

VII. 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."

Per CEQA Section 15126.6(b), the purpose of the alternative analysis is to "...identify ways to mitigate or avoid the significant effects that a project may have on the environment, the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly."

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... Among the factors that may be used to eliminate alternatives from detailed consideration in the EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts."

The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project, per CEQA Section 15126.6(d). 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.

The range of alternatives required in an EIR is governed by a “rule of reason” that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. Among factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site. No one of these factors establishes a fixed limit on the scope of reasonable alternatives (*Citizens of Goleta Valley v. Board of Supervisors* (1990)).”

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 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.¹¹⁸ 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).¹¹⁹ Construction of a new police substation was also dismissed as impractical by the LAPD due to lack of staffing and equipment budgets.¹²⁰

¹¹⁸Email between Maya Zaitzevsky, LADCP Environmental Review Section, and Yvette Sanchez-Owens, LAPD, February 12, 2003.

¹¹⁹Email between Maya Zaitzevsky, LADCP Environmental Review Section, and Joanne Ma, LAPD, February 14, 2003.

¹²⁰Email between Maya Zaitzevsky, LADCP Environmental Review Section, and Yvette Sanchez-Owens, LAPD, February 12, 2003.

ALTERNATIVES CONSIDERED

Alternatives analyzed in addition to the proposed Project include:

- No Project Alternative
- All Residential Alternative
- Reduced Project Alternative
- Alternative Project Site with similar project

Discussion of the Alternatives Considered is provided in the following sections. A comparison of the environmental impacts anticipated from the proposed Project and project Alternative is provided in **Table 131: Impact Comparison**.

A. NO PROJECT ALTERNATIVE

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. In the case at hand, the No Project Alternative assumes that no changes to the Project Site and Add Area would occur, 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.

Currently, the 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. The main building at the facility is currently occupied by Litton Guidance and Control Systems. It is the occupant's intent to vacate the property upon termination of their lease in 2005, if not sooner, at which time the occupant will move operations elsewhere. The applicant has made the following attempts to identify a future user of the property that would continue the existing land use:

- Northrop Grumman, the parent company of Litton Industries, has attempted through their industry network to identify another user for the Project Site.

TABLE 131
IMPACT COMPARISON

Environmental Impact Section	Proposed Project	No Project Alternative	All Residential Alternative	Reduced Project Alternative	Alternative Project Site Alternative
Aesthetics	LTS	S/G	LTS/R	LTS/R	LTS/S
Air Quality Construction Operational	LTS S	LTS/LT LTS/LT	LTS/S S/G	LTS/R LTS/R	LTS/R LTS/R
Biological Resources	LTS	LTS/S	LTS/S	LTS/S	LTS/S
Geologic Hazards	LTS	LTS/S	LTS/S	LTS/S	LTS/S
Hazardous Materials	LTS	LTS/S	LTS/S	LTS/S	LTS/S
Hydrology	LTS	LTS/R	LTS/G	LTS/S	LTS/S
Land Use	LTS	LTS/S	LTS/S	LTS/S	LTS/S
Noise	LTS	LTS/R	LTS/G	LTS/R	LTS/R
Population & Housing	LTS	LTS/R	LTS/G	LTS/R	LTS/S
Employment	LTS	S/G	S/G	LTS/R	LTS/S
Public Services Fire Police Libraries Schools	LTS S LTS LTS	LTS/S LTS/R LTS/R LTS/R	LTS/S S/G LTS/G S/G	LTS/S S/R LTS/R LTS/R	LTS/S S/S LTS/S LTS/S
Recreational Facilities	LTS	LTS/S	LTS/G	LTS/R	LTS/R
Traffic	LTS	LTS/R		LTS/R	LTS/R
Utilities Electricity Natural Gas Water Sewers Solid Waste	LTS LTS LTS LTS LTS	LTS/R LTS/R LTS/R LTS/R LTS/R	LTS/G LTS/G LTS/G LTS/G LTS/G	LTS/R LTS/R LTS/R LTS/R LTS/R	LTS/R LTS/R LTS/G LTS/R LTS/R
LTS = Less than significant S = Significant LTS/R = Less than significant, Reduced impact compared to proposed Project LTS/G = Less than significant, Greater impact compared to proposed Project LTS/S = Less than significant, Similar impacts as proposed Project					

- 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.

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. The No Project Alternative would result in vacation of the Project Site by the current tenant and existing buildings would be left unoccupied. Vacant buildings can result in blight for the surrounding project area.

