

7.0 Alternatives to the Proposed Project



7.0 ALTERNATIVES TO THE PROPOSED PROJECT

Under CEQA, the identification and analysis of alternatives to a project is a fundamental part of the environmental review process. Public Resources Code (PRC) § 21002.1(a) establishes the need to address alternatives in an EIR by stating that in addition to determining a project's significant environmental impacts and indicating potential means of mitigating or avoiding those impacts, "the purpose of an environmental impact report is ... to identify alternatives to the project."

Direction regarding the definition of project alternatives is provided in *CEQA Guidelines* § 15126.6(a), as follows:

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.

The *CEQA Guidelines* emphasize that the selection of project alternatives be based primarily on the ability to reduce impacts relative to the proposed project, "even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly."¹ The *CEQA Guidelines* further direct that the range of alternatives be guided by a "rule of reason," such that only those alternatives necessary to permit a reasoned choice are addressed.²

In selecting project alternatives for analysis, potential alternatives must pass a test of feasibility. *CEQA Guidelines* § 15126.6(f)(1) 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, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site. . .

Beyond these factors, *CEQA Guidelines* require the analysis of a "no project" alternative and an evaluation of alternative location(s) for the project, if feasible. Based on the alternatives analysis, an environmentally superior alternative is to be designated. If the environmentally superior alternative is the No Project Alternative, then the EIR shall identify an environmentally superior alternative among the other alternatives.³ In addition, *CEQA Guidelines* § 15126.6(c) requires that an EIR identify any alternatives that were considered for analysis but rejected as infeasible and discuss the reasons for their rejection.

The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making. The range of potential alternatives to the proposed project shall also 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. An alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative need not be considered.

¹ *CEQA Guidelines* § 15126.6(b).

² *CEQA Guidelines* § 15126.6(f).

³ *CEQA Guidelines* § 15126.6(e)(2).



PROJECT OBJECTIVES

The proposed Project objectives, as referenced in the Lincoln Specific Plan, are to:

- Deliver a mix of land uses including residential, commercial and recreational elements;
- Generate net revenue for the City of Whittier General Fund;
- Provide access to the site from Whittier Boulevard and Sorensen Avenue (not from the adjacent residential neighborhood);
- Provide for a range of housing types and opportunities to address a variety of lifestyles, life stages and economic segments of the marketplace;
- Create public space amenities within the commercial area;
- Create connectivity between land uses;
- Provide for recreational amenities within walking distance of residential neighborhoods;
- Create a Freedom Trail, an enhanced multi-purpose trail that navigates through the community connecting parks, land uses and the adjacent hospital;
- Provide for diversity in architectural design along with traditional design elements reflecting some of the characteristics of older, established Whittier;
- Make plans to retain select existing buildings of architectural interest on the site (Administration Building and Superintendent's Residence);
- Re-use existing building materials on site when economically feasible;
- Implement sustainable building practices addressing energy efficiency;
- Redevelop a blighted area of the City;
- Implement the City's General Plan;
- Provide housing opportunities at the least cost possible to serve a diverse population; and
- Create a mixed-use project to promote internal capture and to reduce vehicle miles traveled.

PROJECT SIGNIFICANT AND UNAVOIDABLE IMPACTS

Per the CEQA Guidelines, only those impacts found significant and unavoidable are relevant in making the final determination of whether an alternative is environmentally superior or inferior to the proposed Project. As discussed throughout Section 5.0, *Environmental Analysis*, Project impacts involving the following environmental issue areas would remain significant and unavoidable:



- Air Quality (see [Section 5.2](#))
 - Construction emissions;
 - Operational emissions;
 - Air Quality Management Plan consistency; and
 - Cumulative emissions.
- Cultural Resources (see [Section 5.4](#))
 - Historical resources impacts; and
 - Cumulative historical resources impacts.
- Greenhouse Gas Emissions (see [Section 5.6](#))
 - Project greenhouse gas emissions; and
 - Cumulative greenhouse gas emissions.
- Transportation and Traffic (see [Section 5.14](#))
 - City/County roadway intersections;
 - State Highway intersections;
 - State Highway segments;
 - Congestion Management Program intersections; and
 - Cumulative traffic impacts.

ALTERNATIVES CONSIDERED BUT REJECTED

In accordance with CEQA Guidelines § 15126.6(c), an EIR should identify any alternatives that were considered for analysis but rejected as infeasible and briefly explain the reasons for their rejection. According to the CEQA Guidelines, among the factors that may be used to eliminate alternatives from detailed consideration are the alternative's failures to meet most of the basic project objectives, the alternative's infeasibility, or the alternative's inability to avoid significant environmental impacts.

- *“Alternative Site” Alternative.* One alternative that has been considered and rejected as infeasible is the Alternative Site Alternative. The Project site is available for development because it is a non-operational and underutilized site within the City of Whittier. The Alternative Site Alternative would require adequate land, access, and infrastructure capable of supporting the development proposed under the Lincoln Specific Plan (Specific Plan). The availability of similar properties of an adequate size and with similar infrastructure, access, and land use characteristics within the City is limited. In addition, the Project site's location (along the Whittier Boulevard frontage) is advantageous for a project consisting of residential and commercial/retail facilities, providing ease of access and convenience/visibility for commercial/retail uses. No other available properties with suitable development characteristics exist along Whittier Boulevard. Thus, it is not considered feasible that the Applicant would be able to acquire another property within the City on which to develop a project of similar size and scale to that currently proposed.

In addition, this Alternative would not accomplish the key Project objective of redeveloping the vacant, blighted former youth correctional facility that has been non-operational since 2004. The Project site has not been regularly maintained, many buildings are in disrepair, and landscaping throughout the site has not been irrigated for approximately 10 years (and thus is in distressed condition). Moreover, implementation of the proposed improvements on an alternative site would likely result in many of the



same significant and unavoidable air quality and greenhouse gases impacts identified under the proposed Project, and significant traffic impacts may also occur depending on site location and roadway characteristics. As such, this alternative has been rejected from further consideration by the City.

- “Alternative Use” Alternative. The Alternative Use Alternative would involve either All Residential Alternative or All Commercial Alternative. An All Residential Alternative would not deliver a mix of land uses including residential, commercial and recreational elements, create public space amenities within the commercial area, and would not create a mixed use Project to promote internal capture and to reduce vehicle miles traveled as only one land use type would be provided – residential. With only residential uses, there would be no other uses to mix or include as complementary land uses, thus not meeting these objectives.

An All Commercial Alternative also would not deliver a mix of land uses including residential, commercial and recreational elements, provide for a range of housing types and opportunities to address a variety of lifestyles, life stages and economic segments of the marketplace, provide housing opportunities at the least cost possible to serve a diverse population; and create a mixed use project to promote internal capture and to reduce vehicle miles traveled within the Specific Plan Area as identified as key Project objectives. As only commercial uses would be developed, this Alternative does not allow for residential uses or other uses to provide for a mixed use. Consequently, both an All Residential Alternative and an All Commercial Alternative have been rejected from further consideration by the City.

- “Historic Structure (Additional Onsite Relocation)” Alternative. The proposed Project would include the adaptive reuse of the Superintendent’s Residence and the Administration Building in their existing locations onsite. As noted in Section 5.4, Cultural Resources, mitigation has been identified that would also require the reuse of the Chapels Building in its current location, and the onsite relocation and reuse of the Assistant Superintendent’s Residence.

Under the Historic Structure (Additional Onsite Relocation) Alternative, the remaining four historic structures (Auditorium, Old Infirmary, Maintenance Garage, and Gymnasium) would be relocated and reused onsite. While this Alternative would minimize impacts to historic resources, it could still result in significant and unavoidable impacts to historic resources, and is not considered a feasible Alternative based upon the *Reuse Feasibility Study* (refer to Appendix 11.17, Reuse Feasibility Study). According to the *Reuse Feasibility Study* prepared for the proposed Project and peer reviewed by City consultants, the onsite relocation of these four structures is considered infeasible for the following reasons:

- The Maintenance Garage is a large, unreinforced masonry structure, and substantial damage to the building would occur during any relocation process. In addition, relocation of the Auditorium, Old Infirmary, and Gymnasium would be infeasible due to the substantial amount of seismic bracing that would be required, and safety concerns during the moving process.⁴
- The onsite relocation of the four buildings is also considered economically infeasible. The Reuse Feasibility Study included a detailed review of economic

⁴ EPS, *Reuse Feasibility Study, Nelles Correctional Facility Redevelopment*, August 11, 2014.



feasibility through market, construction cost, and subsidy analyses. When comparing the costs of onsite relocation and restoration to the costs associated with new construction, it was determined that the relocation/restoration costs far exceed the costs of new construction. This increased cost is due a number of factors, including substantially greater subsidy costs through building and wall disassembly, tile removal and reinstallation, disconnection of utilities, transportation and installation of existing walls to their new location. Onsite relocation of these buildings would also result in lost land revenue that would otherwise have been realized through new construction. The increased costs associated with onsite relocation, as described in the Reuse Feasibility Study, are as follows:⁵

