This section of the environmental impact report (EIR) provides a comparative analysis of the merits of alternatives to the Project pursuant to Section 15126.6 of the California Environmental Quality Act (CEQA) Guidelines, as amended. The purpose of the alternatives analysis is to explain potentially feasible ways to avoid or minimize significant effects of the Project. According to the State CEQA Guidelines, the EIR need only examine in detail those alternatives that could feasibly meet most of the basic objectives of the Project. When addressing feasibility, the State CEQA Guidelines, Section 15126.6 states that:

among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, jurisdictional boundaries, and whether the applicant can reasonably acquire, control or otherwise have access to alternative sites.

The State CEQA Guidelines also specify that the alternatives discussion should not be remote or speculative, and need not be presented in the same level of detail as the assessment of the Project.

Therefore, based on the State CEQA Guidelines, several factors need to be considered in determining the range of alternatives to be analyzed in an EIR and the level of analytical detail that should be provided for each alternative. These factors include: (1) the nature of the significant impacts of the project, (2) the ability of alternatives to avoid or lessen the significant impacts associated with the project, (3) the ability of the alternatives to meet the objectives of the project, and (4) the feasibility of the alternatives. These factors would be unique for each project.

## **SELECTION OF ALTERNATIVES FOR ANALYSIS**

According to the State CEQA Guidelines, the discussion of alternatives should focus on alternatives to a project or its location that can feasibly avoid or substantially lessen the significant effects of the project. The State CEQA Guidelines indicate that the range of alternatives included in this discussion should be sufficient to allow decision makers a reasoned choice. Moreover, the alternatives discussion should provide decision makers with an understanding of the merits and disadvantages of these alternatives.

**Section 4.0, Environmental Impact Analysis**, of this EIR concludes that Project implementation would not result in significant and unavoidable historic resources impacts. Nonetheless, the City of Glendale ("City") identified and considered several alternatives to the Project to determine that would provide for a range of alternatives to the Project. These alternatives included the No Project Alternative, Relocation of the existing Craftsman Homes located on the Project site, and Development of the Project site with Craftsman Homes.

## ALTERNATIVES CONSIDERED BUT NOT EVALUATED IN DETAIL

Section 15126.6(c) of the State CEQA Guidelines states that an EIR should briefly describe the rationale for selecting the alternatives to be discussed and the reasons for eliminating alternatives from detailed consideration in an EIR. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR is failure to meet most of the basic Project objectives, infeasibility, or inability to avoid or substantially reduce significant environmental impacts. Provided in the following paragraphs are the reasons for not providing a detailed evaluation of an off-site alternative.

## **Alternative Site**

An alternative site would involve the development of the Project at a different location. Given that neither the Project Applicant nor the City owns or controls any other property near the Project site, the ability of the Applicant to find and purchase an alternative site on which to develop the Project is considered speculative. In addition, the development of an alternative site may not be able to meet the Project objectives and would not reduce any significant impacts, since the existing homes on the site are not historic resources. For these reasons, the selection of an alternative site would not avoid any significant impacts.

CEQA Guidelines, Section 15126.6(c), states "among factors that may be used to eliminate alternatives from detailed consideration in an EIR are (i) failure to meet most of the project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts." As discussed previously, the relocation of the Project to an alternative site would not be feasible because obtaining an alternative site is considered speculative and because development on an alternative site would not avoid or substantially lessen any of the significant effects of the Project. Therefore, this alternative has been eliminated from detailed consideration within this EIR.

#### ALTERNATIVES EVALUATED IN DETAIL

As discussed previously, the City identified several alternatives for analysis in this EIR to determine if these alternatives could avoid or substantially lessen any significant impacts of the Project and meet the basic Project objectives listed in **Section 3.0**, **Project Description**. The objectives of the Project are to:

- Support the goals of the Downtown Specific Plan for the East Broadway District;
- Redevelop underutilized property to provide additional housing opportunities in downtown Glendale
  in close proximity to employment opportunities, public facilities, and goods and services;
- Provide well-designed development that is compatible and complementary with surrounding land uses;

• Utilize architectural design, lighting, and landscape design to enhance the architectural character of the proposed buildings and contribute to creating an attractive downtown Glendale;

• Provide property tax revenues to the City of Glendale; and

Generate construction employment opportunities in the City and in the region.

**Section 4.0, Environmental Impact Analysis**, of this EIR concludes that the Project would not result in any significant impacts to historic resources. Nonetheless, City is evaluating the following alternatives to meet the CEQA Guidelines requirements for alternatives analysis in an EIR:

Alternative 1: No Project/No Development

Alternative 2: Relocation of Craftsman Homes

Alternative 3: Development of Site with Both Craftsman Homes Remaining

# Alternative 1—No Project/No Development Alternative

The No Project/No Development Alternative is required to be evaluated by Section 15126(2)(4) of the State CEQA Guidelines. As required by the State CEQA Guidelines, the analysis must examine the impacts that might occur if the site is left in its present condition, as well as what may 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.

Under the No Project/No Development Alternative, the Project site would remain in its current existing condition. The on-site buildings would remain. This alternative would avoid all the impacts of the Project as proposed. Since no significant impacts have been identified for the Project, this alternative would not avoid significant impacts.

The Downtown Specific Plan designates the Project site for midrise and moderate-density residential uses to help support the retail area developing along East Broadway, while the No Project/No Development Alternative would avoid development of the site at this time, it is likely future projects consistent with the DSP would be proposed.

Under this alternative, the following Project objectives would not be met:

Support the goals of the Downtown Specific Plan for the East Broadway District;

 Redevelop underutilized property to provide additional housing opportunities in downtown Glendale close to employment opportunities, public facilities, and goods and services;

 Provide well-designed development that is compatible and complementary with surrounding land uses;

- Utilize architectural design, lighting, and landscape design to enhance the architectural character of the proposed buildings and contribute to creating an attractive downtown Glendale;
- Provide property tax revenues to the City of Glendale; and
- Generate construction employment opportunities in the City and in the region.

