
V. ALTERNATIVES

A. INTRODUCTION

CEQA requires that an EIR describe a reasonable range of alternatives to the project, or to the location of the project that could feasibly avoid or lessen significant environmental impacts while substantially attaining the basic objectives of the project. An EIR should also evaluate the comparative merits of the alternatives. This section sets forth potential alternatives to the proposed Project and evaluates them, as required by CEQA.

Key provisions of the CEQA Guidelines (Section 15126.6) pertaining to the alternatives analysis 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 of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.
- The no project alternative shall be evaluated along with its impact. The no project analysis shall discuss the existing conditions at the time the notice of preparation is published, as well as what would be reasonably 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”; therefore, the EIR must evaluate only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project.
- For alternative locations, only locations that would avoid or substantially lessen any of the significant effects of the project 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.
- Based on the alternatives analysis, CEQA requires that an environmentally superior alternative be designated. If the environmentally superior alternative is the No Project Alternative, then the EIR is required to identify an environmentally superior alternative among the other alternatives.

- In addition, CEQA requires that an EIR identify any alternatives that were considered for analysis but rejected as infeasible. Such potential alternatives are described below.

The range of alternatives discussed in an EIR is governed by the “rule of reason,” mentioned above, that requires the identification of only those alternatives necessary to permit a reasoned choice between the alternatives and the proposed Project. The range of feasible alternatives is 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 Section 15126.6(f)(1)) are site suitability, economic viability, availability of infrastructure, general plan consistency, regulatory limitations, jurisdictional boundaries, and whether the proponent could reasonably acquire, control, or otherwise have access to the alternative site. An EIR need not consider an alternative if its effects cannot be reasonably identified, its implementation is remote or speculative, or if it would not achieve the basic project objectives.

The alternatives analyzed below have been selected to address the Project’s significant impacts: the significant NOx emissions during construction and the significant street segment impact on Pico Street. The No Project Alternative, required by CEQA, shows how the proposed Project’s impacts would be avoided with no material change in the uses and conditions on the site. The second alternative analyzed, the Reduced Density Alternative presents a means of reducing impacts by reducing the size of the project. The Medical Office/Commercial Use Alternative does not reduce impacts but has been analyzed to inform the decision-making process by showing the environmental consequences of a different mix of uses on the site that could occur in conformance with applicable plans and regulations if the proposed Project were not to proceed.

B. PROJECT OBJECTIVES

As discussed in Section II, Project Description, the Applicant would be required to complete the following actions to implement the proposed Project: (1) Minor Conditional Use Permit (CUP) for Tandem Parking (Hearing Officer); (2) Minor CUP for Transit Oriented Development (Hearing Officer); (3) Design Review (Design Commission); (4) Construction Staging and Traffic Management Plan (Department of Public Works); (5) Demolition, grading, foundation, and building permits; and (6) Such additional actions as may be determined necessary.

Consistent with the CEQA Guidelines, this section of the ~~Draft~~ EIR provides the list of objectives the Applicant seeks to achieve. These include the following development, design, and economic objectives:

- To promote transit-oriented development in the South Fair Oaks Specific Plan area through development of an urban office project consistent with the permitted density within the South Fair Oaks Specific Plan, in proximity to employment, the Gold Line and other transit opportunities.
- To provide an aesthetically attractive office project with pedestrian friendly and community enhancing features, including a large inviting landscaped plaza at the intersection of California Boulevard and Fair Oaks Avenue.
- To develop a project that provides substantial public open space and creates an attractive pedestrian environment.
- To enhance the appearance of the South Fair Oaks Specific Plan area by redeveloping an underutilized site containing obsolete and deteriorating buildings with a modern structure of exceptional architectural design.
- To provide a distinctive office project that will attract and retain businesses in Pasadena and promote economic diversity and jobs in the City.
- To enhance the South Fair Oaks Specific Plan area's prestige as a center for high-quality commercial development.
- To construct a state-of-the-art sustainable development, thereby reducing dependence on non-renewable resources, and that encourages recycling for both construction activities and long-term operation.

C. ALTERNATIVES ELIMINATED FROM FURTHER CONSIDERATION

An EIR must briefly describe the rationale for selection and rejection of alternatives. The lead agency may make an initial determination as to which alternatives are feasible and therefore merit in depth consideration, and which are infeasible. Alternatives that are remote or speculative, or the effects of which cannot be reasonably predicted, need not be considered (CEQA Guidelines, Section 15126.6(f)(3)). This section identifies alternatives considered by the City of Pasadena, the lead agency, but rejected as infeasible, and provides a brief explanation of the reasons for their exclusion. Alternatives may be eliminated from detailed consideration in the EIR if they fail to meet most of the project objectives, are infeasible, or do not avoid any significant environmental effects (CEQA Guidelines, Section 15126.6(c)).

1. Alternative Site Uses

The Project site was reviewed regarding its ability to accommodate alternative uses that might eliminate and/or reduce the Project's significant impacts. The range of feasible uses is limited due to the character of the site, its surroundings and its role within the South Fair Oaks Specific Plan area. Many uses, such as residential development, would not be suited for the Project site and, indeed, would not be permitted per the City's Zoning standards. Residential development would not be consistent with the Specific Plan, which seeks to provide a "... district for biomedical and technology-based companies which can prosper alongside an energetic mix of community serving retail, medical facilities and support services;" consistent with the existing uses in the Project area. If the Project site were not developed for office uses, other commercial uses might be proposed as an alternative use. However, the utility of analyzing such an alternative would be limited as the existing site includes commercial retail development. Although evaluation of an all commercial alternative was eliminated from further consideration, it was decided that an alternative incorporating commercial development and medical office uses be evaluated to illustrate the potential effects of another potential development that could occur on the site in conformance with City plans and regulations.

Generally speaking, the selection of an alternative use at the Project site has limited value in reducing the Project's significant impacts. The proposed Project's only significant impacts pertain to NO_x emissions during construction and a significant street segment impact on Pico Street. Construction activities for projects similar in size to that of the proposed Project typically cause an exceedance of the NO_x emissions thresholds, and such impacts cannot be avoided by altering the longer term uses of the Project site. The significant impact on Pico Street is a function of the relative increase in the number of daily trips from project operations on a roadway with low traffic volumes. Therefore, alternative uses that eliminate the significant impact would not necessarily enhance traffic operations in a meaningful way.