1. Auditorium: When comparing the cost of onsite relocation of the Auditorium to new construction, onsite relocation would result in a net loss of \$1,560,905 (relocation and rehabilitation costs would be 131 percent greater than new construction). When considering reuse subsidies (and accounting for historic tax credits), onsite relocation would incur a -66.3 percent return on costs. In addition, the market value of land displaced by the relocated Auditorium would have a value of \$1,631,400 that would not be realized under this Alternative.
2. Old Infirmary: When comparing the cost of onsite relocation of the Old Infirmary to new construction, onsite relocation would result in a net loss of \$1,451,008 (relocation and rehabilitation costs would be 201 percent greater than new construction). When considering reuse subsidies (and accounting for historic tax credits), onsite relocation would incur a -53.2 percent return on costs. In addition, the market value of land displaced by the relocated Infirmary would have a value of \$1,732,000 that would not be realized under this Alternative.
3. Maintenance Garage: When comparing the cost of onsite relocation of the Maintenance Garage to new construction, onsite relocation would result in a net loss of \$3,331,196 (relocation and rehabilitation costs would be 161 percent greater than new construction). When considering reuse subsidies (and accounting for historic tax credits), onsite relocation would incur a -50.8 percent return on costs. In addition, the market value of land displaced by the relocated Maintenance Garage would have a value of \$1,080,100 that would not be realized under this Alternative.
4. Gymnasium: When comparing the cost of onsite relocation of the Gymnasium to new construction, onsite relocation would result in a net loss of \$3,955,536 (relocation and rehabilitation costs would be 226 percent greater than new construction). When considering reuse subsidies (and accounting for historic tax credits), onsite relocation would incur a -40.5 percent return on costs. In addition, the market value of land displaced by the relocated Gymnasium would have a value of \$1,253,000 that would not be realized under this Alternative.

As noted above, relocation of the Maintenance Garage, Auditorium, Old Infirmary, and Gymnasium would be infeasible due to the building damage that would occur during

⁵ Ibid.



moving, substantial amount of seismic bracing that would be required, and safety concerns during the relocation process. In addition, the economic losses expected to be incurred would reduce profitability (even with historic tax credits) such that it would make this Alternative infeasible, since it would fail to attract capital investment in a competitive market environment.⁶ Thus, the Historic Structure (Additional Onsite Relocation) Alternative has been rejected from further analysis since it would not be considered feasible.

- “Historic Structure (Offsite Relocation)” Alternative. As noted above, the proposed Project would include the adaptive reuse of the Superintendent’s Residence and the Administration Building in their existing locations onsite. As noted in Section 5.4, the EIR identifies mitigation that would also require the reuse of the Chapels Building in its current location, and the onsite relocation and reuse of the Assistant Superintendent’s Residence.

Under the Historic Structure (Offsite Relocation) Alternative, the remaining four historic structures (Auditorium, Old Infirmary, Maintenance Garage, and Gymnasium) would be relocated and reused offsite at another location within the City where the buildings could be adaptively reused or preserved. While this Alternative would minimize impacts to historic resources, it would still result in impacts to a historic resource, and it is not considered a feasible Alternative by the City. According to the Reuse Feasibility Study, the offsite relocation of these four structures is considered infeasible for the following reasons:

- The Maintenance Garage is a large, unreinforced masonry structure, and substantial damage to the building would occur during any relocation process. In addition, relocation of the Auditorium, Old Infirmary, and Gymnasium would be infeasible due to the substantial amount of seismic bracing that would be required, and safety concerns during the moving process.⁷
- The offsite relocation of the four buildings is also considered economically infeasible. The Reuse Feasibility Study included a detailed review of economic feasibility through market, construction cost, and subsidy analyses. When comparing the costs of offsite relocation and restoration to the costs associated with new construction, it was determined that the relocation/restoration costs far exceed the costs of new construction. This increased cost is due to a number of factors, including substantially greater subsidy costs through building and wall disassembly, tile removal and reinstallation, disconnection of utilities, transportation and installation of existing walls to their new location. Offsite relocation of these buildings would also result in lost land revenue that would otherwise have been realized through new construction. The increased costs associated with offsite relocation, as described in the Reuse Feasibility Study, are as follows:⁸
 1. Auditorium: When comparing the cost of offsite relocation of the Auditorium to new construction, offsite relocation would result in a net loss of \$2,566,833 (relocation and rehabilitation costs would be 215 percent greater than new construction). When considering reuse

⁶ Ibid.

⁷ Ibid.

⁸ Ibid.



subsidies (and accounting for historic tax credits), offsite relocation would incur a -71.7 percent return on costs.

2. Old Infirmary: When comparing the cost of offsite relocation of the Old Infirmary to new construction, offsite relocation would result in a net loss of \$1,776,872 (relocation and rehabilitation costs would be 246 percent greater than new construction). When considering reuse subsidies (and accounting for historic tax credits), offsite relocation would incur a -58.8 percent return on costs.
3. Maintenance Garage: When comparing the cost of offsite relocation of the Maintenance Garage to new construction, offsite relocation would result in a net loss of \$3,324,800 (relocation and rehabilitation costs would be 161 percent greater than new construction). When considering reuse subsidies (and accounting for historic tax credits), offsite relocation would incur a -52.7 percent return on costs.
4. Gymnasium: When comparing the cost of offsite relocation of the Gymnasium to new construction, offsite relocation would result in a net loss of \$4,947,296 (relocation and rehabilitation costs would be 283 percent greater than new construction). When considering reuse subsidies (and accounting for historic tax credits), offsite relocation would incur a -47.2 percent return on costs.

As noted above, relocation of the Maintenance Garage, Auditorium, Old Infirmary, and Gymnasium would be infeasible due to the building damage that would occur during moving, substantial amount of seismic bracing that would be required, and safety concerns during the relocation process. In addition, the economic losses expected to be incurred would reduce profitability such that it would make this Alternative infeasible, since it would fail to attract capital investment in a competitive market environment.⁹ Thus, the Historic Structure (Offsite Relocation) Alternative has been rejected from further analysis since it would not be considered feasible.

PROJECT ALTERNATIVES

Potential environmental impacts associated with the following alternatives are compared to impacts from the proposed Project since they could potentially reduce and/or eliminate one or more significant impacts associated with the Project:

- No Project Alternative;
- “Reduced Density” Alternative;
- “Reduced Density/Additional Historic Preservation” Alternative;
- “Age Restricted Residential” Alternative; and
- “Large Format Retail” Alternative.

Throughout the following analysis, the alternatives’ impacts are analyzed for each environmental issue area, as examined in Sections 5.1 through 5.14. In this manner, each alternative can be compared to the proposed Project on an issue-by-issue basis. Table 7-9, Comparison of Alternatives, which is included at the end of this Section, provides an overview of

⁹ Ibid.



the alternatives analyzed and a comparison of each alternative's impacts in relation to the proposed Project. Section 7.6, *Environmentally Superior Alternative*, references the "environmentally superior" alternative, as required by the *CEQA Guidelines*.

7.1 "NO PROJECT" ALTERNATIVE

Pursuant to *CEQA Guidelines* Section 15126.6(e)(2), the No Project Alternative must be analyzed within the EIR. In accordance with the *CEQA Guidelines*, "the no project analysis shall discuss the existing conditions ..., as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services."¹⁰ The *CEQA Guidelines* continue to state that "in certain instances, the no project alternative means 'no build' wherein the existing environmental setting is maintained."¹¹ Thus, the "No Project" Alternative assumes that no development would take place onsite and that the site would remain in its existing underutilized and disturbed condition.

DESCRIPTION OF ALTERNATIVE

The Project site is generally comprised of two areas: a former youth correctional facility area (approximately 74 acres); and an adjacent commercial area (approximately two acres) located at the eastern corner of the site. Exhibit 3-3, *Aerial Photo* depicts the Project site in the context of its environmental setting. The youth correctional facility is developed with structures, hardscapes, landscaping, and associated infrastructure related to the site's prior use. The two-acre property is currently occupied by a commercial use (auto recycling business) and vacant railroad right-of-way.

The "No Project" Alternative would retain the Project site in its current condition. With this Alternative, the site would remain developed with the former youth correctional facility, related structures, hardscapes, landscaping, and infrastructure and the existing auto recycling business and vacant railroad right-of-way. Under the No Project Alternative, the Specific Plan would not be implemented. No demolition or adaptive reuse of onsite structures would occur, and none of the onsite or offsite improvements described in the Specific Plan would be implemented. None of the proposed amendments to the City's Zoning Code or Zoning Map would be implemented. No Certificates of Appropriateness for historic structures would occur. None of the improvements proposed as part of the Tentative Tract Map approval would be constructed and the property would not be prepared to define legal parcels and lots. Proposed standards and conditions that would govern development of the Specific Plan area proposed in the Development Agreement would not occur. Proposed improvements to the City's transportation circulation system, including enhancements to the City's roadway network (Whittier Boulevard, Sorensen Avenue, and Elmer Avenue extension), and bicycle and pedestrian networks, would not be constructed. The former youth correctional facility and auto recycling business would remain in their current state.

While the analysis for the No Project Alternative assumes that the Project site would remain in its existing state, there is a potential that reuse of the site could occur in the event the Lincoln Specific Plan is not implemented. Although there are no reasonably foreseeable reuse plans for the former Nelles facility, as a State-owned and former California Department of Corrections

¹⁰ *CEQA Guidelines* § 15126.6(e)(2).

¹¹ *CEQA Guidelines* § 15126.6(e)(3)(B).



and Rehabilitation (CDCR) facility, the site could be potentially reused as an updated correctional facility or similar institutional use.