## Alternative 2—Relocation of Craftsman Homes

This alternative would involve the relocation of the two existing on-site Craftsman homes to an undetermined alternate site within the City. The development on the Project site would be the same as for the Project. Development would consist of a new 44-unit multifamily residential project, including a publicly accessible open space area, landscaping, lighting, utilities, subterranean parking garage, and associated amenities. The residential units would be designed in a variety of layouts and sizes to include one-bedroom, two-bedroom, and three-bedroom units surrounding a central courtyard open toward the north. The proposed 5-story structure would be approximately 74 feet 6 inches in height to the stair tower and have a floor-area ratio (FAR) of 2.75.

The successful relocation of these existing wood frame residential buildings would likely not be feasible, given their age, structural condition, and the presence of both wood rot and termite damage. At the present time, neither the Project Applicant nor the City owns or controls any other property near the Project site where these homes could be relocated to. The ability and cost of acquiring a suitable alternative site cannot be determined. For these reasons, Alternative 2 may not be economically feasible for the Applicant. In addition, as discussed below, because no significant impact to historic resources will result from the Project as proposed, the relocation of the Craftsman homes would not reduce or eliminate a significant impact.

As indicated in **Section 4.0, Environmental Impact Analysis**, the property does not meet the criteria of the Glendale Register of Historic Resources or the California Register of Historical Resources, and does not meet the definition of a "historical resource" or "historically significant" property under CEQA. Additionally, the two Craftsman homes at 128 and 132 South Kenwood Street that make up the property do not, as a pair or grouping of properties, have historic significance or meet the eligibility criteria for the various register programs, including the City's Historic District Overlay Zone. For this reason, the relocation of the Craftsman homes would not reduce or eliminate a significant historical impact.

Under the Relocation of Craftsman Homes alternative, the following Project objectives would not be meet or only partially be met:

Support the goals of the Downtown Specific Plan for the East Broadway District;

- Redevelop underutilized property to provide additional housing opportunities in downtown Glendale in close proximity to employment opportunities, public facilities, goods and services;
- Provide well-designed development that is compatible and complementary with surrounding land uses;
- Utilize architectural design, lighting, and landscape design to enhance the architectural character of the proposed buildings and contribute to creating an attractive downtown Glendale;
- Provide property tax revenues to the City of Glendale; and
- Generate construction employment opportunities in the City and in the region.

## Alternative 3—Development of Site with Craftsman Homes

This alternative would involve new development on a portion of the Project site and retaining the single-family Craftsman residences (126 and 132 South Kenwood) and a multifamily residential triplex (132A/132B South Kenwood). Development would occur on the vacant lot at 126 South Kenwood. This alternative would consist of a 3-story building with levels of flats over grade-level parking. The unit count would include twelve 1-bedroom flats at approximately 800 square feet each and 12 parking stalls. The building would be developed as a rental apartment project, as opposed to the for sale ownership condominium project proposed as part of the Project.

The development density and resulting amount of rental income from the new apartments and existing triplex and single-family home may not be sufficient to offset the cost of the land and construction of the new apartment building and may not be economically feasible for the Applicant for this reason. In addition, as discussed below, because the Proposed Project would not result in any significant impacts, maintaining the Craftsman homes would not reduce or eliminate a significant historical impact.

As concluded in **Section 4.0, Environmental Impact Analysis**, the property does not meet the criteria of the Glendale Register of Historic Resources or the California Register of Historical Resources, and does not meet the definition of a "historical resource" or "historically significant" property under CEQA. Additionally, the two Craftsman homes at 128 and 132 South Kenwood Street that make up the property, do not, as a pair or grouping of properties, have historic significance or meet the eligibility criteria for the various register programs, including the City's Historic District Overlay Zone.

In addition, this alternative would not meet or only partially meet the following Project objectives:

- Support the goals of the Downtown Specific Plan for the East Broadway District;
- Redevelop underutilized property to provide additional housing opportunities in downtown
   Glendale in close proximity to employment opportunities, public facilities, goods and services;
- Provide well-designed development that is compatible and complementary with surrounding land uses;

- Utilize architectural design, lighting, and landscape design to enhance the architectural character of the proposed buildings and contribute to creating an attractive downtown Glendale;
- Provide property tax revenues to the City of Glendale; and
- Generate construction employment opportunities in the City and in the region.

# **Environmentally Superior Alternative**

CEQA Guidelines Section 15126.6(e)(2) requires an EIR to identify an environmentally superior alternative among those evaluated in an EIR. Of the alternatives considered in this section, the No Project Alternative is environmentally superior to the other alternatives because this alternative would not result in an increase in building intensity on the site and site would remain in its current condition, which would avoid any impacts of the Project as proposed. Since the Project as proposed would not result in any significant impacts, this impact would not avoid any significant impacts.

According to the CEQA Guidelines, if the No Project Alternative is identified as the environmentally superior alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives. Of the other alternatives considered, Alternative 3—Development of Site with Both Craftsman Homes Remaining would be considered environmentally superior because it would result in a greater incremental reduction of the overall level of impact when compared to the Project due to the reduction in intensity of development on the Project site. However, Alternative 3 would not meet or would only partially meet the majority of the objectives of the Project (e.g., less tax revenue, employment opportunities, the redeveloping of underutilized property to provide additional residential opportunities, etc.). In addition, the reduced development density and resulting reduced revenue due to the smaller project size of Alternative 3 may not be sufficient to offset the cost of the land and may not be economically feasible for this reason.