2. Alternative Site Design

The City also considered alternatives based on a redesign of the Project site. The City concluded that the Project is appropriate for the use, consistent with the Design Guidelines of the South Fair Oaks Specific Plan, and consistent with the height, setback, and open space requirements of the City's Zoning Code. Accordingly, the size of the site and zoning requirements would not support a substantial alteration in the basic design of the proposed Project. Further, there are no significant impacts that could be avoided through a project redesign.

3. Alternative Locations

The proposed Project is intended to develop a site that is currently under the ownership of the Project Applicant. CEQA does not require that alternatives be evaluated for sites that proponents cannot reasonably acquire, control or otherwise have access to. The costs for property acquisition at a new location and the lost investment at the current site would be substantial and likely prohibitive.

Further, the City considered other sites in the project area and noted that the proposed site is well suited for the proposed use, and that an alternative at an alternative site would not likely result in a meaningful change or reduction in the impacts of the Project given the built out nature of the area. For example, traffic impacts could actually be more substantial at an alternate site and the Project's significant construction impact would not be avoided. Furthermore, Project impacts could be greater at an alternative site, if it were to be located in closer proximity to sensitive uses. For these reasons, an Alternative Location alternative was eliminated from further consideration and evaluation.

D. ALTERNATIVES TO THE PROPOSED PROJECT

1. Summary of Alternatives

The alternatives analyzed include the mandatory No Project Alternative, and a Reduced Density Alternative. Both were selected due to their potential to at least partially meet the basic objectives of the proposed Project, and to lessen or avoid significant environmental effects resulting from implementation of the proposed Project.

No Project Alternative. Section 15126.6(e) of the CEQA Guidelines requires the analysis of a No Project Alternative. This no project analysis must discuss existing conditions, as well as what would be reasonably expected to occur in the foreseeable future if the project were not to be approved based on current plans, site zoning, and consistent with available infrastructure and community services. Because the proposed Project is a development project, Section 15126.6(e)(3)(B) of the CEQA Guidelines is directly applicable to the proposed Project.

“If the project is a development project on an identifiable property, the “no project” alternative is the circumstance under which the project does not proceed. Here the discussion would compare the environmental effects of the property remaining in its existing state against environmental effects which would occur if the project is approved. If disapproval of the project would result in predictable actions by others, such as the proposal of some other project, this “no project” consequence should be discussed. In certain instances, the “no project”

alternative means “no build” wherein the existing environmental setting is maintained. However, where failure to proceed with the project will not result in preservation of existing environmental conditions, the analysis should identify the practical result of the project’s non-approval and not create and analyze a set of artificial assumptions that would be required to preserve the existing physical environment.”

The No Project Alternative assumes that the property would remain in its existing state as there are no known predictable actions, such as an alternative project, that would occur on the site if the proposed Project were not approved. Under the No Project Alternative there would be no demolition of the existing buildings and it is assumed that the buildings would be rented with commercial uses similar to those which have occupied the Project site in the past. It is assumed that minor tenant improvements would be provided but that there would be no development of new buildings. As such, the No Project Alternative would provide 12,635 square feet of commercial space that would be occupied by restaurants or other complementary uses. The site would continue to contain approximately 75 parking spaces.

Reduced Density Alternative. The Reduced Density Alternative would include the same office uses as the proposed Project with the overall site density reduced by 16 percent, which is the point at which the potential traffic impacts along Pico Street would not exceed the City’s 4.9 percent threshold for physical mitigation for roadway segments. As such the Reduced Density Alternative would reduce project development from 113,200 gross sf. to 95,088 gross sf. of development (82,453 gross sf. of new development). With less development on the Project site, parking could be reduced from 255 parking spaces to 214 spaces. It is assumed that the site layout and access would be similar to the proposed Project since that layout provides efficient accessibility and has been designed to accommodate site access with maximum distances between the garage entrance and site entry points. The reduction in density under this alternative would be achieved through a 16 percent reduction in the building footprint.

Medical Office/Commercial Use. If an office building of the type proposed did not proceed, possible alternative uses that might be pursued include medical office and/or commercial activity. Therefore, an alternative has been included in this analysis that is based on a building of generally similar size and configuration to that of the proposed Project; but with an alternative mix of uses. The No Project – Medical/Office Commercial Use Alternative would include 75,000 square feet of medical office use, and 25,000 square feet of commercial space, in a four story building with commercial activities on the ground floor. It would include commercial activity to complement the on-site medical uses as well as serve the off-site project vicinity.

2. Alternatives Impact Analysis

This section presents an analysis of the project alternatives, including the No Project Alternative, the Reduced Density Alternative, and the Medical Office/Commercial Alternative. The section also provides a comparison of the impacts between these alternatives and the proposed Project for those environmental issues addressed in this ~~Draft~~ EIR. The comparative summary is presented in Table V-1, Comparison of Alternatives and Proposed Project, on page V-26. In all cases, the comparison of impacts assumes all feasible mitigation measures as identified in this EIR have been implemented for the impacts resulting from the proposed Project. Similarly, in all cases where it can be safely assumed that there are feasible mitigation measures for impacts caused by the alternative, it is assumed that those mitigation measures would be implemented. In accordance with CEQA Guidelines Section 15626.6(d), the discussion of the environmental effects of the alternatives may be less than that provided for the proposed Project.

(a) Alternative 1, No Project Alternative

(1) Description

The No Project Alternative assumes existing conditions would be generally maintained on the Project site. The existing uses would continue to operate, and there would be no demolition of the existing buildings. In time, the buildings would receive minor improvements, as necessary to accommodate new tenants. In time the existing buildings could continue to provide 12,635 square feet of commercial space that would be occupied by restaurants or other complementary uses. The site would continue to contain approximately 75 parking spaces.