The following discussion evaluates the potential environmental impacts associated with the No Project Alternative, as compared to impacts from the proposed Project.

IMPACT COMPARISON TO THE PROPOSED PROJECT

Aesthetics, Light & Glare

The existing visual character of the Project site is illustrated on the following exhibits: Exhibit 5.1-1, Existing Onsite Conditions; Exhibit 5.1-4, Key Views 1 and 2 – Existing Conditions; Exhibit 5.1-5, Key Views 3 and 4 – Existing Conditions; and Exhibit 5.1-6, Key Views 5 and 6 – Existing Conditions. The short-term visual impacts associated with grading and construction activities that would occur with the proposed Project would not occur with the No Project Alternative. Therefore, the Project's construction-related impacts to the visual character/quality of the Project site and its surroundings would be avoided.

None of the long-term alterations to the site's visual character would occur under the No Project Alternative. None of the residential, commercial, and open space uses proposed under the Lincoln Specific Plan would be implemented. Since the site would remain in its existing state, none of the impacts (both adverse and beneficial) would occur under this Alternative. Impacts related to massing and scale, increased building heights, and visible hardscape would not occur. However, the No Project Alternative would also not implement visual/aesthetic improvements, as the proposed Project would remove the existing perimeter security fencing, numerous existing vacant and aging structures (e.g., Key Views 2 and 5, where substantial portions of 15-foot-high fencing and razor wire would be removed), and unhealthy trees. None of the lighting improvements associated with the Project would occur, and lighting from vehicle headlights generated by Project traffic would be eliminated.

The No Project Alternative would be environmentally superior to the proposed Project regarding aesthetics/light and glare, given it would eliminate impacts related to short-term visual character/quality, long-term visual character/quality, and light/glare.

Air Quality

Short-Term Impacts. Short-term air quality Project-level and cumulative impacts from demolition, grading, and construction activities associated with the proposed Project would not occur with the No Project Alternative, as demolition or development activities would not occur. Therefore, the significant and unavoidable short-term construction impacts identified for the proposed Project related to nitrogen oxides (NO_x) and localized NO_x construction emissions would no longer occur.

Long-Term Impacts. Long-term air quality impacts from area and mobile source pollutant emissions associated with the proposed Project would not occur with the No Project Alternative, as new emissions would not be generated. The Project's long-term combined area and mobile source pollutant emissions would exceed South Coast Air Quality Management District (SCAQMD) reactive organic compounds (ROG), and NO_x thresholds resulting in a significant unavoidable impact. These significant unavoidable impacts would be avoided with the No Project Alternative, as new long-term emissions would not be generated.



Air Quality Management Plan (AQMP) Consistency. The Project's long-term influence would be consistent with the AQMP and Southern California Association of Governments (SCAG) goals and policies. However, the Project's exceedance of operational ROG, and NO_x thresholds would potentially result in a long-term impact on the region's ability to meet State and Federal air quality standards. Therefore, Project impacts associated with AQMP compliance would be significant and unavoidable. As concluded above, the No Project Alternative would avoid the significant unavoidable long-term air quality impacts associated with the proposed Project. As new emissions would not be generated, this Alternative would also be compliant with the AQMP; thus, avoiding the Project's significant unavoidable impact associated with AQMP compliance.

The No Project Alternative would be environmentally superior to the proposed Project regarding air quality impacts, as no construction-related, area and mobile source emissions would be generated. This Alternative would avoid the Project's significant unavoidable impacts from regional NO_x construction emissions, localized NO_x construction emissions, operational ROG and NO_x emissions, and AQMP conflicts.

Biological Resources

The Project would result in less than significant direct and indirect impacts to special-status plant and wildlife species with mitigation incorporated. Under the No Project Alternative, none of the Project's impacts to special-status plant and wildlife species would occur, as existing vegetation and trees would not be disturbed and new land uses would not be developed. The Project's potential impacts to nesting and limited foraging habitats of raptors, owls, and passerines would be avoided with this Alternative, as the existing site would be retained and new land uses would not be developed.

The No Project Alternative would be environmentally superior to the proposed Project regarding biological resources, as no plant or wildlife species would be impacted.

Cultural Resources

The Project would result in significant and unavoidable impacts to historical resources as the Project involves substantial adverse changes to several historical resources. Since the No Project Alternative would not involve the demolition of any onsite structures, the Project's significant unavoidable impact associated with historical resources would be avoided. However, this Alternative would also allow the Nelles facility to continue in its unmaintained condition, with structures, landscaping, and infrastructure continuing to age and degrade in condition. The Project would result in less than significant impacts to as yet undiscovered archaeological and paleontological resources, with mitigation incorporated. Under this Alternative, these potential Project impacts would be avoided, as ground disturbing activities would not occur. This Alternative would also avoid the Project's potential for disturbing human remains, which is concluded to be less than significant through compliance with the established regulatory framework.

The No Project Alternative would be environmentally superior to the proposed Project regarding cultural resources. The Project's significant unavoidable impacts related to historical resources would be avoided as demolition of existing onsite structures would not occur. Additionally, there would be no potential for impacting archaeological/paleontological resources or human remains, since ground disturbing activities would not occur.



Geology and Soils

The soil erosion or loss of topsoil from grading and excavation operations that would occur with the proposed Project would not occur with the No Project Alternative, since no ground disturbance would occur. The Project site is susceptible to seismic-, geologic-, and soils-related hazards, and impacts related to Project implementation were determined to be less than significant with mitigation. Implementation of the No Project Alternative would not expose additional people or structures to potential adverse effects associated with seismic, geologic, or soil hazards, since new land uses, structures, and ground disturbance would not occur.

The No Project Alternative would be environmentally superior to the proposed Project regarding seismicity, geology, and soils, given it would not expose additional people or structures to potential hazards.

Greenhouse Gas Emissions (GHG)

As indicated in Table 5.6-2, *Mitigated Greenhouse Gas Emissions*, Project-related GHG emissions would be 7.2 metric tons of CO₂ equivalent (MTCO₂eq) per capita per year, exceeding the per capita per year Project level GHG threshold, and resulting in a significant and unavoidable impact. Since the No Project Alternative would not result in short- or long-term GHG emissions, this Alternative would avoid the Project's significant unavoidable Project-level and cumulative impacts associated with GHG emissions.

The No Project Alternative would be environmentally superior to the proposed Project regarding GHG emissions, since no increase in GHG emissions would occur and the Project's significant unavoidable impact from GHG emissions would be avoided.

Hazards and Hazardous Materials

Short-term construction-related impacts involving the potential for accidental release of hazardous materials would not occur with the No Project Alternative, since buildings would not be demolished/removed and ground-disturbing activities would not occur. Less than significant potential impacts (with mitigation incorporated) involving accidental release of hazardous materials from construction activities would occur with the Project. These impacts would not occur with this Alternative, as no construction activities would occur on the site.

For the proposed Project, less than significant operational impacts relating to hazards and hazardous materials would occur following compliance with the established regulatory framework and recommended mitigation. However, since new development would not occur with this Alternative, long-term operational impacts involving the potential for hazards to the public or environment through the handling, storage, and/or use of hazardous materials, and accidental conditions involving the release of hazardous materials, would not occur with this Alternative.

Although adverse construction and operational impacts would no longer occur under the No Project Alternative, beneficial Project impacts would also no longer occur. As noted in Section 5.7, *Hazardous Materials*, existing hazardous materials contamination has been noted in various locations of the Project site, including leaking underground storage tanks (LUSTs). Mitigation within Section 5.7 requires the Project Applicant to enter into an agreement with the California Department of Toxic Substances Control (DTSC) under the California Land Reuse and Revitalization Act (CLRRRA) program, which would include the implementation of a



Remedial Response Plan and a Soil Management and Contingency Plan (SMCP) for the Project site. As such, under the No Project Alternative, beneficial impacts related to the remediation of existing hazardous materials onsite would no longer occur.

With respect to hazards and hazardous materials, the No Project Alternative would be neither environmental superior nor environmentally inferior as compared to the proposed Project, since both adverse and beneficial impacts would no longer be realized.

Hydrology and Water Quality

The No Project Alternative would not result in short-term impacts to water quality, since grading, excavation, and construction activities would not occur. The less than significant short-term water quality impacts that would occur with the Project would be avoided with this Alternative.

Project implementation would increase the rate and amount of stormwater runoff, and change its quality, by development of impervious surfaces and new land uses. The Project's potential long-term hydrology and water quality impacts, which were concluded to be less than significant, would be avoided with this Alternative. In addition, Project implementation would increase the Project site's average percent imperviousness from 40 percent to 76.5 percent, thus, reducing the volume of water that infiltrates into the ground. However, Project implementation would not substantially interfere with groundwater recharge, as the Project site is not located within a designated groundwater recharge area. The Project's impacts to groundwater resources, which were concluded to be less than significant, would be avoided with this Alternative. However, it should be noted that certain beneficial impacts associated with the Project would no longer be realized under this Alternative (i.e., various unpaved areas of the site that currently result in erosion impacts would continue to occur).

The No Project Alternative would be environmentally superior to the proposed Project regarding hydrology and water quality, since no ground disturbing activities would occur, impervious surfaces would not increase, and new land uses would not be developed.