The Add Area is currently comprised of approximately fifteen individual parcels, all of which are developed. All of the Add Area properties currently have separate owners. It is unclear if properties within the would be redeveloped under the No Project Alternative however, it has been assumed that properties would not be redeveloped under the No Project Alternative.

Following is a discussion of environmental impacts anticipated as a result of the No Project Alternative.

1. Aesthetics

The No Project Alternative would result in vacation of existing one- to three-story commercial and industrial buildings on the Project Site. These buildings would remain on Site, condition unchanged. While the remainder of the Project Site would be vacated, the approved Homeplace Retirement facility would be developed. The Homeplace facility will be a maximum of four-stories in height and will therefore not restrict views of or from the Project Site. As determined in the Proposed Project, due to the developed, commercial and industrial nature of the project area, the Homeplace development will not alter the existing visual character of the project area.

Vacation of existing buildings on the Project Site could result in a source of blight for the project area which would result in a significant impact to the visual character of the project area. Therefore, the No Project Alternative would result in a significant impact to aesthetics.

2. Air Quality

Air emissions in the project area are contributed to by two sources: mobile sources (vehicular) and stationary sources. Due to the developed commercial nature of the project area, vehicular exhaust is the primary source of air emissions. The No Project Alternative would result in

vacation of existing one- to three-story commercial and industrial buildings on the Project Site. These buildings would remain on Site, condition unchanged. As a result, trip generation at the Project Site will decrease. Due to a reduction in trip generation at the Project Site under the No Project Alternative, air quality impacts will be less than those anticipated for the proposed project. Therefore, the No Project Alternative would result in a less than significant impact to air quality.

3. Biological Resources

Due to the urban nature of the project area, vegetation on the Project Site is limited to landscaped grassy areas, street trees, and a stand of citrus trees located at the southwestern corner of the Project Site. Under the No Project Alternative, the stand of citrus trees, as well as the remainder of landscaping on the Project Site, would be retained. Additionally, under the No Project Alternative, the Homeplace Retirement Community would be constructed, as previously approved. The portion of the Project Site upon which the Homeplace facility will be constructed is currently vacant and void of vegetation. Landscaping will be provided throughout this development. Therefore, the No Project Alternative would result in a less than significant impact to biological resources.

4. Geologic Hazards

The No Project Alternative would likely result in vacation of the existing buildings on the Project Site. Therefore, geologic hazards would be similar to those under the proposed Project.

Under the No Project Alternative, the Homeplace facility will be constructed. The northern portion of the Project Site upon which Homeplace will be constructed, is not located within a designated area of liquefaction hazard; however, the southern portion of the Project Site is located within a designated area of liquefaction hazard. Due to the Site location within a liquefaction zone, a building-specific liquefaction evaluation will be required for the Site to evaluate the anticipated magnitude of liquefaction-induced settlement and to provide foundation recommendations to mitigate adverse effects from liquefaction. With further study and mitigation measures, as with the proposed project, a significant geologic hazard impact is not anticipated due to the location of a portion of the Project Site within a liquefaction zone.

The Project Site is not located within a currently established Alquist-Priolo Earthquake Fault Zone, therefore, the potential for surface rupture at the Site due to fault plane displacement is considered low. However, the Project Site could be subjected to strong ground shaking in the event of an earthquake, a hazard common in Southern California. Any potential effects of ground shaking can be mitigated by proper engineering design and construction in conformance with current building codes and engineering practices. Therefore, a significant geologic hazard impact is not anticipated due to the location of the Project Site within an area of potential strong ground shaking.

5. Hazardous Materials and Waste

The No Project Alternative will include vacation of existing buildings at the Project Site. The rate of use, transport, and disposal of hazardous waste at the Site would likely decrease as a result of the termination of industrial operations. However, due to the age and type of buildings existing on the Project Site, it is likely that asbestos and lead paint may be located within the buildings. If the buildings are left vacant and idle, the opportunity for asbestos containing materials and lead paint residue to be spread outside the existing buildings is unlikely. Similar to the proposed project however, if redevelopment of existing buildings on the Project Site were to occur in the future, proper stabilization and removal of such materials must occur prior to demolition. Therefore, as with the proposed project, the No Project Alternative would result in a less than significant hazardous materials impact.

6. Hydrology

The No Project Alternative would result in vacation of existing buildings on the Project Site which would not substantially alter hydrology at the Site. Under the No Project Alternative, a small stand of citrus trees located at the southwestern corner of the Project Site would be retained. Retention of this stand would reduce runoff from the Site by an unsubstantial 1 cfs of water, or 0.4 percent of the existing runoff, as compared to the proposed Project.

