these impact to a less than significant level.

Although the SGCP area is nearly fully built-out and the discovery of human remains is not likely; the impact is considered potentially significant in the unlikely event that human remains are discovered during ground disturbing activities. Alternative 3 would result in similar potentially significant impacts associated with the discovery of human remains as the proposed project, should they be discovered; however, implementation of mitigation measures *MM 4.4-7* and *MM 4.4-8* for the proposed project (discussed in Section 4.4.3) would reduce this impact to a less than significant level.

The proposed project was determined to result in potentially significant impacts associated with tribal cultural resources, and Alternative 3 would result in similar potentially significant impacts due to the possibility of uncovering unknown tribal cultural resources. However, implementation of mitigation measures *MM 4.4-2*, *MM 4.4-3*, *MM 4.4-4*, and *MM 4.4-8* would reduce this impact to a less than significant level.

In summary, under Alternative 23 the impacts to cultural resources would be similar but slightly reduced compared to the proposed project given the 28 percent and 9 percent fewer dwelling units anticipated under Alternative 2.

### **Geology/Soils**

The proposed SGCP area does not include any areas that would require an individual septic system; therefore, Alternative 3 would not result in impacts associated with soil capable of supporting the use of a septic tank. The proposed project was determined to result in less than significant impacts associated with rupture of a known fault, strong seismic groundshaking, liquefaction, and landslides; substantial soil erosion or the loss of top soil; on or off-site lateral spreading, subsidence or collapse; and expansive soils. Similar to the proposed project, development associated with Alternative 3 would require compliance with the NPDES, CBC, UBC, and the County Grading Ordinance, which would reduce impacts associated with rupture of a known fault, strong seismic groundshaking, liquefaction, and landslides; substantial soil erosion or the loss of top soil; on or off-site lateral spreading, subsidence or collapse; and expansive soils, to a less than significant level. However, impacts associated with Alternative 3 would be slightly reduced compared to the proposed project given the 28 percent and 9 percent fewer dwelling units anticipated under Alternative 3.

### **Greenhouse Gas Emissions**

GHG emissions associated with future development would be generated during project construction and as a result of operations within the proposed SGCP area during and after buildout. While the proposed project was found to be generally consistent with relevant local goals, policies, and objectives in the Glendale General Plan (see Section 4.6.3 in this EIR), it is inconsistent with Air Quality Element Goal 1, Objectives 1.a (Reduce Glendale's contribution to regional emissions in a manner both efficient and equitable to residents and businesses, since emissions generated within Glendale affect regional air quality) and 1.c (Comply with the AQMP prepared by the SCAQMD and SCAG). Additionally, as of the 2014 first updated Scoping Plan, CARB recommends GHG emissions at the local plan-level not exceed 6 metric tons CO<sub>2</sub>e per capita per year by 2030 and no more than 2 metric tons CO<sub>2</sub>e per capita by 2050. Based on the emissions modeling conducted using CalEEMod version 2016.3.1, project-generated GHG emissions would result in 4.8 metric tons CO<sub>2</sub>e per capita per year at buildout of the proposed project in 2040, thus exceeding recommended levels needed to meet overall state GHG emissions targets. Therefore, the proposed project would not be consistent with statewide emissions limits established by AB 32, SB 32, SB 391, and Executive Orders S-3-05 and B-30-15. This is considered a potentially significant impact. Implementation of mitigation measures *MM 4.6-1*, as well as *MM 4.2-1* and *MM 4.2-2*

would reduce this impact, but not to a less than significant level, resulting in a significant and unavoidable impact.

The growth associated with Alternative 3 would result in a slightly reduced level of GHG emissions compared to the proposed project, given the 28 percent and 9 percent fewer dwelling units anticipated under Alternative 3; however, even with implementation of mitigation measures *MM 4.6-1*, as well as *MM 4.2-1 and MM 4.2-2* for the proposed project (discussed in Sections 4.6.3 and 4.2.3, respectively), the impact would ultimately be significant and unavoidable due to the existing ozone nonattainment within SCAB.