(2) Comparative Analysis

Air Quality

Construction

The No Project Alternative would involve no significant construction impacts, with negligible impacts on air quality emissions. Improvements might include minor interior renovation and exterior upgrades, e.g. painting, etc. Construction materials would be limited and used in accord with applicable regulations. No site grading would occur. Therefore, the significant impacts associated with the proposed Project for NO_x would not occur and less than significant impacts for PM₁₀, PM_{2.5}, CO, VOC, SOX, TAC and odors would not occur or would be negligible. The No Project Alternative would not result in a meaningful increase in

greenhouse gases due to construction. However, impacts of the proposed Project due to greenhouse gases are less than significant.

Operation

The No Project Alternative would not alter the operations on the Project site, and therefore would have no operational impacts on regional criteria pollutant emissions, local CO concentrations, TAC, odors or consistency with the AQMP. Impacts would be consistent with those of the uses that have occupied the site. While this would be a relative reduction in the level of air quality emissions as compared to the proposed Project, it would not eliminate any significant impacts as the air emissions from the proposed Project are less than significant. The No Project Alternative would not include the positive direct and indirect benefit with regard to the reduction of vehicle trips and vehicles miles traveled that are associated with the proposed Project, which provides for increased density within a transit oriented development (TOD) area, and within a transit rich area having close access to the Gold Line and Bus Lines 20, 51, and 70; and which encourages pedestrian activity. However, overall, the operations impacts of the proposed Project would conservatively be considered greater.

Cultural Resources – Historic Resources

The No Project Alternative would likely result in the removal of the two signs of historic significance, when new tenants occupy the Project site and install their own signs. At the same time, removal of the existing signs would be expected to be provided with the same curation of the signs as the proposed Project. The impacts of the No Project Alternative would be similar to those of the proposed Project, and like the proposed Project would be less than significant.

Cultural Resources – Archaeologic and Paleontologic Resources

Paleontological Resources

The No Project Alternative would require no demolition and no excavation, and therefore could not have an impact on paleontologic resources if any were to be present. Under the proposed Project there is such a potential and, therefore, the potential impact is considered significant prior to mitigation. However, the proposed Project includes mitigation measures to provide for identification, cataloguing and curation of encountered materials. Since the No Project Alternative would have no impacts, its impact would be less than those of the proposed Project, and like the proposed Project would be less than significant.

Archaeological Resources

The No Project Alternative would require no demolition and no excavation and, therefore, could not have an impact on archaeological or Native American resources should they be present. Under the proposed Project there is only a low to moderate potential of encountering resources. Nonetheless, the proposed Project includes mitigation measures to address the unexpected uncovering of such resources. The measures include potential preservation in place where practical and interpretation, documentation and reporting of discovered resources. Any human remains encountered would be checked for Native American descent, with any such remains resulting in consultation with the NAHC and development of a course of action with preservation of the remains in place and project design alternatives as considerations. Thus, the No Project Alternative would lose the opportunity for the discovery of archaeological resources, but would also avoid the potential impact on a burial site. Therefore, impacts of the proposed Project would, on net, be less than those of the proposed Project, and like those of the proposed Project would be less than significant.

Noise

Construction

The No Project Alternative would include no construction and, therefore, would generate no construction noise; or only very minor construction noise associated with minor building renovation. In contrast, the proposed Project would generate construction noise and vibration that would affect buildings approximately 20 feet to the south. The noise levels would be less than the City's noise limit of 85 dBA at a distance of 100 feet, and the vibration would be less than the threshold value of 0.2 inches per second PPV. Notwithstanding, mitigation measures are proposed to reduce the construction noise. Therefore, impacts of the No Project Alternative due to construction noise and vibration would be less than those of the proposed Project, and like the proposed Project would be less than significant.

Operation

The No Project Alternative would generate no new noise from traffic, mechanical equipment, loading docks, or parking facilities, over that which has historically occurred on the Project site. The proposed Project would generate increased noise from increased traffic, and similar noise levels for mechanical equipment, loading docks, and parking activities; however, the increase in noise would be less than significant. Impacts of the No Project Alternative would be less than those of the proposed Project, and like those of the proposed Project would be less than significant.

Traffic

Construction

The No Project Alternative would require no new construction and, therefore, would not generate any traffic impacts due to construction. However, the proposed Project's impacts on traffic due to construction are limited because of the traffic controls that would be implemented through a Construction Staging Management Plan. Impacts of the No Project Alternative would be less than those of the proposed Project, and like those of the proposed Project would be less than significant.

Operation

Street Impacts

The No Project Alternative would generate no new traffic and, therefore, would generate no new traffic impacts due to project operations. The proposed Project has a significant street segment impact on Pico Street; otherwise impacts on the roadway system are less than significant. The No Project Alternative would avoid the proposed Project's one significant impact. However, the significant impact associated with the proposed Project results from the percentage increase in traffic on a street with low traffic volumes, and the proposed Project would not result in traffic congestion. The impacts of the No Project Alternative on traffic operation on the street network surrounding the Project site would be less than those of the proposed Project. Impacts on neighborhood intersections are less than significant under the proposed Project.

Access

The No Project Alternative would have no impact on site accessibility. Site access would continue to be from driveways directly into the Project site on Fair Oaks Avenue, California Boulevard and Edmondson Alley. The proposed Project would include an access system that has been designed to accommodate the project needs. The Project has been designed to minimize off-site queuing, maintain satisfactory service ability for Edmondson Alley, and not introduce project access features that would create or substantially increase hazards of pedestrian or vehicles; thereby resulting in impacts that would be less than significant. However, since the proposed Project would increase the number of vehicles entering the Project site, the No Project Alternative would have fewer impacts than the proposed Project and would also be less than significant.

Hazards

Construction

The No Project Alternative would not include demolition or excavation activities and would have no impact with regard to hazardous conditions. At the same time, the No Project Alternative would leave in place hazardous materials, e.g. asbestos containing materials and lead based paint which are considered hazardous substances, as well as the negligible, actionable level of TPH located within the soil. The proposed Project would have the potential for exposure to existing site contaminants, particularly for construction workers. However this exposure would be limited through regulatory provisions and measures, implemented as mitigation measures, which would ensure public safety. The No Project Alternative would not provide the same level of site remediation as would the proposed Project. Nonetheless, the No Project Alternative would have no impact and, therefore, less impact than the proposed Project. As is the case with the proposed Project, construction impacts in regard to hazardous materials would be less than significant.