Land Use and Planning

2012 Regional Transportation Plan (RTP)/Sustainable Community Strategy (SCS). The No Project Alternative would maintain existing uses land uses without additional development. As such, it would not be required to demonstrate consistency with the RTP/SCS Goals and growth forecasts and no impacts would occur in this regard. As with the proposed Project, this Alternative would not conflict with the 2012 RTP/SCS Goals and growth forecasts; refer to Section 5.9, Land Use and Planning, for 2012 RTP/SCS Goals that are applicable to the Project.

Whittier General Plan, Section 5.9, Land Use and Planning, concludes that the Project would be consistent with the policies of the City's General Plan. Generally, the No Project Alternative would not conflict with the City's General Plan since no development would occur on the Project site. However, according to Figure 4-1 of the General Plan Housing Element, the former Nelles facility is listed as a "housing opportunity site" that would assist the City in fulfilling its long-range goals for housing. Under the No Project Alternative, no new housing would be constructed on the site; thus, this would not be consistent with the General Plan Housing Element.

Whittier Municipal Code (WMC) and Whittier Boulevard Specific Plan (WBSP). This Alternative would not result in a Zoning Code and Zoning Map Amendments, as would occur with the



proposed Project. As such, the site's existing Specific Plan (SP - Whittier Boulevard Specific Plan) would not be changed to SP, Lincoln Specific Plan. Therefore, the uses and standards set forth in the WBSP would remain applicable to the Project site. A Tentative Tract Map defining the property into legal parcels and lots would also not be required. In addition, the Project's proposed Certificate of Appropriateness for structures built prior to 1941 would not occur under this Alternative. Given that this Alternative would maintain the site in its current developed condition, this Alternative is similarly anticipated to be consistent with the WMC and WBSP.

Urban Decay. With the No Project Alternative, the site would maintain its existing uses and no commercial and retail facilities would be developed. As such, the less than significant impacts of urban decay, which would occur with the Project, would be avoided with this Alternative.

The No Project Alternative would be neither environmentally superior nor inferior in comparison to the proposed Project. Although this Alternative would avoid any potential impacts related to urban decay, it would not achieve the City's long-range housing goals for the Project site (thus representing an inconsistency with the City's General Plan Housing Element).

Fiscal

The No Project Alternative would avoid the General Fund costs and revenues associated with the proposed Project. However, as noted in Section 5.10, *Fiscal Impacts*, the Project is expected to result in a beneficial fiscal impact, since it would create a positive revenue to cost ratio for the site. Since this beneficial impact would no longer occur under the No Project Alternative, this Alternative is considered environmentally inferior to the proposed Project.

Noise

Short-Term. Construction noise associated with the Project would result in less than significant impacts, with mitigation incorporated, regarding exposure to surrounding sensitive receptors to noise levels in excess of the established standards. Construction activities would cause less than significant mobile noise along access routes to and from the site due to movement of equipment and workers. The Project's construction-related vibration impacts are also anticipated to be less than significant. All Project-level and cumulative construction-related noise and vibration impacts associated with the Project would be avoided under the No Project Alternative, since no construction would occur.

Long-Term. Existing modeled noise levels from mobile sources are outlined in Table 5.11-5, *Existing Traffic Noise Levels*, and range from 55.5 dBA to 69.2 dBA at 100 feet from the centerline. These existing conditions would continue with the No Project Alternative, although, adjacent noise-sensitive receptors may be impacted by additional growth in the area. Project implementation would result in less than significant impacts from mobile noise sources. The increase in average daily trips (ADT) projected to occur with the proposed Project would not occur with this Alternative, because new land uses would not be developed. Therefore, although less than significant, the Project-level and cumulative long-term noise impacts from mobile sources would be avoided.

Project implementation would result in less than significant impacts from stationary noise sources, with mitigation incorporated. Noise impacts from stationary sources would not occur with this Alternative, because new land uses would not be developed. Therefore, although less



than significant, the Project-level and cumulative long-term noise impacts from stationary sources would also be avoided.

The No Project Alternative would be environmentally superior to the proposed Project regarding noise, since no increases in short-term construction-related or long-term operational mobile or stationary noise would occur.

Public Services and Recreation

The No Project Alternative would avoid the Project's increased demands for fire and police protection, schools, and parks and recreational facilities, since new land uses would not be developed. The No Project Alternative would be environmentally superior to the proposed Project regarding impacts to public services and recreation, since new land uses would not be developed and increased demands for services and facilities would not occur.

Utilities and Service Systems

The No Project Alternative would avoid the Project's increased demands for water supplies and conveyance facilities, wastewater treatment and sewers, solid waste disposal, and dry utilities, since new development would not occur. Additionally, none of the infrastructure improvements proposed by the Project would occur with this Alternative; therefore, the environmental impacts associated with their development would be avoided. Thus, the No Project Alternative would be environmentally superior to the proposed Project in regards to utilities and service systems, since no additional demand would occur.

Transportation and Traffic

Based on Section 5.14, *Transportation and Traffic*, the proposed Project would result in significant and unavoidable impacts related to City/County roadway intersections, State Highway intersections, State Highway segments, and Congestion Management Program facilities. The No Project Alternative would not generate any new vehicular trips, and thus the significant Project-level and cumulative impacts identified for the proposed Project would be avoided. Thus, the No Project Alternative would be environmentally superior to the proposed Project regarding transportation/traffic impacts, as new trips would not be generated and no traffic impacts to local and regional transportation facilities would occur.

ABILITY TO MEET PROJECT OBJECTIVES

The No Project Alternative would not meet any of the Project objectives identified above.

7.2 “REDUCED DENSITY” ALTERNATIVE

DESCRIPTION OF ALTERNATIVE

The Reduced Density Alternative would be the same as the proposed Project, but would consist of a reduced development density for residential and commercial uses. The size and boundaries of the site (approximately 76 acres) would remain the same, as would the infrastructure, roadway, and other ancillary improvements required to support the Project. The general arrangement of uses on the site would remain similar, with commercial uses fronting Whittier Boulevard, residential uses within the western and southern portions of the site, a large



open space area (Independence Green) within the center of the site, and other open space/recreational areas situated throughout the Specific Plan area. Similar to the Project, this Alternative includes demolition of all existing structures onsite, aside from the Administration Building and Superintendent’s Residence, and that site grading activities would be the same. For the purposes of this analysis, this Alternative assumes an overall reduction of 50 percent of residential and commercial development. As shown below in Table 7-1, Comparison of Proposed Project and Reduced Density Alternative, this Alternative would result in the construction of a total of 375 residential dwelling units and 104,175 square feet of commercial development. Since additional undeveloped area would occur under this Alternative as compared to the proposed Project, it is assumed that these areas would be occupied by additional open space, landscaping, and hardscapes under the Reduced Density Alternative. All other aspects of this Alternative would remain the same as the proposed Project.

**Table 7-1
Comparison of Proposed Project and Reduced Density Alternative**

Description	Residential Dwelling Units	Commercial (SF)	Open Space/ Rec. (Acres)	Roads (Acres)	TOTAL (DU)	TOTAL (SF)
Proposed Project	750	208,350	4.6	11.4	750	208,350
Reduced Density Alternative	375	104,175	34.2 ¹	11.4	375	104,175
<i>Difference</i>	-375	-104,175	+29.6	0	-375	-104,175
<i>% Difference</i>	-50%	-50%	+643%	0	-50%	-50%
Notes:						
1. The acreages under the proposed Project for residential (41.5 acres) and commercial (17.7 acres) total 59.2 acres. Assuming development is reduced by 50 percent, 29.6 acres would be available for open space, landscaping, and hardscapes. This 29.6 acres has been added to the 4.6 acres of open space under the Project for the purposes of this analysis.						

This Alternative is analyzed since the reduced residential and commercial development could potentially reduce or eliminate one or more of the significant and unavoidable impacts related to air quality, greenhouse gases, and traffic under the proposed Project.

IMPACT COMPARISON TO THE PROPOSED PROJECT

Aesthetics, Light & Glare

On a short-term construction basis, the Reduced Density Alternative would require reduced building activities due a reduction in development onsite, with an associated reduction in the construction duration. Although the construction methodologies and equipment are generally expected to be the same, construction impacts associated with this Alternative would be reduced in comparison to the proposed Project.

The long-term visual character of the project site and its surroundings would be altered with the Reduced Density Alternative, although to a lesser degree than the proposed Project because the amount of residential and commercial development would be reduced by 50 percent. Comparatively, the less than significant impacts to visual character/quality and light and glare would be less than the Project, since this Alternative would result in a reduced visual mass and associated reduction in light and glare.

Thus, the less than significant long-term operational aesthetics/light and glare impacts identified under the proposed Project would be reduced under this Alternative. With respect to visual



resources, this Alternative is considered environmentally superior in comparison to the proposed Project.

Air Quality

Short-Term Impacts. Short-term air quality impacts from demolition, grading, paving, and construction activities would occur with the Reduced Density Alternative due to construction of the proposed buildings and improvements. The Project's regional construction-related emissions would exceed the SCAQMD regional NO_x threshold, resulting in a significant unavoidable impact. Additionally, the Project's localized construction-related emissions would exceed SCAQMD localized NO_x thresholds resulting in a significant unavoidable impact.