### **Hazards/Hazardous Materials**

There are no airports or airstrips within or near the proposed SGCP area. Similar to the proposed project, Alternative 3 would not result in impacts associated with a public airport or private airstrip. The proposed project was determined to result in less than significant impacts associated with the routine transport, use or disposal of hazardous materials; accidental release of hazardous materials into the environment; emitting hazardous emissions within 0.25 mile of an existing or proposed school; locating development on a site that is included on a list of hazardous materials sites pursuant to Government Code 65962.5; interfering with an adopted emergency response plan or emergency evacuation plan; or would increase the risk of loss, injury or death involving wildland fires. Similar to the proposed project, future development under Alternative 3 would result in impacts associated with the routine transport, use or disposal of hazardous materials; accidental release of hazardous materials into the environment; emitting hazardous emissions within 0.25 mile of an existing or proposed school; locating development on a site that is included on a list of hazardous materials sites pursuant to Government Code 65962.5; interfering with an adopted emergency response plan or emergency evacuation plan; or would increase the risk of loss, injury or death involving wildland fires. Alternative 3 would be required to comply with the same regulations as the proposed project as they relate to hazardous materials (i.e., RCRA, California Hazardous Waste Control Law, and CAPP). Compliance with these regulations would reduce any potentially significant impacts associated with hazardous materials to a level below significant; however, Alternative 3 would result in a slightly reduced impact compared to the proposed project given the 28 percent and 9 percent fewer dwelling units anticipated under Alternative 3.

### **Hydrology/Water Quality**

There is no 100-year flood hazard area within the proposed SGCP area, and the area is not at risk of inundation by seiche or tsunami. Similar to the proposed project, Alternative 3 would not result in impacts associated with 100-year flood hazard areas. The proposed project was determined to result in less than significant impacts associated with water quality standards or waste discharge requirements; groundwater supplies; erosion or siltation; flooding; exceedance of stormwater drainage system capacity; water quality; failure of a dam or levee; and inundation by mudflow. Similar to the proposed project, future development under Alternative 3 would result in impacts associated with water quality standards or waste discharge requirements; groundwater supplies; erosion or siltation; flooding; exceedance of stormwater drainage system capacity; water quality; failure of a dam or levee; and inundation by mudflow. Alternative 3 would be required to comply with the NPDES municipal permit, Storm Water and Urban Runoff Pollution Prevention Control, and SUSMP. Compliance with these regulations would reduce impacts associated with water quality, erosion or siltation, stormwater runoff, and flooding to a level below significant. Additionally, similar to the proposed project, Alternative 3 would result in less than significant impacts associated with groundwater supply, failure of a dam or levee, and inundation by

mudflow. These impacts, although less than significant, would be slightly reduced compared to the proposed project given the 28 percent and 9 percent fewer dwelling units anticipated under Alternative 3.

### **Land Use/Planning**

Similar to the proposed project, Alternative 3 would not result in an impact associated with dividing an established community or an adopted HCP or NCCP. As demonstrated in Section 4.9.3 of this EIR, the proposed project was determined to not be in conflict with the applicable polices and goals of the SCAG RTP/SCS and the Glendale General Plan. Thus, this impact is considered less than significant, and no mitigation is required. Similar to the proposed project, Alternative 3 would include amendments to the Glendale General Plan and Glendale Municipal Code Title 30 to modify the Zoning Ordinance and Zoning Map to bring about the principles and vision of the community. Alternative 3's consistency with each applicable goal, policy, and objective from the various elements of the SCAG RTP/SCS and Glendale General Plan would be the same as those for the proposed project, refer to Tables 4.9-3 and 4.9-4. Therefore, Alternative 3 would not be in conflict with the applicable polices and goals of the SCAG RTP/SCS and the Glendale General Plan. This impact is considered less than significant, and no mitigation is required.

### **Mineral Resources**

The proposed project was determined to result in less than significant impacts associated with known mineral resources and mineral resource recovery sites. The proposed SGCP area is highly urbanized and existing land uses preclude the availability of any known mineral resources or mineral resource extraction site. Similar to the proposed, project, Alternative 3 would result in less than significant impacts to mineral resources; however, these impacts would be reduced compared to the proposed project given the 28 percent and 9 percent fewer dwelling units anticipated under Alternative 3.