Operation

The No Project Alternative would leave in place existing site uses, which in part use common hazardous materials similar to those used in office buildings: e.g. the use and storage of small quantities of potentially hazardous materials in the form of cleaning solvents and pesticides for landscaping. At the same time, the existing auto body shop uses a great range of products that may contain contaminants; however, use of such contaminants is regulated for public safety. Therefore, impacts associated with the No Project Alternative would be similar to those of the proposed Project. In both cases, such materials would be handled in compliance with manufacturer's specifications and applicable standards and regulations. Thus, impacts of the No Project Alternative and the proposed Project regarding hazardous materials would be less than significant.

Water Supply

The No Project Alternative would not increase the water consumption at the Project site, which is estimated to be 12,715 gallons per day. At the same time the No Project Alternative would not incorporate water conservation features as would the proposed Project. The proposed Project would increase water consumption by 9,925 gallons per day for a total of 22,640 gallons per day; but would incorporate water conservation features, thus providing for a more efficient use of water resources. While the proposed Project makes better use of water resources, the No Project Alternative would have less impact on water supply, and its impacts like those of the proposed Project, would be less than significant.

(3) Conclusion and Relationship to Project Objectives

The No Project Alternative would eliminate the proposed Project's significant unavoidable impacts, including the increase in street segment traffic on Pico Street, and the air quality (NOx) impacts due to construction. The No Project Alternative would also reduce other project impacts to less than significant levels through mitigation. At the same time, it would not provide the benefits to the AQMP of locating such a project in a well served transit location, TOD; and would not allow for the site remediation of past hazardous materials, and replacement of dated buildings with a more sustainable and attractive development project.

Although the No Project Alternative would reduce or avoid the proposed Project's environmental impacts, and would not result in any significant environmental impacts, it would not achieve most of the basic objectives of the proposed Project. It would not provide the type of project proposed by the Applicant nor the type of project encouraged in the South Fair Oaks Specific Plan. The No Project Alternative would not provide a transit-oriented urban office project consistent with the permitted density in proximity to employment, the Gold Line and other transit opportunities; provide a project that will attract and retain businesses in Pasadena and promote economic diversity and jobs in the City; nor enhance the Specific Plan area's prestige as a center for high-quality development. Further, the No Project Alternative would not enhance the appearance of the Project site. It would not redevelop an underutilized site with obsolete and deteriorating buildings and limited landscaping with a modern structure of exceptional architectural design; nor provide an attractive office project design with pedestrian friendly public open space/landscaped plaza. The No Project Alternative would not convert the existing site development into a sustainable model of development; although it could encourage greater recycling efforts.

(b) Alternative 2, Reduced Density Alternative

(1) Description

The Reduced Density Alternative would include the same office uses as the proposed Project with the overall site density reduced by 16 percent, which is the point at which the potential traffic impacts along Pico Street would not exceed the City's 4.9 percent threshold for physical mitigation for roadway segments. As such, the Reduced Density Alternative would reduce project development from 113,200 gross square feet to 95,088 gross square feet of development (82,453 gross square feet of new development). With less development on the Project site, parking could be reduced from 255 parking spaces to 214 spaces. It is assumed that the site layout and access would be similar to the proposed Project since that layout provides efficient accessibility and has been designed to accommodate site access with maximum

distances between the garage entrance and site entry points. The most likely design would be a 16 percent reduction in the building footprint.

(2) Comparative Analysis

Air Quality

Construction

The Reduced Density Alternative would require demolition of the existing buildings and construction of a new building, with underground parking. However, by reducing the overall density of the development, the amount of construction and excavation would be reduced by approximately 16 percent thus reducing the air quality emissions, and reducing in particular the level of NO_x. Impacts of the proposed Project were significant for NO_x, while less than significant for PM₁₀, PM_{2.5}, CO, VOC, SO_x, TAC and odors. The Reduced Density Alternative would also reduce the level of greenhouse gases due to construction. While the impacts of the Reduced Density Alternative would be less than those of the proposed Project, the resulting impact for NO_x would still be significant on a daily basis. The smaller project size would likely decrease the time over which construction occurs, i.e. it would reduce the number of days on which NO_x impacts occur, but would not change the maximum generation on any one day. (The significance impact for construction regional emissions is based on a calculation of maximum daily impacts.)

Operation

The Reduced Density Alternative would add additional and new operations to the Project site compared to existing conditions, thus increasing air quality emissions that would be generated from on-site activity. However, with less office space than the proposed Project on-site activity would be reduced; and operations impacts on regional criteria pollutant emissions, local CO concentrations, TAC, and odors would be reduced. While this would be a relative reduction in the level of air quality emissions, it would not eliminate any significant impacts as the air emissions from the proposed Project are less than significant. The Reduced Density Alternative would like the proposed Project have AQMP benefits regarding the reduction of vehicle trips and vehicles miles traveled that are associated with the proposed Project, which increases density within a transit oriented development (TOD) area, and within a transit rich area having close access to the Gold Line and Bus Lines 20, 51, and 70; and which encourages pedestrian activity. However, the Reduced Density Alternative would not have the same level of benefit with regard to increasing density within the TOD. The non-significant operations impacts of the Reduced Density Alternative on air quality would be less than those of the proposed Project.

Cultural Resources – Historic Resources

The Reduced Density Alternative would, like the proposed Project, require the removal of the two signs of historic significance. At the same time, the Reduced Density Alternative would be expected to provide the same curation of the signs as the proposed Project, which would possibly be beneficial to the community. The impacts of the Reduced Density Alternative would be similar to those of the proposed Project and, like the proposed Project, would be less than significant.

Cultural Resources – Archaeologic and Paleontologic Resources

Paleontological Resources

The Reduced Density Alternative would require demolition and excavation on the Project site and, therefore, could have an impact on paleontologic resources if any were to be present. Under the proposed Project there is also such a potential and, therefore, the potential impact is considered significant prior to mitigation. However, the proposed Project includes mitigation measures to provide for identification, cataloguing and curation of encountered materials. Such mitigation measures would be applied to the Reduced Density project as well. Since the Reduced Density Alternative would affect a lesser volume of excavation, the potential impacts of construction on paleontological resources would be considered less than those of the proposed Project; and like those of the proposed Project, would be less than significant.