This Alternative would result in a reduction in site preparation activities and building activities, given the reduction in development that would occur. Under the Project, the regional SCAQMD NO_x threshold is exceeded by 108 percent, while the localized NO_x threshold is exceeded by 15 percent. While the 50 percent reduction in onsite development is not expected to eliminate the significant regional NO_x impact identified under the Project, it is anticipated that the localized NO_x impact would be eliminated.

Long-Term Impacts. Long-term air quality impacts from area and mobile source pollutant emissions would occur with the Reduced Density Alternative, although to a lesser degree than with the proposed Project. Emissions associated with this Alternative's area sources would be less than the proposed Project, given the reduction in development. It should be noted that due to a 50 percent decrease in residential and commercial development, and 50 percent decrease in Project-generated trips, a proportional decrease in air quality emissions would be expected for the Reduced Density Alternative. The proposed Project's long-term combined area and mobile source pollutant emissions would exceed SCAQMD ROG and NO_x thresholds, resulting in a significant unavoidable impact. Although emissions would be reduced under this Alternative, it is not expected that the reduction would lower emissions to below SCAQMD thresholds. The Project would exceed the SCAQMD ROG threshold by 126 percent and the NO_x threshold by 236 percent. Thus, this significant unavoidable Project impact would not be avoided.

The Reduced Density Alternative would be environmentally superior to the proposed Project regarding air quality impacts since it would result in a reduction in short-term construction and long-term operational air pollutant emissions. This Alternative would also eliminate the significant and unavoidable localized NO_x impact that would occur under the proposed Project. As such, the Reduced Density Alternative is considered environmentally superior in comparison to the proposed Project.

Biological Resources

Project implementation would result in less than significant impacts as the Project is currently developed and does not contain special status species. The Project's potential impacts to nesting and limited foraging habitats of raptors, owls, and passerines would be less than significant with mitigation incorporated.

Under the Reduced Density Alternative, the same amount of land disturbance would occur as the proposed Project. As such, the same amount of vegetation and trees would be affected, and impacts to raptors, owls, and passerines would be the same. Thus, this Alternative would



result in similar biological impacts as the proposed Project, and it would be neither environmentally superior nor inferior to the proposed Project.

Cultural Resources

The Project would result in significant and unavoidable impacts to historical resources as the Project involves the demolition/removal of eight historical resources. Mitigation measures have been identified that would result in the retention and rehabilitation of the Chapels Building and Assistant Superintendent's Residence. The proposed Project would have significant and unavoidable impacts to seven resources after implementation of mitigation. Archaeological and paleontological impacts were determined to be less than significant with mitigation.

The Reduced Density Alternative would result in impacts to the same historical resources as the proposed Project. In addition, the same grading and ground disturbing activities would occur, resulting in the same potential to impact buried archaeological and paleontological resources. As such, this Alternative is considered neither environmental superior nor inferior as compared to the proposed Project.

Geology and Soils

The soil erosion or loss of topsoil from grading and excavation operations that would occur with the proposed Project would be the same as the Reduced Density Alternative, since the same grading, earth moving, and construction methodology would be employed.

The Project site is susceptible to seismic, geologic, and soils related hazards. The Reduced Density Alternative would be subject to similar building standards and requirements as the proposed Project to minimize impacts related to geological hazards. As with the proposed Project, a less than significant long-term impact (with mitigation incorporated) would occur with this Alternative.

Since both short-term and long-term geology and soils impacts would be the same, the Reduced Density Alternative is considered neither environmentally superior nor inferior to the proposed Project.

Greenhouse Gas Emissions

As indicated in Table 5.6-1, Business As Usual Greenhouse Gas Emissions, Project implementation would result in 26,650.52 MTCO₂eq/yr (8.6 MTCO₂eq/yr per capita per year) which exceeds the 4.8 MTCO₂eq/yr per capita per year threshold. The Project's total mitigated GHG emissions would exceed the per capita threshold, resulting in a significant unavoidable impact. GHG emissions from construction and operational activities would also occur with the Reduced Density Alternative, although to a lesser degree (due to a reduction in intensity of construction activities and a 50 percent decrease in residential- and commercial-generated trips and operational emissions). The Project exceeds the identified per capita per year threshold (4.8 MTCO₂eq/yr) by 50 percent. With a 50 percent reduction in onsite development, it is anticipated that the significant and unavoidable impact associated with the Project's GHG emissions would be avoided and the threshold would not be exceeded. Thus, the Reduced Density Alternative would be environmentally superior to the proposed Project regarding GHG emissions.



Hazards and Hazardous Materials

Short-term construction-related impacts involving the potential for accidental release of hazardous materials would occur with the Reduced Density Alternative. Since the same grading, earth moving, and construction methodology would be employed under this Alternative, the same potential for encountering hazardous materials during the short-term construction process would exist. As such, short-term impacts under this Alternative would be similar to the proposed Project.

Additionally, long-term impacts involving the potential for hazards to the public or environment through the handling, storage, and/or use of hazardous materials, and accident conditions involving the release of hazardous materials, would be reduced with this Alternative, given the reduction in commercial and residential development.

As such, the Reduced Density Alternative would be environmentally superior to the proposed Project regarding hazardous materials impacts since long-term operational effects would be reduced in comparison to the Project. As such, this Alternative is considered environmental superior to the proposed Project.

Hydrology and Water Quality

The short-term impacts to water quality due to grading, excavation, and construction activities that would occur with the Project would also occur with the Reduced Density Alternative, as new development would occur. With this Alternative, these impacts would occur to the same degree, since the same grading, earth moving, and construction methodology would be employed.

Project implementation would increase the rate and amount of stormwater runoff, and change its quality, by development of impervious surfaces and new land uses. The Project's potential long-term hydrology and water quality impacts, which were concluded to be less than significant, would be reduced under this Alternative. This Alternative would result in a 50 percent reduction in development, with much of this undeveloped area resulting in additional open space and landscaping. This would reduce the total amount of impervious area and associated effects related to runoff and groundwater infiltration. In addition, the reduction in residential and commercial development would also reduce the potential sources for polluted runoff (i.e., chemicals, fertilizers, oils, lubricants, and other pollutants associated with typical commercial/residential uses). As such, long-term operational impacts would be reduced in comparison to the proposed Project.

This Alternative's long-term impacts related to hydrology and water quality would be reduced in comparison to the proposed Project. As such, the Reduced Density Alternative would be environmentally superior to the proposed Project in this regard.

Land Use and Planning

2012 RTP/SCS. The proposed Project is considered regionally significant since it is over SCAG's criteria of 500 dwelling units. Since the Reduced Density Alternative would only include a total of 375 dwelling units, it would no longer be considered regionally significant. As such, it would not be required to demonstrate consistency with the RTP/SCS Goals and growth forecasts and no impacts would occur in this regard. As with the proposed Project, this Alternative would not conflict with the 2012 RTP/SCS Goals and growth forecasts; refer to



Section 5.9, Land Use and Planning, for 2012 RTP/SCS Goals that are applicable to the Project.

Whittier General Plan. As with the proposed Project, this Alternative would require approval of a Specific Plan. Under the Alternative development scenario, the Specific Plan would have a maximum allowable development of 375 dwelling units and 104,175 square feet of commercial land uses, a 50 percent reduction in overall development. A Tentative Tract Map defining the property into legal parcels and lots would also be required. Given that this Alternative would be similar to the proposed Project in most regards, this Alternative is similarly anticipated to be consistent with the Whittier General Plan. However, according to Figure 4-1 of the General Plan Housing Element, the former Nelles facility is listed as a "housing opportunity site" that would assist the City in fulfilling its long-range goals for housing by providing a total of 710 dwelling units. Under the Reduced Density Alternative, only 375 units would be constructed onsite. Thus, this would not be consistent with the General Plan Housing Element.

WMC and WBSP. This Alternative would require Zoning Code and Zoning Map Amendments changing the existing zoning from Specific Plan (SP, Whittier Boulevard Specific Plan) to SP, Lincoln Specific Plan, as would be required with the proposed Project. This Alternative would still require Certificates of Appropriateness for structures built prior to 1941. As such, this Alternative is similarly anticipated to be consistent with the WMC.

Urban Decay. As noted in Section 5.9, Land Use and Planning, the Project would result in a less than significant impact in regards to urban decay. The Reduced Density Alternative assumes a 50 percent reduction in commercial building area as compared to the proposed Project. As such, the less than significant urban decay impacts that would occur with the proposed Project would occur also with this Alternative, although to a lesser degree. However, this Alternative would not accomplish the City's long-range goals for the creation of new commercial development within the Project area to satisfy current and projected demand for products and services. In addition, it would not replace antiquated commercial spaces that are prevalent along the Whittier Boulevard corridor with updated commercial facilities that meet contemporary user/tenant needs and provide seismically and energy compliant space in a highly accessible location.

This Alternative would be neither environmentally superior nor inferior to the proposed Project, since impacts associated with this Alternative would be greater in regards to General Plan consistency, but reduced in regards to urban decay.

