

D. PROJECT ALTERNATIVES

INTRODUCTION

Per CEQA Section 15126.6, an EIR shall describe and analyze a range of potential alternatives to the proposed Project. Per Section 15126.6(a), "...an EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives...it must consider a reasonable range of potentially feasible alternatives that will foster informed decisionmaking and public participation. An EIR is not required to consider alternatives which are infeasible. The Lead Agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternative. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason."

CEQA Section 15126.6(c) sets forth guidelines for the selection of a range of reasonable alternatives. "The range of potential alternatives to the proposed Project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination."

As part of the alternative analysis, per CEQA Section 15126.6(e), the EIR must evaluate the No Project Alternative. The purpose of describing and analyzing a no project alternative is to allow decisionmakers to compare the impacts of approving the proposed Project with the impacts of not approving the proposed Project. The No Project Alternative should analyze the impacts that would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.

As a result of the selection and analysis of project alternatives, an environmentally superior alternative must be designated. If the environmentally superior alternative is the No Project Alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.

ALTERNATIVES CONSIDERED BUT REJECTED

Public Facilities - Police Substation. CEQA Guidelines require that, "An EIR shall describe a range of reasonable alternatives to the project...which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project...".

One of two significant environmental impacts identified in the proposed Project analysis was to police protection services. To reduce potential impacts to police protection services, an alternative that considered the construction of a new a police Substation or Area Station in the project area was considered. In addition to trying to reduce potential Project impacts, the LAPD had indicated that they are seeking to locate an additional station in the southwest portion of the San Fernando Valley.¹⁸ This alternative was proposed to the LAPD but was determined to be an impractical location for a new Area Station due to its close proximity to the existing Devonshire Area Station (about 3 miles).¹⁹ Construction of a new police substation was also dismissed as impractical by the LAPD due to lack of staffing and equipment budgets.²⁰

ALTERNATIVES CONSIDERED

Alternatives analyzed in addition to the proposed Project include:

1. No Project Alternative
2. All Residential Alternative
3. Reduced Project Alternative
4. Alternative Project Site Alternative (similar project scope)

An expanded discussion of Alternatives Considered is provided in **Section VII: Alternatives** of this document.

1. No Project Alternative

Currently, the proposed Project Site is developed with approximately 310,000 square feet of office space, approximately 12,000 square feet of manufacturing space, and approximately 4,000 square feet of storage space. Under the No Project Alternative, it was assumed that no changes to the Project Site would occur and that existing development would remain on Site, condition unchanged. However, consistent with current plans for the Project Site, the previously approved Homeplace Retirement Community would be constructed as planned. It was also assumed that properties within the Add Area would not be redeveloped under the No Project Alternative.

The main building at the facility is currently occupied by Litton Guidance and Control Systems. Their lease on the building and property extends until 2005 at which time it is the intent of Litton Industries to vacate the property and move operations elsewhere. The applicant has made the following attempts to identify a future user of the property with the same intended land use:

¹⁸Email between Maya Zaitzevsky, LADCP Environmental Review Section, and Yvette Sanchez-Owens, LAPD, February 12, 2003.

¹⁹Email between Maya Zaitzevsky, LADCP Environmental Review Section, and Joanne Ma, LAPD, February 14, 2003.

²⁰Email between Maya Zaitzevsky, LADCP Environmental Review Section, and Yvette Sanchez-Owens, LAPD, February 12, 2003.

- Northrop Grumman, the parent company of Litton Industries, has attempted through their industry network to identify another user for the Project Site.
- CRESA Partners, a well respected brokerage firm in the project area, has been actively marketing the site through several methods trying to find a replacement tenant including large marketing signs on site, cold calling potential users for the site, networking throughout the brokerage community, flyers, and listing the site on websites of the most widely used for listing commercial real estate.
- Through word of mouth and corporate connections, the applicant has put word out that the space is available for lease and has attempted to contact specific development opportunities for this site.

However, due to current market forces within the San Fernando Valley, the applicant has been unable to identify a future industrial tenant for the Project Site. Therefore, the No Project Alternative would result in vacation of the Project Site by the current tenant and existing buildings would be left unoccupied. Empty buildings can result in blight for the project area.