Archaeological Resources

The Reduced Density Alternative would require demolition and excavation, and therefore could have an impact on archaeological or Native American resources should they be present. Under the proposed Project there is only a low to moderate potential of encountering resources. Nonetheless, the proposed Project includes mitigation measures that would be applicable to the Reduced Density Alternative as well, to address the unexpected uncovering of such resources. The measures include potential preservation in place where practical and interpretation, documentation and reporting of discovered resources. Any human remains encountered would be checked for Native American descent, with any such remains resulting in consultation with the NAHC and development of a course of action with preservation of the remains in place and project design alternatives as considerations. Since the amount of excavation required for the Reduced Density Alternative would be less, the potential of encountering and impacting a resource would be less. Impacts of the Reduced Density Alternative, like those of the proposed Project, would be less than significant.

Noise

Construction

The Reduced Density Alternative would include construction activities, and therefore would generate construction noise. As noted for the proposed Project, construction on the Project site would generate construction noise and vibration that would affect buildings approximately 20 feet to the south. The noise levels would be less than the City's noise limit of 85 dB at a distance of 100 feet, and the vibration would be less than the threshold value of 0.2 inches per second PPV. Nonetheless, mitigation measures are proposed to reduce the construction noise. The maximum noise and vibration levels for the Reduced Density Alternative would be similar to those of the proposed Project; however, the construction noise would occur for fewer days with the smaller construction program. Therefore, impacts of the Reduced Density Alternative due to construction noise and vibration would be less than those of the proposed Project, and like the proposed Project would be less than significant.

Operation

The Reduced Density Alternative would generate new noise from traffic, mechanical equipment, loading docks, or parking facilities. The proposed Project's noise from all of these noise sources was determined to be less than significant for each. With reduced site activity and trip generation, impacts of the Reduced Density Alternative would be less than those of the proposed Project and, like those of the proposed Project, would be less than significant.

Traffic

Construction

The Reduced Density Alternative would require new construction and therefore would generate traffic impacts due to construction. The proposed Project's impacts on traffic due to construction would be limited because of the traffic controls that would be implemented through a Construction Staging Management Plan. Impacts of the Reduced Density Alternative would be less than those of the proposed Project since the construction activities would occur over fewer days, and like those of the proposed Project would be less than significant.

Operation

Street Impacts

The Reduced Density Alternative would generate new traffic impacts with the addition of an office building on the Project site. The trip generation would be reduced from that of the proposed Project by 16 percent, producing 1,047 weekday trips in contrast to the proposed Project's 1,246 weekday trips. However, the net increase, which was 253 trips for the proposed Project after credits for a TDM program, previous land use and existing land use, would be 74 trips or 29.2 percent of the proposed Project's increase. The proposed Project has a significant street segment impact on Pico Street; otherwise impacts on the roadway system are less than significant. Assuming a similar trip percentage of new trips using Pico Street for the Reduced Density Alternative, approximately 74 percent or 55 new daily trips would occur on Pico Street. This is an increase of approximately 4.8 percent over the estimated 2010 1,136 trips occurring along the street segment, requiring soft mitigation. This is within the 4.9 percent physical mitigation criterion and would be less than significant, avoiding the proposed Project's one significant unavoidable traffic impact. The significant impact associated with the proposed Project results from the percentage increase in traffic on a street with low traffic volumes, and the proposed Project itself would not result in traffic congestion. The reduction would not be sufficient to reduce the LOS levels at any of neighborhood intersections; e.g. the intersection of Fair Oaks and California Boulevard would continue to operate at LOS C during the A.M and P.M peak hours. Impacts of the Reduced Density Alternative would be less than those of the proposed Project, and remain less than significant.

Access

The Reduced Density Alternative would have a site access plan similar to that of the proposed Project but would generate fewer vehicles entering the Project site. The proposed Project would include an access system that has been designed to accommodate the Project needs with provision of queuing on-site. Impacts would be negligible and less than significant. However, since the Reduced Density Alternative would decrease the number of vehicles entering the Project site, the Reduced Density Alternative would have fewer impacts than the proposed Project and would also be less than significant.

Hazards

Construction

The Reduced Density Alternative would include demolition and excavation activities and would therefore have a potential to encounter hazardous substances, e.g. asbestos containing

materials and lead based paint. The proposed Project would also cause exposure to existing site contaminants, particularly for construction workers however this exposure would occur through regulatory measures, included as mitigation measures which would ensure public safety. The Reduced Density Alternative would also be required to provide site remediation. Impacts regarding the potential to encounter hazardous materials under the Reduced Density Alternative would be less than those of the proposed Project. As is the case with the proposed Project, construction impacts in regard to hazardous materials would be less than significant.

Operation

The Reduced Density Alternative would use similar hazardous materials to those used in the proposed Project's office building, e.g. the use and storage of small quantities of potentially hazardous materials in the form of cleaning solvents and pesticides for landscaping. Therefore, impacts associated with the Reduced Density Alternative would be similar to those of the proposed Project. In both cases, such material would be handled in compliance with manufacturer's specifications and applicable standards and regulations. Thus, impacts of Reduced No Density Alternative and the proposed Project regarding hazardous materials would be less than significant.

Water Supply

The Reduced Density Alternative would increase the water consumption at the Project site to 18,112 gallons per day, which is an increase of 5,397 gallons per day over the 12,715 gallons per day associated with current and previous site use. In contrast the proposed Project would increase water consumption by 9,925 gallons per day, which is 80 percent greater than the Reduced Density Alternative. Both projects would be required to incorporate water conservation features, thus providing for more efficient use of water resources consistent with City requirements for avoiding significant impacts. Therefore, impacts of the Reduced Density Alternative on water supply would be less than those of the proposed Project, and like the proposed Project would be less than significant.

(3) Conclusion and Relationship to Project Objectives

The Reduced Density Alternative would avoid the proposed Project's potentially significant impact regarding streets segments but would not avoid its significant air quality (NOx) impacts due to construction. Beyond this, the Reduced Density Alternative would marginally reduce the proposed Project's non-significant impacts. At the same time, the Reduced Density Alternative would not provide the same beneficial contribution to the efficient use of the TOD zone for reducing regional vehicle miles.