Fiscal

Similar to the proposed Project, the Reduced Density Alternative would increase General Fund expenditures provided by the City. As this Alternative assumes a 50 percent reduction in residential and commercial development, General Fund revenues that would offset costs would be less than the proposed Project. This reduction in development may cause expenditures for City services provided to the Project to exceed Project revenues towards the City's General Fund. Based on Section 5.10, Fiscal Impacts, the Project is anticipated to result in a General Fund surplus of \$472,757 (a revenue/cost ratio of 1.45). While it can be assumed that both General Fund expenditures and revenues would be reduced in comparison to the proposed Project, it is not anticipated that the City's expenditures would be reduced to the same extent as revenues. Since the boundaries of the Project site would not change and infrastructure requirements would stay the same under this Alternative, the City's administrative governmental, financial, and public works expenditures would likely stay similar to those of the proposed Project. As such, it is anticipated that the City's revenue/cost ratio would be reduced



under this Alternative. Thus, the Reduced Density Alternative is considered environmental inferior to the proposed Project in this regard.

Noise

Short-term noise impacts from demolition, grading, and construction activities would occur with the Reduced Density Alternative due to construction of proposed buildings and improvements. The Project's construction-related noise impacts would not exceed the established noise standards, thus, resulting in a less than significant impact. With this Alternative, impacts related to grading, earth moving, and site preparation would be similar to the proposed Project since the same methodologies and equipment would be used. However, noise associated with building activities for this Alternative would be reduced since residential and commercial development would be reduced by 50 percent. Therefore, construction-related impacts are anticipated to be reduced in comparison to the proposed Project.

Long-term noise impacts from additional vehicular travel on the surrounding roadway network would occur with the Reduced Density Alternative. The Project's long-term noise impacts would be less than significant. Comparatively, this Alternative's mobile source noise impacts would be less than with the proposed Project, since this Alternative would result in a 50 percent reduction in residential and commercial trips. Therefore, the less than significant mobile source noise impacts identified under the proposed Project would be reduced under this Alternative.

Project implementation would result in less than significant impacts from stationary noise sources associated with the proposed Project, which would be typical of the surrounding residential and commercial uses. Comparatively, the stationary source noise impacts under the Reduced Density Alternative would be less than the proposed Project, given this Alternative would result in a 50 percent reduction of residential and commercial uses. Therefore, the less than significant stationary source noise impacts from residential uses, delivery trucks, mechanical equipment, parking areas, etc. that would occur with the proposed Project would occur also with this Alternative, although to a lesser degree.

The Reduced Density Alternative would be environmentally superior to the proposed Project regarding noise impacts due to decreased short-term and long-term noise levels.

Public Services and Recreation

The Reduced Density Alternative would result in similar increased demands for fire and police protection, schools, and parks and recreation facilities due to the new residential and commercial development that would occur. However, impacts related to these services would be reduced due to the Alternative's reduction in residential and commercial development by 50 percent. Therefore, the less than significant public services and recreation impacts identified under the proposed Project would be reduced under this Alternative. Thus, this Alternative is considered environmentally superior with respect to demands of public services and recreational facilities in comparison to the proposed Project.

Utilities and Service Systems

The Reduced Density Alternative would result in demand for a similar range of utilities and service systems as the proposed Project (water supply and conveyance facilities, wastewater treatment and sewer infrastructure, solid waste disposal, and dry utilities) since new land uses would be developed. The Project's impacts to utilities and service systems would be less than



significant with mitigation incorporated. This Alternative’s impacts to utilities and service systems would be reduced compared the proposed Project, given this Alternative involves a 50 percent reduction in residential and commercial development. Therefore, the less than significant (with mitigation incorporated) impacts to utilities and service systems that would occur with the proposed Project would occur also with this Alternative, but to a lesser degree. Thus, the Reduced Density Alternative would be environmentally superior to the proposed Project regarding impacts to utilities and service systems, since less residential and commercial development would occur compared to the proposed Project.

Transportation and Traffic

The Reduced Density Alternative would generate additional vehicular trips beyond existing conditions. However, these trips would occur to a lesser degree than with the Project, since the overall amount of residential and commercial development onsite would be reduced by 50 percent. Operational impacts would be reduced as a result of the lower development intensity. *Table 7-2, Comparison of Proposed Project and Reduced Density Alternative ADT*, presents the forecast daily traffic volumes for the Reduced Density Alternative for a typical weekday, and indicates this Alternative is forecast to generate approximately 10,166 ADT. Therefore, this Alternative would have 10,164 fewer daily trips than the proposed Project.

**Table 7-2
Comparison of Proposed Project and
Reduced Density Alternative ADT**

Land Use	Trip Generation Rate	DU	SF	Average Daily Trips ²
PROPOSED PROJECT				
Single-Family Residential	9.52	187		1,513
Multi-Family Condominiums Residential	8.00	267		1,815
Apartments	6.65	296		1,673
Commercial	Various ¹		208,350	15,329
Total Proposed Project Trips				20,330
REDUCED DENSITY ALTERNATIVE				
Single-Family Residential	9.52	93		753
Multi-Family Condominiums Residential	8.00	134		911
Apartments	6.65	148		837
Commercial (30% Reduction) ³	Various ¹		104,175	7,665
Total Reduced Density Alternative Trips				10,166
Net Reduction Average Daily Trips				-10,164
Net Reduction Average Daily Trips %				-50%
Notes:				
1. The various trip generation rates for the commercial land uses are shown in <i>Appendix 11.16, Traffic Impact Analysis</i> .				
2. ADTs account for ITE 15% daily internal trip capture reductions.				
3. For the purposes of this analysis, this Alternative assumes a 50% reduction in total Project-generated commercial trips, assuming the same ratio of commercial trip generation types.				
4. Numbers in table may vary slightly due to rounding.				



Under the proposed Project, a number of local and regional transportation facilities were determined to be significantly impacted due to Project trip generation. While this Alternative may reduce traffic levels at one or more of these identified facilities, the majority of these facilities are located outside of the City of Whittier and/or would be mitigated through improvements partially funded by the Project Applicant through a fair share payment. The timing for implementation of the mitigation measures would be determined based on traffic monitoring used in conjunction with buildout of the Project, and/or further consultation with affected agencies. As with the proposed Project, until implementation of the mitigation measures, impacts to the local/regional transportation system would remain a significant and unavoidable impact. Thus, the significant and unavoidable impacts to City, County, State Highway, and Congestion Management Program facilities is expected to remain under the Reduced Density Alternative.

The Reduced Density Alternative would be environmentally superior to the proposed Project regarding transportation and traffic impacts due to decreased traffic volumes. However, the significant and unavoidable impacts to local and regional transportation facilities in the area would remain.

ABILITY TO MEET PROJECT OBJECTIVES

The majority of Project objectives would either not be accomplished or would be accomplished to a lesser degree under the Reduced Density Alternative. This Alternative would not deliver a mix of residential/commercial/recreational land uses to the same degree as the Project, since residential and commercial development would be reduced by 50 percent. This Alternative would reduce the revenue provided to the City's General Fund, and could potentially result in the City's expenditures being greater than General Fund revenues. The range of housing types and diversity of architectural design provided under this Alternative would be limited, given that the number of dwelling units would be reduced by 50 percent. Given the reduced amount of development and increased areas of open space, landscaping, and hardscapes, connectivity between various land uses would be diminished. This Alternative would not implement the General Plan Housing Element's long-range plan for residential development at the site, given the reduction in dwelling units that would occur. The range of housing opportunities provided at the least cost possible and serving a diverse population would not be accomplished to the same extent, since 375 fewer dwelling units would be constructed. In addition, the Reduced Density Alternative would not promote internal trip capture and reduce vehicle miles traveled to the same extent, since the reduced residential/commercial development would diminish the mixed-use benefits identified under the proposed Project.

Given that the majority of benefits identified under the proposed Project would either not be accomplished or would be accomplished to a lesser degree, this Alternative has been rejected from further consideration by the City.

7.3 “REDUCED DENSITY/ADDITIONAL HISTORIC PRESERVATION” ALTERNATIVE

DESCRIPTION OF ALTERNATIVE

The proposed Project would include the adaptive reuse of the Superintendent's Residence and the Administration Building in their existing locations onsite. As noted in [Section 5.4](#), the EIR



recommends mitigation that would also require the reuse of the Chapels Building in its current location, and the onsite relocation and reuse of the Assistant Superintendent’s Residence.

The “Reduced Density/Additional Historic Preservation” Alternative would involve a reduction in development and an increase in the number of buildings adaptively reused in comparison to the proposed Project. The types of proposed land uses would be similar to the proposed Project (residential, commercial, and open space). The boundaries of the 76-acre Project site would remain the same. Although the configuration and/or development intensity may vary widely for such an alternative, for the purposes of this analysis the Reduced Density/Additional Historic Preservation Alternative would consist of the adaptive reuse of an additional two historic structures (the Auditorium and the Gymnasium) in their existing locations as part of the proposal. Thus, the Project would include the adaptive reuse of a total of six historic structures onsite, as opposed to the adaptive reuse of the four historic structures onsite with the proposed Project.

The Auditorium and Gymnasium are situated within Planning Area 1 of the Specific Plan (“The Market”), and thus are assumed to be retained and adaptively reused as a commercial, retail, or community facility. As the adaptive reuse of the additional two historic structures would result in a reduction of site area available for new construction (i.e., a reduction in available land area and constraints on site grading for new commercial development), this alternative assumes the overall commercial building area in Planning Area 1 would be reduced by 30 percent (i.e., commercial building area would be reduced to 145,845 square feet, inclusive of the adaptively reused Auditorium and Gymnasium); refer to Table 7-3, Comparison of Proposed Project and Reduced Density/Additional Historic Preservation Alternative. The overall acreages associated with Planning Areas 1 and 2 would remain the same. The remaining areas of the Project site would be similar to the proposed Project.