### **Noise**

Similar to the proposed project, Alternative 3 would not result in an impact associated with public or private airports and airstrips. The proposed project was determined to result in less than significant impacts associated with a permanent increase in ambient noise levels. Alternative 3 would result in a reduced impact associated with a permanent increase in ambient noise levels; however, the impact would remain less than significant. The proposed project was determined to result in potentially significant impacts associated with the generation of noise levels in excess of standards in the Glendale General Plan Noise Element. The dominant noise source affecting land use compatibility within the proposed SGCP area consists of vehicular traffic on adjacent roadways. Future noise levels within the proposed SGCP area, for residential land uses would be clearly unacceptable (i.e., greater than 75 dBA CNEL) at areas located within approximately 358 to 380 feet from the SR-134 edge of pavement and 264 feet from the SR-2 edge of pavement, and normally unacceptable (i.e., greater than 70 dBA CNEL) at areas located within approximately 613 to 637 feet from the SR-134 edge of pavement and 594 feet from the SR-2 edge of pavement. Although these areas are already developed, changes to the land use in these areas would result from implementation of the proposed SGCP, including the introduction of new sensitive land uses.

Development of new noise-sensitive land uses as a result of future projects within the proposed SGCP area may subject receptors in vicinities not shielded by existing highway noise barriers to noise levels that exceed General Plan guidelines. Noise policies, as contained in the General Plan Noise Element, the proposed SGCP, and regulations in the Glendale Municipal Code are in place to control and reduce noise levels from various land uses to levels below impact thresholds for certain new developments.



Plans and policies include the requirement for noise studies for new developments, limits on hours of operation for various noise-generating activities, and standards for the compatibility of land use types. Additionally, enforcement of the federal, State, and local noise regulations would control impacts. With the implementation of these policies and enforcement of the Noise Control chapter of the Glendale Municipal Code, impacts associated with compliance of the Glendale Municipal Code would be less than significant. Implementation of the proposed SGCP would expose receptors or result in the generation of noise levels in excess of standards established in the General Plan Noise Element; therefore, this is considered a potentially significant impact.

Similar to the proposed project, Alternative 3 would result in potentially significant impacts associated with the generation of noise levels from future development located within approximately 358 to 380 feet from the SR-134 edge of pavement and 264 feet from the SR-2 edge of pavement, and normally unacceptable (i.e., greater than 70 dBA CNEL) at areas located within approximately 613 to 637 feet from the SR-134 edge of pavement and 594 feet from the SR-2 edge of pavement. However, these impacts would be reduced compared to the proposed project given the 28 percent and 9 percent fewer dwelling units anticipated under Alternative 3. Implementation of Alternative 3 would expose receptors or result in the generation of noise levels in excess of standards established in the General Plan Noise Element; therefore, this is considered a potentially significant impact. However, implementation of mitigation measures *MM 4.11-1*, *MM 4.11-2*, and *MM 4.11-3* for the proposed project (discussed in Section 4.11.3) would reduce this impact to a less than significant level.

Depending on the construction activity and equipment being used as part of future development under Alternative 3, construction activities can generate groundborne vibration. Pile driving would potentially generate the highest groundborne vibration levels and is the primary concern in regard to human perception. Similar to the proposed project, Alternative 3 would have the potential to result in potentially significant impacts related to excessive groundborne vibration associated with construction; however, the impact would be reduced compared to the proposed project given the 28 percent and 9 percent fewer dwelling units anticipated under Alternative 3. Any future construction projects within the proposed SGCP area and in proximity to a noise sensitive area would be required to conduct specific environmental review to ensure that the project is in compliance with the Glendale Municipal Code, particularly Section 8.36.080 for construction noise, and any required noise mitigation elements. Additionally, implementation of mitigation measure *MM 4.11-4* for the proposed project (discussed in Section 4.11.3) would also reduce this impact to a less than significant level under Alternative 3.