The Reduced Density Alternative would only partially meet the objectives of the proposed Project. It fails to meet all of the objectives due to its decreased density. It would still provide a transit-oriented urban office project in proximity to employment, the Gold Line and other transit opportunities; provide a project that will attract and retain businesses in Pasadena and promote economic diversity and jobs in the City; and enhance the Specific Plan area's prestige as a center for high-quality development. However, it would not meet any of these objectives as fully as the proposed Project and would not meet the component of the objectives seeking a project consistent with permitted density. The Reduced Density Alternative would enhance the appearance of the Project site; redeveloping an underutilized site with obsolete and deteriorating buildings with a modern structure of exceptional architectural design; providing an attractive office project design with pedestrian friendly public open space/landscaped plaza, and converting the site development into a sustainable model of development.

(c) Alternative 3, Medical Office/Commercial Use Alternative

(1) Description

The Medical Office/Commercial Alternative represents an alternative that could feasibly be pursued if the proposed office uses were not approved for the Project site. The Medical/Office Commercial Use Alternative is based on a building of generally similar size and configuration to that of the proposed Project; but with an alternate mix of uses. It would include 75,000 square feet of medical office use, and 25,000 square feet of commercial space, in a four story building with commercial activities on the ground floor. The commercial uses would have an orientation toward the medical office activity including such uses a pharmacy, sit-down restaurant/cafeteria for office workers and visitors, etc. While many of the uses would be so oriented, commercial uses would serve the nearby and pass by population as well. The Project would include an access scheme similar to that of the proposed Project. This alternative would require 387 parking spaces or approximately 50 percent more than the proposed Project. This would require at least one additional level of subterranean parking as compared to the proposed Project, and the location of some surface parking spaces for quick stop commercial uses. It is assumed that the appropriate level of parking could be provided through an appropriate project/site design.

(2) Comparative Analysis

Air Quality

Construction

The Medical Office/Commercial Alternative would require demolition of the existing buildings and construction of a new building, with underground parking. The extent of this grading would be more extensive with this alternative than with the proposed Project due to the additional grading that would be required to provide the necessary parking, thus increasing air emissions levels, in particular the level of NO_x, which was significant for the Project. It would also increase emissions for PM₁₀, PM_{2.5}, CO, VOC, SO_x, TAC and odors. PM₁₀, and PM_{2.5}, emissions could, although not necessarily, become significant. Either the increased excavation could be carried out over a longer time frame resulting in the same level of daily emissions as the Project, or if done in the same time frame would increase the daily emissions. (The significance impact for construction regional emissions is based on a calculation of maximum daily impacts.) The Medical Office/Commercial Alternative would also increase the level of greenhouse gases due to construction.

Operation

The Medical Office/Commercial Alternative would add additional, new operations to the Project site thus increasing the air quality emissions that would be generated from on-site activity. However, this alternative would generate more traffic than the proposed Project thus increasing operations impacts on regional criteria pollutant emissions and local CO concentrations. Toxic Air Contaminants (TAC) would be similar and odors could be increased due to food preparation in the alternative's commercial component. The Medical Office/Commercial Alternative would, like the proposed Project, have AQMP benefits regarding the reduction of vehicle trips and vehicles miles traveled that are associated with the proposed Project: increased density within a transit oriented development (TOD) area, within a transit rich area having close access to the Gold Line and Bus Lines 20, 51, and 70, and encouragement of pedestrian activity. The non-significant operations impacts of the Medical Office/Commercial Alternative on air quality would be greater than those of the proposed Project, although they may still remain less than significant.

Cultural Resources – Historic Resources

The Medical Office/Commercial Alternative would, like the proposed Project, require the removal of the two signs of historic significance. At the same time, the Medical Office/Commercial Alternative would be expected to provide the same curation of the signs as the proposed Project, which would possibly be beneficial to the community. The impacts of the

Medical Office/Commercial Alternative would be similar to those of the proposed Project, and like the proposed Project would be less than significant.

Cultural Resources – Archaeologic and Paleontologic Resources

Paleontological Resources

The Medical Office/Commercial Alternative would require demolition and excavation on the Project site and, therefore, could have an impact on paleontologic resources if any were to be present. Under the proposed Project there is also such a potential and therefore the potential impact is considered significant prior to mitigation. However, the proposed Project includes mitigation measures to provide for identification, cataloguing and curation of encountered materials. Such mitigation measures would be applied to the Medical Office/Commercial Alternative project as well. Since the Medical Office/Commercial Alternative would affect a greater volume of excavation, the potential impacts of construction on paleontological resources would be considered greater than those of the proposed Project; and like those of the proposed Project would be less than significant, due to mitigation.

Archaeological Resources

The Medical Office/Commercial Alternative would require demolition and excavation, and, therefore, could have an impact on archaeological or Native American resources should they be present. Under the proposed Project there is only a low to moderate potential of encountering resources. Nonetheless, the proposed Project includes mitigation measures, which would be applicable to the Medical Office/Commercial Alternative as well, to address the unexpected uncovering of such resources. The measures include potential preservation in place where practical and interpretation, documentation and reporting of discovered resources. Any human remains encountered would be checked for Native American descent, with any such remains resulting in consultation with the NAHC and development of a course of action with preservation of the remains in place and project design alternatives as considerations. The greater depth of excavation required for the Medical Office/Commercial Alternative would occur below the area of likely archaeological resources should any be present. Therefore, the potential of encountering and impacting a resource would be similar to those of the proposed Project. Impacts of the Medical Office/Commercial Alternative, like those of the proposed Project, would be less than significant.

Noise

Construction

The Medical Office/Commercial Alternative would include construction activities, and therefore would generate construction noise. As noted for the proposed Project, construction on the Project site would generate construction noise and vibration that would affect buildings approximately 20 feet to the south. The noise levels would be less than the City's noise limit of 85 dB at a distance of 100 feet, and the vibration would be less than the threshold value of 0.2 inches per second PPV. Notwithstanding, mitigation measures are proposed to reduce the construction noise. The maximum noise and vibration levels for the Medical Office/Commercial Alternative would be similar to those of the proposed Project; however, the construction noise could occur for a greater number of days due to the additional excavation required for the alternative. Therefore, impacts of the Medical Office/Commercial Alternative due to construction noise and vibration would be greater than those of the proposed Project, and like the proposed Project would be less than significant.