Existing storm drains along Shirley Avenue north of Teledyne Way are undersized and do not fully convey a 10 year storm event. Runoff from the Project Site currently travels via sheet flow eastward along Teledyne Way to Shirley Avenue where it is conveyed southward along the Shirley Avenue street section to catch basins located at the intersection of Nordhoff Street and Shirley Avenue. Due to the developed nature of the Project Site, the existing undersized storm drain conditions would not be altered by the No Project Alternative and impacts would be similar to those of the proposed Project.

Under the No Project Alternative, construction of the Homeplace Retirement facility would take place. This project includes installation of a private storm drain to control runoff from the currently vacant Homeplace parcel. Assuming the Homeplace Retirement facility is developed independently of the vacation of existing buildings on the Project Site, construction of this control mechanism would occur. If, for some reason, the Homeplace development does not occur, construction of this control mechanism and the construction of any other on-site control features may not occur. However, as with the proposed project, due to the existing developed nature of the Project Site, the No Project Alternative would result in a less than significant impact to hydrology.

7. Land Use

The No Project Alternative will result in continuation of the existing zoning and General Plan designation across the Project Site. Therefore, although the Site may become underutilized, the No Project Alternative will result in a less than significant land use impact.

8. Noise

Due to the developed nature of the project area, vehicular traffic is the primary source of noise in the area. Sensitive receptors to noise impacts in the area have been identified as:

- Residential uses (Plummer Street and Corbin Avenue)
- Washington Mutual Child Care Center

The No Project Alternative would result in vacation of existing buildings on the Project Site. As a result of the Site vacancy, trip generation at the Project Site would decrease by approximately 2,802 daily trips.

Under the No Project Alternative, the approved Homeplace Retirement facility would be constructed. This development would increase trip generation at the Project Site by approximately 1,429 daily trips. Due to the vacation of the remainder of the Site, with this increase the total number of trips at the Project Site would be reduced overall by approximately 1,373 daily trips. This would reduce noise impacts at the Project Site and at the identified sensitive receptors. Therefore, as with the proposed project, the No Project Alternative would result in a less than significant noise impact.

9. Population

The No Project Alternative would likely include vacation of existing buildings on the Project Site. The No Project Alternative would include construction of the approved Homeplace Retirement facility. As a result, the No Project Alternative could result in an increase of approximately 797 residents at the Project Site. However, the potential increase in residents resulting from the Homeplace facility will not exceed population estimates for this area provided by the Los Angeles Citywide General Plan Framework EIR. Therefore, the No Project Alternative would result in a less than significant impact to population.

10. Employment

The No Project Alternative at the Project Site would result in vacation of existing buildings on the Project Site. Vacation by the current tenant would eliminate approximately 1,000 jobs currently located on the Project Site.

Operation of the Homeplace Retirement facility would increase jobs at the Project Site by approximately 195 jobs. This would result in a net loss of approximately 805 jobs at the Project Site. Therefore, the No Project Alternative could result in a significant impact to employment.

11. Fire Protection

The No Project Alternative would result in vacation of existing buildings at the Project Site. Additionally, the Homeplace Retirement facility would be constructed. Based on a fire protection analysis conducted by the LADWP for the proposed project (which included the Homeplace facility), existing fire flow at public hydrants would be adequate to serve the proposed project at the Project Site with incorporation of mitigation measures. Therefore, under the No Project Alternative at the Project Site, the Project Site would have adequate fire protection and the No Project Alternative would result in a less than significant impact to fire protection services.

12. Police Protection

The No Project Alternative includes vacation of existing buildings at the Project Site. This will reduce the employee population at the Project Site by approximately 1,000 employees. There is no residential population currently.

Under the No Project Alternative, construction of the Homeplace Retirement facility would occur which could introduce approximately 797 new residents and approximately 195 employees to the Site. Based on vacation of the remainder of the Site, this increase would result in a net loss of approximately eight people at the Project Site. Therefore, the No Project Alternative would result in a less than significant impact to police protection services.

13. Libraries

The No Project Alternative includes vacation of existing buildings at the Project Site. This will reduce the population at the Site by approximately 1,000 people, currently employees. There is no residential population currently.

Under the No Project Alternative, construction of the Homeplace Retirement facility would occur which could introduce approximately 797 new residents and approximately 195 employees to the Site. Based on vacation of the remainder of the Site, this increase would result in a net loss of approximately eight people at the Project Site. Additionally, Homeplace will provide library services for the use of their residents. Therefore, as with the proposed project, the No Project Alternative will result in a less than significant impact to library services.