Similar to the proposed project, future development under Alternative 3 would result in potentially significant impacts associated with temporary increase in ambient noise levels; however, the impact would be reduced compared to the proposed project given the 28 percent and 9 percent fewer dwelling units anticipated under Alternative 3. Any future construction projects within the proposed SGCP area and in proximity to a noise sensitive area would be required to conduct specific environmental review to ensure that the project is in compliance with the Glendale Municipal Code, particularly Section 8.36.080 for construction noise, and any required noise mitigation elements. Additionally, implementation of mitigation measure *MM 4.11-5* for the proposed project (discussed in Section 4.11.3) would also reduce this impact to a less than significant level under Alternative 3.

### **Population/Housing**

The proposed project was determined to result in less than significant impacts associated with the displacement of housing and people, and significant and unavoidable impacts associated with inducement of population growth. As with the proposed project, although implementation of Alternative 3 does not

involve direct development, it allows for an increase of between 7,400 and 9,400 new dwelling units in the proposed SGCP area. This growth could exceed SCAGs forecasted growth of 8,700 dwelling units for the entire City (refer to Table 4.12-1). An increase of between 7,400 and 9,400 dwelling units would result in a population increase of approximately 19,980 and 25,380 people, respectively within the proposed SGCP area under Alternative 3; the increase is calculated using SCAG's 2017 Profile of the City 2.7 average persons per household. SCAG projects an increase in population of 20,800 residents within the City by 2040 (Table 4.12-1); therefore, the growth associated with Alternative 3 could exceed the projected growth for the entire City. As such, the growth associated with Alternative 3 is not accounted for in current regional planning documents (SCAG 2008 Regional Comprehensive Plan, SCAG 2016-2040 RTP/SCS, and SCAG Compass Growth Visioning Plan).

Similar to the proposed project, the impact associated with induced population growth under Alternative 3 is partly reduced due to the City's role in approving discretionary projects. However, this is a programmatic analysis and impacts are addressed under the assumed buildout year of 2040. Thus, as noted above, Alternative 3 would result in the inducement of substantial population growth within the proposed SGCP area, and there is no feasible mitigation to reduce the impact; therefore, this impact is considered significant and unavoidable.

### **Public Services**

The proposed project was determined to result in significant and unavoidable impacts associated with fire protection and police protection, and less than significant impacts to school and library services. Implementation of Alternative 3 would result in a population increase of between 19,980 and 25,380 people, and the total population in the SGCP area would increase from 122,318 to 127,718. Similar to the proposed project, the increase in population would create a need for fire protection services, police protection, schools and libraries.

Alternative 3 would contribute to the population growth and increasing demands for school services within the proposed SGCP area. To maintain acceptable service ratios, the construction of new or expanded school facilities may be required. In accordance with SB 50, at the time of building permit issuance, development projects are required to pay established school impact fees. Funding collected under SB 50 would reduce impacts to GUSD facilities, which serve the proposed SGCP area to a less than significant level. Implementation of Alternative 3 would also result in the potential for increased demand for library services within the proposed SGCP area, requiring the expansion and construction of new facilities. The addition of between 19,980 and 25,380 people residents (between 28 percent and 9 percent fewer residents when compared to the proposed project) would have adequate library services, as the citywide volume per resident ratio would be above the City standard similar to the proposed project. The impact of the proposed SGCP on library services would be less than significant. Under Alternative 3, as with development under the proposed project, any future development would be required to pay development fees that are collected by the City to support these public facilities that would help to reduce potential impacts; however, the impacts to schools and library services would be slightly less under Alternative 3 when compared to the proposed project given between 28 percent and 9 percent fewer residents anticipated under Alternative 3.

Similar to the proposed project, additional residents under Alternative 3 would create additional demand on the GFD, specifically for the three stations located within the proposed SGCP area: Fire Station 21, Fire Station 22, and Fire Station 25. Thus, the increase in population within the proposed SGCP area would have a potentially significant impact on fire protection services. The City does not have any

programs in place, which allows the collection of development impact fees to mitigate impacts to fire protection services, including the provision of new or physically altered fire facilities.

Similar to the proposed project, development under Alternative 3 would comply with all local, State, and federal regulations pertaining to fire protection. In addition, all discretionary projects are subject to environmental review and standard mitigation measures are applied as part of the conditions of approval for the project. The GFD's ability to maintain current workload/service levels would be reduced through a larger population requiring fire protection services. This is considered to be a significant and unavoidable impact. There is no feasible mitigation to reduce the impact; therefore, this impact is considered significant and unavoidable.