**Table 7-3
Comparison of Proposed Project and
Reduced Density/Additional Historic Preservation Alternative**

Description	Single-Family Res. (DU) ¹	Multi-Family Res. (DU)	Commercial: (SF)	Open Space/ Rec. (Acres)	Roads (Acres)	TOTAL (DU)	TOTAL (SF)
Proposed Project	187	563	208,350	4.6	11.4	750	208,350
Reduced Density/Additional Historic Preservation Alternative	187	563	145,845	4.6	11.4	750	145,845
<i>Difference</i>	<i>0</i>	<i>0</i>	<i>-62,505</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>-62,505</i>
<i>% Difference</i>	<i>0</i>	<i>0</i>	<i>-30%</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>-30%</i>

This Alternative is considered since it could potentially eliminate or reduce the significant and unavoidable impacts under the Project for historical resources, since it would result in the additional adaptive reuse of two buildings. In addition, the reduction in commercial building area could potentially eliminate or reduce the significant and unavoidable impacts related to air quality, greenhouse gases, and traffic.



IMPACT COMPARISON TO THE PROPOSED PROJECT

Aesthetics, Light & Glare

On a short-term construction basis, the Reduced Density/Additional Historic Preservation Alternative would require a similar range of grading and building activities as the Project. While the amount of new construction would be slightly reduced due to the adaptive reuse of two additional structures, substantial building rehabilitation activities would be required for the Auditorium and Gymnasium. As such, construction-related aesthetics impacts are expected to be similar to the proposed Project.

The long-term visual character of the project site and its surroundings would be altered with the Reduced Density/Additional Historic Preservation Alternative, although to a lesser degree than the proposed Project because the commercial building area would be reduced to preserve two additional historic structures. Comparatively, the less than significant impacts to visual character/quality, and light and glare would be less than the Project, since this Alternative would result in a reduced visual mass and associated reduction in light and glare.

Thus, the less than significant construction-related and long-term operational aesthetics/light and glare impacts identified under the proposed Project would be reduced under this Alternative. With respect to visual resources, this Alternative is considered environmentally superior in comparison to the proposed Project.

Air Quality

Short-Term Impacts. Short-term air quality impacts from demolition, grading, paving, and construction activities would occur with the Reduced Density/Additional Historic Preservation Alternative due to construction of the proposed buildings and improvements. The Project's regional construction-related emissions would exceed the SCAQMD regional NO_x threshold, resulting in a significant unavoidable impact. Additionally, the Project's localized construction-related emissions would exceed SCAQMD localized NO_x thresholds resulting in a significant unavoidable impact.

While this Alternative would reduce short-term air quality impacts due to a slightly decreased grading footprint, it is not anticipated that emissions would be reduced to the extent that the significant and unavoidable impacts under the Project would no longer occur. Under the Project, the regional SCAQMD NO_x threshold is exceeded by 108 percent, while the localized NO_x threshold is exceeded by 15 percent. The anticipated reduction in short-term pollutant emissions during construction under this Alternative is expected to be nominal; thus, the significant and unavoidable impacts identified under the Project are still expected to occur.

Long-Term Impacts. Long-term air quality impacts from area and mobile source pollutant emissions would occur with the Reduced Density/Additional Historic Preservation Alternative, although to a lesser degree than with the proposed Project. Emissions associated with this Alternative's area sources would be less than the proposed Project, given the reduction in development. It should be noted that due to a 30 percent decrease in the commercial area (145,845 square feet), and 30 percent decrease in commercial Project-generated trips, a proportional decrease in air quality emissions would be expected for the Reduced Density/Additional Historic Preservation Alternative. The proposed Project's long-term combined area and mobile source pollutant emissions would exceed SCAQMD ROG and NO_x thresholds, resulting in a significant unavoidable impact. Although emissions would be reduced under this



Alternative, it is not expected that the reduction would lower emissions to below SCAQMD thresholds. The Project would exceed the SCAQMD ROG threshold by 126 percent and the NO_x threshold by 236 percent. Thus, this significant unavoidable Project impact would not be avoided.

The Reduced Density/Additional Historic Preservation Alternative would be environmentally superior to the proposed Project regarding air quality impacts since it would result in a minor reduction in short-term construction and long-term operational air pollutant emissions. Thus, the Reduced Density/Additional Historic Preservation Alternative is considered environmentally superior in comparison to the proposed Project. Although short-term construction and long-term operational impacts would be reduced under this Alternative, it is not anticipated that the significant and unavoidable impacts identified under the proposed Project would be avoided.

Biological Resources

Project implementation would result in less than significant impacts as the Project is currently developed and does not contain special status species. The Project's potential impacts to nesting and limited foraging habitats of raptors, owls, and passerines would be less than significant with mitigation incorporated.

Under the Reduced Density/Additional Historic Preservation Alternative, construction activities would occur over a smaller grading footprint with a reduction of 30 percent of overall commercial square footage at 145,845 square feet instead of 208,350 square feet with the proposed Project. Although site grading would be slightly reduced since two fewer buildings would be demolished, it is anticipated that the rehabilitation of the Auditorium and Gymnasium would require disturbance of any vegetation immediately surrounding each structure for construction access, equipment, utilities, hardscapes, and landscaping. As such, this Alternative would result in similar biological impacts as the proposed Project, and it would be neither environmentally superior nor inferior to the proposed Project.

Cultural Resources

The Project would result in significant and unavoidable impacts to historical resources as the Project involves the demolition/removal of eight historical resources. Mitigation measures have been identified that would result in the retention and rehabilitation of the Chapels Building and Assistant Superintendent's Residence. The proposed Project would have significant and unavoidable impacts to seven resources after implementation of mitigation. Archaeological and paleontological impacts were determined to be less than significant with mitigation.

Under the Reduced Density/Additional Historic Preservation Alternative, two additional historical resources (the Auditorium and the Gymnasium) would be adaptively reused and impacts to historical resources would be reduced in comparison to the proposed Project. However, the reduction in impacts to historical resources that would be achieved by this Alternative would not be sufficient to avoid significant and unavoidable impacts to historical resources, since four historically-significant resources onsite would still be adversely affected.

Under the Reduced Density/Additional Historic Preservation Alternative, slightly less grading and excavation would occur due to the retention and adaptive reuse of two additional historic buildings. As such, the Project's potential impacts to archaeological and paleontological resources which would be less than significant with mitigation incorporated would be reduced



under this Alternative. Additionally, this Alternative would result in a less than significant impact in the potential for disturbing human remains, similar to the proposed Project.

The Reduced Density/Additional Historic Preservation Alternative would be environmentally superior to the proposed Project regarding potential impacts to cultural resources, given it would involve slightly less ground-disturbing activities and an increase in adaptive reuse of historical resources within a smaller grading footprint. It should be noted, however, that the retention and reuse of the Auditorium and Gymnasium is not considered feasible for economic reasons; refer to the *Ability to Meet Project Objectives* subsection, below.

Geology and Soils

The soil erosion or loss of topsoil from grading and excavation operations that would occur with the proposed Project would also occur with the Reduced Density/Additional Historic Preservation Alternative, as new development would occur. However, with this Alternative, these impacts would occur to a lesser degree than with the proposed Project, given this Alternative would slightly reduce the grading footprint during construction. As with the proposed Project, less than significant impacts would occur with this Alternative following compliance with the established regulatory framework.

The Project site is susceptible to seismic, geologic, and soils related hazards. The Reduced Density/Additional Historic Preservation Alternative would be subject to similar building standards and requirements as the proposed Project to minimize impacts related to geological hazards. Although the adaptive reuse of existing onsite structures would be subject to the California Historic Building Code (which provides for alternative building regulations in recognition of unique construction issues inherent to historic buildings), the California Historic Building Code still requires building and safety measures to minimize impacts related to geological hazards. As with the proposed Project, a less than significant long-term impact (with mitigation incorporated) would occur with this Alternative.

The Reduced Density/Additional Historic Preservation Alternative would be environmentally superior to the proposed Project, since it would result in a reduced potential for erosion and loss of topsoil. Long-term impacts related to geological hazards would be similar to the proposed Project.

Greenhouse Gas Emissions

As indicated in Table 5.6-1, *Business As Usual Greenhouse Gas Emissions*, Project implementation would result in 26,650.52 MTCO₂eq/yr (8.6 MTCO₂eq/yr per capita per year) which exceeds the 4.8 MTCO₂eq/yr per capita per year threshold. The Project's total mitigated GHG emissions would exceed the per capita threshold, resulting in a significant unavoidable impact. GHG emissions from construction and operational activities would also occur with the Reduced Density/Additional Historic Preservation Alternative, although to a lesser degree (due to a reduction in intensity of construction activities and an approximately 30 percent decrease in commercial Project-generated trips and operational emissions). Although GHG emissions would be reduced, the Project exceeds the identified per capita per year threshold (4.8 MTCO₂eq/yr) by 50 percent. The reduction of GHG associated with this Alternative is not anticipated to eliminate this significant impact.



The Reduced Density/Additional Historic Preservation Alternative would be environmentally superior to the proposed Project regarding GHG emissions, since a slight reduction in short-term construction-related and long-term operational emissions would occur.