Operation

The Medical Office/Commercial Alternative would generate new noise from traffic, mechanical equipment, loading docks, or parking facilities. The proposed Project's noise from all of these noise sources was determined to be less than significant for each. With increased traffic generation, impacts of the Medical Office/Commercial Alternative would be greater than those of the proposed Project, but could still be less than significant.

Traffic

Construction

The Medical Office/Commercial Alternative would require new construction and therefore would generate traffic impacts due to construction. The proposed Project's impacts on traffic due to construction would be limited because of the traffic controls that would be implemented through a Construction Staging Management Plan. Impacts of the Medical Office/Commercial Alternative would be slightly greater than those of the proposed Project due to the amount of excavation that would be required for an additional level of subterranean parking. However, this alternative would implement a similar Construction Staging Management Plan, and its construction impacts, like those of the proposed Project, would be less than significant.

Operation

Street Impacts

The Medical Office/Commercial Alternative would generate new traffic at the Project site of approximately 3,610 trips per day. This contrasts with the 1,246 trips for the proposed Project. When accounting for TDM credit, drive by credit for restaurants and credit for existing site uses the Medical Office/Commercial Alternative has a net increase in the number of trips of 2,381 in contrast to the proposed Project's net increase of 253 daily trips. The proposed Project's additional 253 trips were concluded to result in a significant street segment impact on Pico Street. Otherwise impacts on the roadway system for the proposed Project are less than significant. Assuming a similar trip percentage of new trips using Pico Street for the Medical Office/Commercial Alternative, approximately 74 percent or 1,762 new trips would occur on Pico Street. This is an increase of approximately 22 percent over the existing 2008, 1,125 daily trips occurring along the street segment. This is substantially greater than the City's 2.5 percent soft mitigation criterion, 5.0 percent physical mitigation, and 7.5 percent extensive physical mitigation criterion. The significant impact associated with the proposed Project results from the percentage increase in traffic on a street with low traffic volumes, and the proposed Project would not result in traffic congestion. However, the substantially greater level of traffic with the alternative would be likely to result in significant impacts not identified for the proposed Project.

The proposed Project has less than significant impacts on nearby intersection operations during the A.M. and P.M. peak hours. In contrast, the Medical Office/Commercial Alternative would add substantially more traffic to the intersections. During the A.M. peak hour, the Medical Office/Commercial Alternative would add an estimated 213 trips to the roadway system or 148 net trips after accounting for TDM, pass by and existing/previous use credits. This increase is 31 percent greater the proposed Project increase of 113 trips. During the P.M. peak hour, the Medical Office/Commercial Alternative would add an estimated 360 trips to the roadway network, or 212 net trips after accounting for TDM, pass by and existing/previous use credits. This increase is 5.3 times greater than the increase of the proposed Project's 40 trips. This increase could potentially lead to a significant impact.

Access

The Medical Office/Commercial Alternative would have a site access plan similar to that of the proposed Project, but would experience more vehicles entering the Project site. The proposed Project would include an access system that has been designed to accommodate the project needs with provision of queuing on-site. Impacts would be negligible and less than significant. Since the Medical Office/Commercial Alternative would increase the number of vehicles entering the Project site, the Medical Office/Commercial Alternative would have greater impacts than the proposed Project. However, given the queuing availability on-site and the

mixed-use distribution of vehicles over the day, a sufficient access plan could be accommodated within the design of the alternative, and as was the case with the proposed Project, access impacts would be less than significant.

Hazards

Construction

The Medical Office/Commercial Alternative would include demolition and excavation activities and would therefore have a potential to encounter hazardous substances, e.g. asbestos containing materials and lead based paint. The proposed Project would also cause exposure to existing site contaminants, particularly for construction workers however this exposure would occur through regulatory measures, included as mitigation measures which would ensure public safety. The Medical Office/Commercial Alternative would also be required to provide site remediation. Impacts regarding the potential to encounter hazardous materials under the Medical Office/Commercial Alternative would be less than those of the proposed Project. As is the case with the proposed Project, construction impacts in regard to hazardous materials would be less than significant.

Operation

The Medical Office/Commercial Alternative would to some extent use similar hazardous materials to those used in the proposed Project's office building, e.g. the use and storage of small quantities of potentially hazardous materials in the form of cleaning solvents and pesticides for landscaping; although in lesser amount. Therefore, impacts associated with the Medical Office/Commercial Alternative would be similar to those of the proposed Project. In both cases such material would be handled in compliance with manufacturer's specifications and applicable standards and regulations. In addition, medical offices may require the handling of some hazardous substances, in compliance with regulations for the handling of such materials. Thus, potential impacts of the Medical Office/Commercial Alternative could be greater than those of the propose Project, but as is the case with the proposed Project, impacts regarding hazardous materials due to operations would be less than significant.

Water Supply

The Medical Office/Commercial Alternative would increase the water consumption at the Project site to approximately 33,649 gallons per day, which is an increase of 20,934 gallons per

day over the 12,715 gallons per day associated with current and previous site use.¹ In contrast the proposed Project would increase water consumption by 9,925 gallons per day, or approximately one half the amount of the Medical Office/Commercial Alternative. Both projects would be required to incorporate water conservation features, thus providing for more efficient use of water resources consistent with City requirements for avoiding significant impacts. Therefore, impacts of the Medical Office/Commercial Alternative on water supply would be greater than those of the proposed Project, and like the proposed Project would be less than significant.

(3) Conclusion and Relationship to Project Objectives

The analysis of the Medical Office/Commercial Alternative demonstrates that these uses tend to increase impacts rather than decrease impacts. Their increased parking demand requires greater excavation and, therefore, greater construction impacts, thereby increasing the levels of the Project's significant (NO_x) impacts due to construction. PM₁₀ and PM_{2.5} emissions would also notably be increased, possibly but not necessarily exceeding significance levels. The greater amounts of excavation would increase the potential for encountering paleontologic resources. Also, these uses would increase the number of daily trips to the Project site thereby increasing the Project's significant traffic impact on Pico Street. Further, project operations would increase impacts related to water consumption, intersection impacts and related air quality and noise impacts. The Medical Office/Commercial Alternative would provide the same beneficial contribution to the efficient use of the TOD zone for reducing regional vehicle miles, as would the proposed Project.