Likewise, Alternative 3 would contribute to population growth, increasing demands for police protection services. An increased population as permitted by Alternative 3 would exacerbate this deficiency; thus, the impact to police staffing levels is considered a significant and unavoidable impact. There is no feasible mitigation to reduce the impact; therefore, this impact is considered significant and unavoidable. However, the Alternative 3 would result in slightly reduced impacts to fire protection and police protection services when compared to the proposed project given between 28 percent and 9 percent fewer residents anticipated under Alternative 3.

## **Recreation**

The proposed project was determined to result in significant and unavoidable impacts associated with physical deterioration and the expansion of recreational facilities. As discussed in Section 4.12 (Population and Housing), implementation of the proposed SCGP would potentially result in a population increase of 27,910 people, which would bring the total population within the proposed SGCP area to 130,248 people. Applying the minimum NRPA standards of 6 acres per 1,000 residents to the City would require a total of approximately 781 acres of developed parkland. Presently, there is approximately 285 acres of developed parkland within the City, indicating a deficit of 496 acres. Future development under Alternative 3 would result in a population increase of between 19,980 and 25,380 people, and the total population in the SGCP area would increase from 122,318 to 127,718. Applying the minimum NRPA standards of 6 acres per 1,000 residents to the City would require a total of approximately 733 acres to 766 acres of developed parkland; indicating a deficit of between 448 and 481 acres (a decrease of between 48 and 15 acres when compared to the proposed project).

The City is planning for the development of a new recreation use along SR-134 that would comprise of 25 acres of recreational uses (i.e., Space 134). The 25-acre increase would bring the total parkland to 48.19 acres of parkland available to residents within the proposed SGCP area. The parkland ratio would increase to 0.47 acre of parkland per 1,000 persons, a 104 percent increase to the existing 0.23 acre per 1,000 persons.

Future development within the proposed SGCP area would be required to comply with the minimum NRPA and Quimby Act standards. Specifically, this requires that 6 acres of land for each 1,000 residents be devoted to local park and recreational purposes. This could be met through land dedication or payment of park fees, or a combination of both. While dedicated parkland directly increases the available recreation space within the City for residents, the payment of park fees from new development would be allocated to fund the acquisition and/or development of future parks or facility renovations associated with increased use of public facilities.

Adherence to existing applicable local regulations and implementation of the provisions in the Quimby Act would ensure that parks and open space are acquired, developed, improved, and expanded as future

residential projects are constructed. Similar to the proposed SGCP, Alternative 3 is not a physical project and does not directly create an impact; however, development resulting from future development anticipated under Alternative 3 would be subject to development impact fees in order to mitigate any potential impacts associated with parklands. Any open space, facilities or parks proposed for establishment at a later date would require separate environmental review under CEQA and development impact fees; however, Alternative 3 will remain deficient in parkland despite the increases in parkland acreages.

Therefore, similar to the proposed project, Alternative 3 could result in potentially significant and unavoidable direct impacts from the construction or expansion of recreational facilities. However, Alternative 3 would result in slightly reduced impacts to recreational facilities when compared to the proposed project given between 28 percent and 9 percent fewer residents anticipated under Alternative 3.

### **Traffic/Transportation**

The proposed project was determined to not result in an impact associated with air traffic patterns; Alternative 3 would not result in an impact associated with air traffic patterns.

The proposed project was determined to result in a less than significant impact associated with conflict with applicable plans, ordinances, and policies; hazards; and emergency access. Alternative 3 would not conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, as the growth associated with Alternative 3 is accounted for in the most recent adopted transportation plan (2016 RTP/SCS). Additionally, Alternative 3 would result in similar less than significant impacts associated with hazards and emergency as the proposed project. Alternative 3 does not propose the development of any roads, which may be hazardous, and the existing emergency access plans consider the growth and development associated with Alternative 3.