The Add Area is currently comprised of approximately fifteen individual parcels, all of which are currently developed. However, the Add Area properties are not currently under the applicant's control and each property has a separate owner. Therefore, it was assumed that none of the Add Area properties would be redeveloped under the No Project Alternative.

This alternative satisfies the CEQA requirement for a No Project Alternative comparison.

2. All Residential Alternative

The All Residential Alternative would include replacement of existing development on the Project Site and Add Area with multifamily residential units. As previously approved, the Homeplace Retirement Community would be constructed on an approximately eight acre parcel of the Project Site, located at the southeastern corner of the Corbin Avenue and Prairie Street.

In accordance with the requested Zone Change from MR2-1, [T][Q]M1-1, and P-1 to C2-1, the C2-1 Zone permits one dwelling unit per 400 square feet. Based on this allowance, the All Residential Alternative at the Project Site would include a maximum of 2,994 dwelling units in addition to the Homeplace Retirement facility (389 independent senior living units, 35 assisted living units). The All Residential Alternative would include a maximum 1,666 dwelling units on the Add Area properties. Overall, the All Residential Alternative would result in the construction of approximately 4,660 dwelling units, 389 senior housing units, and 35 assisted living units.

It should be noted that the All Residential Alternative could also be accomplished under a General Plan Amendment to High Medium Residential and a consistent Zone Change to R4.

All service and utility providers for the All Residential Alternative will be similar to those of the proposed Project.

Due to the existing industrial use of the Project Site and Add Area and the commercial use proposed under the Project, an All Residential Alternative was determined to be a reasonable alternative use of the Project Site and Add Area.

3. Reduced Project Alternative

Under the Reduced Project Alternative, existing development at the Project Site and Add Area would be replaced by a project approximately one third the size of the proposed Project. The Reduced Project Alternative would include approximately 371,250 square feet of office space, approximately 132 condominium units, and a senior housing facility consisting of approximately 128 independent living units and 11 senior housing units.

The Reduced Project Alternative is based on the need to reduce air quality impacts anticipated from the proposed Project. This Alternative assumes that, as with the proposed Project, both the Project Site and Add Area would be redeveloped. Selection of a development scenario was based on reducing the proposed Project to a size that would not exceed the SCAQMD thresholds for air quality. Based on an air quality analysis prepared for the proposed Project, it was determined that to reduce the air quality impacts of the least significant development scenario below the established thresholds, the project must be reduced by approximately 67 percent. In effect, the Reduced Project Alternative is one third the size of the proposed Project. It is assumed under the Reduced Project Alternative that the Homeplace Retirement facility would be developed but would be reduced in size as well.

All service and utility providers for the Reduced Project Alternative will be similar to those of the proposed Project.

4. Alternative Project Site Alternative

Under the Alternative Project Site alternative, includes analysis of a project similar in scope to the proposed Project but located at an Alternative Project Site. As discussed in Section VII of this document, due to similarities between the Alternative Project Site and the Project Site/Add Area and the feasibility of constructing a project similar in scope to the proposed Project on this site, the Alternative Project Site alternative was determined appropriate for further analysis.

The Alternative Project Site alternative would not include construction of the Homeplace Retirement facility. All potential impacts are assumed to be the worst-case scenario.

5. Environmentally Superior Alternative

CEQA Section 15126.6 requires the selection of an environmentally superior alternative to the proposed Project. Although the No Project Alternative must be analyzed, if the environmentally superior alternative is the No Project Alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives. Generally, the environmentally superior alternative is that which is considered to result in the generation of the least significant environmental impacts. In this instance, the Reduced Project Alternative would be considered the environmentally superior alternative. The proposed Project is anticipated to result in two significant impacts: operational air quality and police protection services. The Reduced Project Alternative would reduce to a less than significant level the operational air quality impact anticipated from the proposed Project and would result in a significant impact to only police protection services. Therefore, the Reduced Project Alternative would result in only one significant environmental impact which is police protection services.