14. Schools

The No Project Alternative includes vacation of existing buildings at the Project Site. There is no residential population at the Project Site currently, therefore, the vacation will not reduce the number of school aged children in the project area.

Under the No Project Alternative, construction of the Homeplace Retirement facility would occur which could introduce approximately 797 new residents and approximately 195 employees to the Site. Based on vacation of the remainder of the Site, this increase would result in a net loss of approximately eight people at the Project Site. The Homeplace facility is intended for seniors who require daily medical and living assistance and therefore, will not generate school-aged children. Therefore, the No Project Alternative will not result in a significant impact to schools.

15. Recreation

The No Project Alternative includes vacation of existing buildings at the Project Site. There is no residential population at the Project Site currently.

Under the No Project Alternative, construction of the Homeplace Retirement facility would occur which could introduce approximately 797 new residents and approximately 195 employees to the Site. Based on vacation of the remainder of the Site, this increase would result in a net loss of approximately eight people at the Project Site which will reduce any impact to recreational facilities. As with the proposed project, due to the acreage of parkland available throughout the Community Plan Area and the number of active recreational facilities available in the project area, the No Project Alternative at the Project Site will result in a less than significant impact to parkland or recreational facilities.

16. Traffic

The No Project Alternative includes vacation of existing buildings at the Project Site which will reduce trip generation in the project area by approximately 2,802 daily trips. Construction of the Homeplace Retirement facility is anticipated to generate approximately 1,429 daily trips which will result in a net reduction of 1,373 daily trips at the Project Site. Therefore, the No Project Alternative would result in a less than significant impact to traffic.

17. Electricity

The No Project Alternative includes vacation of existing buildings at the Project Site. This could reduce electricity demand in the project area by a maximum of approximately 4,162,625 kWh annually.

Under the No Project Alternative, construction of the Homeplace Retirement facility would occur. This construction would result in an electricity demand of approximately 2,385,637 kWh annually which is a net reduction of approximately 1,776,988 kWh annually. Further, the Homeplace facility was included in the electricity demand analysis approved by the LADWP for the proposed project. Therefore, the No Project Alternative would result in a less than significant impact to electricity provision services.

18. Natural Gas

The No Project Alternative includes vacation of existing buildings at the Project Site. This could reduce natural gas demand in the project area by a maximum of approximately 669,085 cubic feet monthly.

Under the No Project Alternative, construction of the Homeplace Retirement facility would occur. This construction would result in a natural gas demand of approximately 1,700,877 cubic feet monthly which is a net reduction of approximately 1,031,792 cubic feet monthly. The Homeplace facility was included in the natural gas analysis approved by The Gas Company for the proposed project. Therefore, the No Project Alternative would result in a less than significant impact to natural gas provision.

19. Water

The No Project Alternative includes vacation of existing buildings at the Project Site. This could reduce water demand in the project area by a maximum of approximately 68,251 gallons per day.

Under the No Project Alternative, construction of the Homeplace Retirement facility would occur. This construction would result in a water demand of approximately 49,305 gallons per day which is a net reduction of approximately 18,946 gallons per day of water. The Homeplace facility was included in the water demand analysis approved by LADWP for the proposed project. Therefore, the No Project Alternative would result in a less than significant impact to water supply.

20. Sewers

The No Project Alternative includes vacation of existing buildings at the Project Site. This could reduce sewage generation in the project area by a maximum of approximately 63,345 gallons per day.

Under the No Project Alternative, construction of the Homeplace Retirement facility would occur. This construction would result in a sewage generation of approximately 61,325 gallons per day which is a net reduction of approximately 2,020 gallons per day of sewage. The Homeplace facility was included in the sewer analysis conducted by LADPW for the proposed project.

According to the LADPW, Bureau of Engineering, existing sewers in Corbin Avenue and Nordhoff Street have adequate capacity to serve the No Project Alternative conditions. Therefore, the No Project Alternative would result in a less than significant impact to sewers.

21. Solid Waste

The No Project Alternative includes vacation of existing buildings at the Project Site. This could reduce solid waste generation in the project area by approximately 1.3 tons per day.

Construction of the Homeplace facility would result in the disposal of approximately 1,717 tons. Any waste generated from the construction phase would be temporary in nature and would not result in long-term disposal of waste. Operation of the Homeplace facility would produce approximately .95 tons of solid waste per day which is a net reduction of approximately .35 tons of solid waste per day at the Project Site. Therefore, the No Project Alternative would result in a less than significant impact to solid waste generation.