The Transportation Analysis prepared for the proposed SGCP (Fehr & Peers 2017), refer to Appendix F in this EIR, determined that the proposed project would result in significant and unavoidable impacts associated with LOS standards. Under existing conditions 7 intersections operate at LOS D or worse during the AM peak hour and 13 intersections operate at LOS D or worse during the PM peak hour. The operating conditions for Alternative 3 are the same as the proposed project: 19 intersections operating at LOS D or worse during the AM peak hour and 24 intersections operating at LOS D or worse during the PM peak hour. Similar to the proposed project, this impact would be significant and unavoidable.

Additionally, mainline freeway operating conditions analysis indicates four of the eight CMP freeway study locations are significantly impacted under Alternative 3; however, each of these locations already operates at LOS F under existing (2016) conditions as well as under the proposed project scenario. Alternative 3 would therefore result in similar significant and unavoidable impacts as the proposed project.

Implementation of fully feasible mitigation measures *MM 4.15-1* through *MM 4.15-5* for the proposed project (as discussed in Section 4.15.3) would reduce the impacts at the five associated intersections (Brand Boulevard & Glenoaks Boulevard, Glendale Avenue & Monterey Road, Harvey Drive & Wilson Avenue, Central Avenue & Colorado Street, and Central Avenue & Los Feliz Road) under Alternative 3 to a level below significant. The three dual-jurisdiction and mitigation measures (*MM 4.15-6* through *MM 4.15-8*) and two partially infeasible mitigation measures (*MM 4.15-9* through *MM 4.15-10*) for the proposed project (as discussed in Section 4.15.3) would reduce the impact at the associated intersections (Pacific Avenue & SR-134 WB Ramps, Pacific Avenue & SR-134 EB Ramps, SR-134 WB Ramps & Monterey Road, Central Avenue & Goode Avenue, and Verdugo Road & Broadway, respectively) under

Alternative 3; however, the mitigation measures would not reduce the impact to a level below significant. Therefore, similar to the proposed project, impacts to the remaining intersections listed in Table 4.15-9 cannot be mitigated, and the impacts would remain significant and unavoidable under Alternative 3.

### **Utilities/Service Systems**

The proposed project was determined to result in less than significant impacts associated with wastewater treatment requirements, wastewater treatment capacity, stormwater drainage facilities, water supplies, landfill capacity, solid waste regulations, and energy production or transmission facilities. Alternative 3, similar to the proposed project, would allow for increased land use intensity within the proposed SGCP area and would result in an increase in dwelling units and population. The increase in dwelling units and population within the proposed SGCP area would increase wastewater treatment demand, potentially increase the amount of runoff within the proposed SGCP area, increase demand for natural gas over existing conditions. All future projects under Alternative 3 would require environmental review to identify any potential impacts and present feasible mitigation measures to reduce the identified impacts. Therefore, future development anticipated under Alternative 3 would result in less than significant impacts associated with wastewater treatment requirements, wastewater treatment capacity, stormwater drainage facilities, water supplies, landfill capacity, solid waste regulations, and energy production or transmission facilities, but would be less when compared to the proposed project given between 28 percent and 9 percent fewer residents anticipated under Alternative 3.

### **■ Attainment of Project Objectives**

Development anticipated under Alternative 2 would result in an increase of between 7,400 and 9,400 dwelling units and between 19,980 and 25,380 residents when compared to an increase of 10,337 dwellings and 27,910 residents between 28 percent and 9 percent fewer residents under the proposed project scenario.

Alternative 3 would meet most of the objectives identified for the proposed project (refer to Section 6.1 above) in that it would allow for land uses consistent with the existing character of the City and continue to provide sufficient infrastructure to meet demand. However, Alternative 3 would not fully meet the proposed project objectives that will act as a catalyst to move the City into the coming decades, because the majority of future development under Alternative 3 would be focused around Metro's 780/180/181 route along East Broadway to Central Avenue. Further, zoning standards outside of the above-mentioned planning areas (i.e., new mixed-use zoning standards for properties fronting East Broadway and South Central Avenue; up-zone the multi-family blocks parallel to these two corridors as an "affordable housing overlay zone; a similar re-zoning along East Colorado Street under the premise that Metro would route its planned east-west Pasadena-NoHo Bus Rapid Transit route along Colorado-Central-Glenoaks; and selected down and/or re-zoning on West Broadway, which does not have the same frequency of transit service as East Broadway) would remain the same. Additionally, the exact mechanisms of how an "affordable housing overlay zone" would be implemented have yet to be established; although, the City could explore such options as, inclusionary housing requirements; additional zoning incentives for affordable housing beyond SB 1818; and potential financial incentives for affordable housing.