The Medical Office/Commercial Alternative would mostly meet the objectives of the proposed Project. It would provide a dense transit oriented development in proximity to employment, the Gold Line and other transit opportunities; provide a project that will attract and retain businesses in Pasadena and promote economic diversity and jobs in the City; and enhance the Specific Plan area's prestige as a center for high-quality development. The Medical Office/Commercial Alternative would enhance the appearance of the Project site; redevelop an underutilized site with obsolete and deteriorating buildings with a modern structure of attractive architectural design; and convert the site development into a sustainable model of development. However, the presentation of commercial uses at the ground level and necessity to accommodate some parking on the ground level would not provide an attractive project design with pedestrian friendly public open space/landscaped plaza to the same extent as would the proposed Project.

¹ The estimate of 32,716 gallons per day is based on the following: Wastewater generation would be 75,000 sq.ft. of medical office uses at a rate of 250 gallons per day/1,000 sq.ft; 20,000 sq.ft. of general retail uses at a rate of 80 gallons per day and 5,000 sq.ft. of sit-down/fast turnover restaurant, or 225,300 gallons per day. Assuming wastewater generation is 75 percent of water demand, this converts to 33,649 gallons per day of water consumption.

3. Comparison of Alternatives and Identification of the Environmentally Superior Alternative

The State CEQA Guidelines require the identification of an environmentally superior alternative to the proposed Project and, if the environmentally superior alternative is the “No Project Alternative,” the identification of an environmentally superior alternative should be from among the remaining alternatives.² Selection of an environmentally superior alternative is based on an evaluation of the extent to which the alternatives would reduce or eliminate the significant impacts associated with the Project, and on a comparison of the remaining environmental impacts of each alternative. The relative environmental characteristics of the proposed Project, the No Project Alternative, Reduced Density Alternative, and the Medical Office/Commercial Alternative described in the prior analysis are summarized in Table V-1 on page V-26.

Of the alternatives analyzed in this EIR, the No Project Alternative is considered the environmentally superior alternative, as it would avoid the proposed Project’s significant impacts due to construction (i.e. NO_x emissions) and street segment impacts on Pico Street. In addition, the No Project Alternative would avoid the remaining less than significant impacts that would occur under the project. The No Project Alternative, however, would be less beneficial with respect to the AQMP and would meet none of the Project objectives.

As the No Project Alternative is determined to be the environmentally superior alternative, an alternative selection is required. The Medical Office/Commercial Alternative would increase project impacts including the intensity of the Project’s significant impacts. In contrast, the Reduced Density Alternative would eliminate the proposed Project’s significant unavoidable impact regarding streets segments but would not avoid its significant unavoidable air quality (NO_x) impacts due to construction. Beyond this, the Reduced Density Alternative would generally, marginally reduce the proposed Project’s non-significant impacts. Therefore, the Reduced Density Alternative is the environmentally superior alternative amongst the alternatives analyzed.

At the same time, the Reduced Density Alternative would not provide the same beneficial contribution to the efficient use of the TOD zone for reducing regional vehicle miles; and would not fully meet the project objectives. It would not meet the component of the objectives seeking a project consistent with permitted density: it would not so fully meet objectives pertaining to provision of a transit-oriented urban office project in proximity to employment, the Gold Line and other transit opportunities; provision of a project that will attract and retain businesses in Pasadena and promote economic diversity and jobs in the City; and enhancement of the Specific Plan area’s prestige as a center for high-quality development.

² CEQA Guidelines, Section 15126.6(e)(2).

Table V-1

Comparison of Alternatives and Proposed Project

Environmental Issue Area	Project Impact	Alternative 1 No Project Alternative	Alternative 2 Reduced Density Alternative	Alternative 3 Medical Office/Commercial Alternative
Air Quality				
• Construction	Significant With Mitigation	Less (No Impact)	Less (Significant With Mitigation)	Greater (Significant With Mitigation)
• Operation	Less than Significant	Less (No Impact)	Less (Less than Significant)	Greater (Less than Significant)
Cultural Resources				
• Historic Resources	Less than Significant With Mitigation	Less (No Impact)	Similar (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)
Paleontological and Archaeological				
• Paleontological Resources	Less than Significant With Mitigation	Less (No Impact)	Less (Less than Significant With Mitigation)	Greater (Less than Significant With Mitigation)
• Archaeological Resources	Less than Significant With Mitigation	Less (No Impact)	Less (Less than Significant With Mitigation)	Similar (Less than Significant With Mitigation)
Noise				
• Construction	Less than Significant With Mitigation	Less (No Impact)	Less (Less than Significant With Mitigation)	Greater (Less than Significant With Mitigation)
• Operation	Less than Significant	Less (No Impact)	Less (Less than Significant)	Greater (Less than Significant)
Traffic				
• Construction	Less than Significant With Mitigation	Less (No Impact)	Less (Less than Significant With Mitigation)	Greater (Less than Significant With Mitigation)
• Operation	Significant With Mitigation	Less (No Impact)	Less (Less than Significant)	Greater (Significant with Mitigation)
• Access	Less than Significant	Less (No Impact)	Less (Less than Significant)	Greater (Less than Significant)

Table V-1 (Continued)

Comparison of Alternatives and Proposed Project

Environmental Issue Area	Project Impact	Alternative 1 No Project Alternative	Alternative 2 Reduced Density Alternative	Alternative 3 Medical Office/Commercial Alternative
Hazards				
• Construction	Less than Significant With Mitigation	Less (No Impact)	Similar (Less than Significant With Mitigation)	Similar (Less than Significant With Mitigation)
• Operation	Less than Significant With Mitigation	Less (No Impact)	Similar (Less than Significant)	Greater (Less than Significant)
Water Supply	Less than Significant With Mitigation	Less (No Impact)	Less (Less than Significant With Mitigation)	Greater (Less than Significant With Mitigation)
<hr/> <p><i>Source: PCR Services Corporation, 2009.</i></p>				