While Alternative 3 will not generally result in impacts with a different level of significance when compared to the proposed project, Alternative 3 will not fulfill the objectives identified for the proposed SGCP.

## 6.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA Guidelines require that an additional alternative be chosen as the Environmentally Superior Alternative from among the remaining alternatives. This would ideally be the alternative that eliminates or lessens significant and unavoidable impacts. Implementation of the proposed SGCP would result in the significant and unavoidable project-related and/or cumulative impacts to the following resources: Aesthetics, Air Quality, Greenhouse Gas Emissions, Population and Housing, Public Services, Recreation, and Transportation and Traffic. Thus, the environmentally superior alternative is the No Project Alternative. However, Section 15126.6(e)(2) of the CEQA Guidelines states that if the environmentally superior alternative is the No Project Alternative, the EIR shall identify an Environmentally Superior Alternative among the other alternatives. Alternative 2, Downtown/Tropico Center Plan, would result in the greatest reduction of environmental impacts when compared to the proposed project and would be the Environmentally Superior Alternative. Table 6-1 provides a side-by-side comparison of impacts of the proposed project alternatives and No Project Alternative.

**Table 6 1 Comparison of Proposed Project Alternatives and No Project Alternative**

<i>Issue Areas</i>	<i>Proposed Project With Mitigation</i>	<i>Alternative 2 Environmentally Superior</i>	<i>Alternative 3</i>	<i>No Project Alternative</i>
<b>2.1 Aesthetics</b>				
Scenic Vistas	EFNS	—	—	—
Scenic Resources	LTS	▼	▼	▼
Lighting and Glare	LTS	▼	▼	▼
Visual Character or Quality	SU	▼	▼	▼
New Sources of Shade	SU	▼	▼	▼
<b>2.2 Air Quality</b>				
Air Quality Plans	SU	▼	▼	▼
Air Quality Violations	SU	▼	▼	▼
Non-attainment of Criteria Pollutants	SU	▼	▼	▼
Sensitive Receptors	SU	▼	▼	▼
Objectionable Odors	LTS	▼	▼	▼
<b>2.3 Biological Resources</b>				
Riparian Habitat and Other Sensitive Natural Communities	EFNS	—	—	—
Wildlife Movement Corridors and Nursery Sites	EFNS	—	—	—
Habitat Conservation Plans and Natural Community Conservation Plans	EFNS	—	—	—
Federally Protected Wetlands	LTS	▼	▼	▼
Local Policies and Ordinances	LTS	▼	▼	▼
Special Status Plant and Wildlife Species	LTS	▼	▼	▼
Migratory Birds	LTS	▼	▼	▼
<b>2.4 Cultural and Paleontological Resources</b>				
Historical Resources	LTS	▼	▼	▼
Archaeological Resources	LTS	▼	▼	▼
Paleontological Resources	LTS	▼	▼	▼
Human Remains	LTS	▼	▼	▼
Tribal Cultural Resources	LTS	▼	▼	▼

**Table 6 1 Comparison of Proposed Project Alternatives and No Project Alternative**

<i>Issue Areas</i>	<i>Proposed Project With Mitigation</i>	<i>Alternative 2 Environmentally Superior</i>	<i>Alternative 3</i>	<i>No Project Alternative</i>
<b>2.5 Geology and Soils</b>				
Waste Water Disposal Systems	EFNS	—	—	—
Exposure to Seismic Related Hazards	LTS	▼	▼	▼
Soil Erosion or Topsoil Loss	LTS	▼	▼	▼
Soil Stability	LTS	▼	▼	▼
Expansive Soils	LTS	▼	▼	▼
<b>2.6 Greenhouse Gas Emissions</b>				
Generation of Greenhouse Gas Emissions Conflict with Applicable Plan, Policy, or Regulation	SU	▼	▼	▼
<b>2.7 Hazards and Hazardous Materials</b>				
Public Airport	EFNS	—	—	—
Private Airstrip	EFNS	—	—	—
Transport, Use, and Disposal of Hazardous Materials	LTS	▼	▼	▼
Accidental Release of Hazardous Materials	LTS	▼	▼	▼
Hazards to Schools	LTS	▼	▼	▼
Existing Hazardous Materials Sites	LTS	▼	▼	▼
Emergency Response and Evacuation Plans	LTS	▼	▼	▼
Wildland Fires	LTS	▼	▼	▼
<b>2.8 Hydrology and Water Quality</b>				
Housing within a 100-year Flood Hazard Area	EFNS	—	—	—
Impeding or Redirecting Flood Flows	EFNS	—	—	—
Water Quality Standards and Requirements	LTS	▼	▼	▼
Groundwater Supplies and Recharge	LTS	▼	▼	▼
Erosion or Siltation	LTS	▼	▼	▼
Flooding	LTS	▼	▼	▼
Exceed Capacity of Stormwater Systems	LTS	▼	▼	▼
Dam Inundation and Flood Hazards	LTS	▼	▼	▼
Seiche, Tsunami, and Mudflow Hazards	LTS	▼	▼	▼
<b>2.9 Land Use</b>				
Physical Division of an Established Community	EFNS	—	—	—
Conflicts with HCPs or NCCPs	EFNS	—	—	—
Conflicts with Land Use Plans, Policies, and Regulations	LTS	—	—	▼
<b>2.10 Mineral Resources</b>				
Mineral Resource Availability	LTS	▼	▼	▼
Mineral Resource Recovery Sites	LTS	▼	▼	▼
<b>2.11 Noise</b>				
Excessive Noise Exposure from a Public Airport	EFNS	—	—	—
Excessive Noise Exposure from a Private Airport	EFNS	—	—	—
Permanent Increase in Ambient Noise Levels	LTS	▼	▼	▼
Excessive Noise Levels	LTS	▼	▼	▼
Excessive Groundborne Vibration	LTS	▼	▼	▼
Temporary Increase in Ambient Noise Levels	LTS	▼	▼	▼

**Table 6 1 Comparison of Proposed Project Alternatives and No Project Alternative**

<i>Issue Areas</i>	<i>Proposed Project With Mitigation</i>	<i>Alternative 2 Environmentally Superior</i>	<i>Alternative 3</i>	<i>No Project Alternative</i>
<b>2.12 Population and Housing</b>				
Displacement of Housing or People	LTS	▼	▼	▼
Population Growth	SU	▼	—	▼
<b>2.13 Public Services</b>				
School Services	LTS	▼	▼	▼
Library Services	LTS	▼	▼	▼
Fire Protection Services	SU	▼	▼	▼
Police Protection Services	SU	▼	▼	▼
<b>2.14 Recreation</b>				
Construction of New Recreational Facilities	SU	▼	▼	▼
Deterioration of Parks and Recreational Facilities	SU	▼	▼	▼
<b>2.15 Transportation and Traffic</b>				
Air Traffic Patterns	EFNS	—	—	—
Road Safety	LTS	▼	▼	▼
Emergency Access	LTS	▼	▼	▼
Circulation System	LTS	▼	▼	▼
Alternative Transportation	LTS	▼	▼	▼
Traffic and Level of Service Standards	SU	—	—	▼
<b>2.16 Utilities and Service Systems</b>				
Wastewater Treatment Requirements	LTS	▼	▼	▼
New Water or Wastewater Treatment Facilities	LTS	▼	▼	▼
Sufficient Stormwater Drainage Facilities	LTS	▼	▼	▼
Adequate Water Supplies	LTS	▼	▼	▼
Adequate Wastewater Facilities	LTS	▼	▼	▼
Sufficient Landfill Capacity	LTS	▼	▼	▼
Solid Waste Regulations	LTS	▼	▼	▼
Energy	LTS	▼	▼	▼

- ▲ Alternative is likely to result in greater impacts to issue when compared to proposed project
- Alternative is likely to result in a similar impact to issue when compared to proposed project
- ▼ Alternative is likely to result in less impacts to issue when compared to proposed project
- EFNS Effects Found Not Significant
- PS Potentially Significant
- LTS Less than Significant
- SU Significant and Unavoidable