Hazards and Hazardous Materials

Short-term construction-related impacts involving the potential for accidental release of hazardous materials would occur with the Reduced Density/Additional Historic Preservation Alternative. The Project's less than significant impacts (with mitigation incorporated) involving accidental release of hazardous materials from construction activities would be reduced with this Alternative, due to less site disturbance and demolition activities. However, the adaptive reuse of the Auditorium and Gymnasium would involve rehabilitation activities that would require alteration to the structures (resulting in potential impacts related to asbestos, lead-based paints, and other hazards) and soil disturbance immediately surrounding each building. As such, short-term construction related impacts would be similar to the proposed Project.

Additionally, long-term impacts involving the potential for hazards to the public or environment through the handling, storage, and/or use of hazardous materials, and accident conditions involving the release of hazardous materials, would be reduced with this Alternative, given the reduction in commercial development.

The Reduced Density/Additional Historic Preservation Alternative would be environmentally superior to the proposed Project regarding long-term impacts due to potential for hazards to the public or environment through the handling, storage, and/or use of hazardous materials, and conditions involving the release of hazardous materials, given this Alternative involves a smaller amount of commercial development.

Hydrology and Water Quality

The short-term impacts to water quality due to grading, excavation, and construction activities that would occur with the Project would also occur with the Reduced Density/Additional Historic Preservation Alternative, as new development would occur. With this Alternative, these impacts would occur to a lesser degree than with the proposed Project, given this Alternative involves a smaller grading footprint and smaller amount of area that would be disturbed by grading (and exposed to erosion). As with the proposed Project, less than significant short-term impacts to water quality would occur with this Alternative following compliance with the established regulatory framework.

Project implementation would increase the rate and amount of stormwater runoff, and change its quality, by development of impervious surfaces and new land uses. The Project's potential long-term hydrology and water quality impacts, which were concluded to be less than significant, would be similar with this Alternative. The reduction in impervious areas associated with this Alternative is expected to be minor, given the improvements and hardscape that would be required immediately surrounding the Auditorium and Gymnasium as part of adaptive reuse. Additionally, inclusion of onsite detention within the Project's stormwater drainage design to ensure the Project's drainage impacts are reduced to less than significant, would be similar with this Alternative. This Alternative would be subject to compliance with the established regulatory framework, which requires that an adequate stormwater drainage system be designed and constructed with the inclusion of onsite detention.



Project implementation would increase demands on groundwater resources through development of new land uses. These Project impacts to groundwater resources, which were concluded to be less than significant, would occur also with the Reduced Density/Additional Historic Preservation Alternative, as new development would occur. This Alternative would not result in a substantive change in impacts related to groundwater when compared to the proposed Project, since the amount of impervious area onsite is expected to generally remain the same.

This Alternative's long-term operational hydrology/water quality impacts and groundwater impacts would be similar to the proposed Project. However, short-term impacts would be slightly reduced due to the reduced amount of grading that would be required. As such, the Reduced Density/Additional Historic Preservation Alternative would be environmentally superior to the proposed Project regarding hydrology and water quality.

Land Use and Planning

2012 RTP/SCS. Similar to the proposed Project, the Reduced Density/Additional Historic Preservation Alternative would be considered regionally significant. It must therefore demonstrate consistency with the 2012 RTP/SCS. Given that this Alternative would reduce commercial development capacity as compared to the proposed Project, this Alternative is anticipated to be consistent with the 2012 RTP/SCS Goals and growth forecasts; refer to Section 5.9, Land Use and Planning, for 2012 RTP/SCS Goals that are applicable to the Project.

Whittier General Plan. As with the proposed Project, this Alternative would require approval of a Specific Plan. Under the Alternative development scenario, the Specific Plan would have a maximum allowable development of 750 dwelling units and 145,845 square feet of commercial land uses, a 30 percent reduction in commercial development. A Tentative Tract Map defining the property into legal parcels and lots would also be required. Given that this Alternative would be similar to the proposed Project in most regards, this Alternative is similarly anticipated to be consistent with the Whittier General Plan.

WMC and WBSP. This Alternative would require Zoning Code and Zoning Map Amendments changing the existing zoning from Specific Plan (SP, Whittier Boulevard Specific Plan) to SP, Lincoln Specific Plan, as would be required with the proposed Project. This Alternative would still require Certificates of Appropriateness for structures built prior to 1941. As such, this Alternative is similarly anticipated to be consistent with the WMC.

Urban Decay. As noted in Section 5.9, Land Use and Planning, the Project would result in a less than significant impact in regards to urban decay. The Reduced Density/Additional Historic Preservation Alternative assumes a 30 percent reduction in commercial building area as compared to the proposed Project. As such, the less than significant urban decay impacts that would occur with the proposed Project would occur also with this Alternative, although to a lesser degree. However, this Alternative would not accomplish the City's long-range goals for the creation of new commercial development within the Project area to satisfy current and projected demand for products and services. In addition, it would not replace antiquated commercial spaces that are prevalent along the Whittier Boulevard corridor with updated commercial facilities that meet contemporary user/tenant needs and provide seismically and energy compliant space in a highly accessible location.



This Alternative would be environmentally superior to the proposed Project in regards to land use and planning, since impacts related to urban decay would be slightly reduced due to a 30 percent reduction in commercial development.

Fiscal

Similar to the proposed Project, the Reduced Density/Additional Historic Preservation Alternative would increase General Fund expenditures provided by the City. As this Alternative assumes a 30 percent reduction in commercial square footage, General Fund revenues that would offset costs would be less than the proposed Project. While this Alternative would reduce revenue realized by the City, it is not expected that this reduction would cause General Fund expenditures to exceed revenues. Based on Section 5.10, *Fiscal Impacts*, the Project is anticipated to result in a General Fund surplus of \$472,757 (a revenue/cost ratio of 1.45). Even when assuming a conservative reduction of 30 percent across all General Fund revenues, and no reduction in General Fund costs to the City, this Alternative would still result in surplus of \$18,169 (a revenue/cost ratio of 1.02). Therefore, the Project's less than significant fiscal impacts that would occur with the proposed Project would occur also with this Alternative, although to a greater degree.

The Reduced Density/Additional Historic Preservation Alternative would be environmentally inferior to the proposed Project regarding fiscal impacts due to a decrease in revenues.

Noise

Short-term noise impacts from demolition, grading, and construction activities would occur with the Reduced Density/Additional Historic Preservation Alternative due to construction of proposed buildings and improvements. The Project's construction-related noise impacts would not exceed the established noise standards, thus, resulting in a less than significant impact. Comparatively, this Alternative would result in a slightly reduced amount of grading and building activities, since two additional historic structures would be retained in place. However, these two buildings would require both interior and exterior rehabilitation activities prior to adaptive reuse; as such, any difference in short-term noise associated with two structures would be negligible. Therefore, construction-related impacts are anticipated to be similar to the proposed Project.

Long-term noise impacts from additional vehicular travel on the surrounding roadway network would occur with the Reduced Density/Additional Historic Preservation Alternative. The Project's long-term noise impacts would be less than significant. Comparatively, this Alternative's mobile source noise impacts would be less than with the proposed Project, since this Alternative would result in an approximately 30 percent decrease in commercial Project-generated ADT. Therefore, the less than significant mobile source noise impacts identified under the proposed Project would be reduced under this Alternative.

Project implementation would result in less than significant impacts from stationary noise sources associated with the proposed Project, which would be typical of the surrounding residential and commercial uses. Comparatively, the stationary source noise impacts under the Reduced Density/Additional Historic Preservation Alternative would be slightly less than the proposed Project, given this Alternative would have a smaller grading footprint as the proposed Project with a 30 percent reduction of commercial uses. Therefore, the less than significant stationary source noise impacts from residential uses, delivery trucks, mechanical equipment,



parking areas, etc. that would occur with the proposed Project would occur also with this Alternative, although to a lesser degree.

The Reduced Density/Additional Historic Preservation Alternative would be environmentally superior to the proposed Project regarding noise impacts due to decreased short-term and long-term noise levels.

Public Services and Recreation

The Reduced Density/Additional Historic Preservation Alternative would result in similar increased demands for fire and police protection, schools, and parks and recreation facilities because 750 dwelling units and 145,845 square feet of commercial land uses would be developed and increased calls for service would occur. However, impacts related to these services would be reduced due to the Alternative's reduction in commercial building area by 30 percent and increase in adaptively reusing two additional historical structures. Therefore, the less than significant public services and recreation impacts identified under the proposed Project would be reduced under this Alternative. Thus, this Alternative is considered environmentally superior with respect to demands of public services and recreational facilities in comparison to the proposed Project.

Utilities and Service Systems

The Reduced Density/Additional Historic Preservation Alternative would result in demand for a similar range of utilities and service systems as the proposed Project (water supply and conveyance facilities, wastewater treatment and sewer infrastructure, solid waste disposal, and dry utilities) since new land uses would be developed. The Project's impacts to utilities and service systems would be less than significant with mitigation incorporated. This Alternative's impacts to utilities and service systems would be reduced compared the proposed Project, given this Alternative involves a 30 percent reduction in commercial building area and an increase in adaptively reusing two additional historical structures. Therefore, the less than significant (with mitigation incorporated) impacts to utilities and service systems that would occur with the proposed Project would occur also with this Alternative, but to a lesser degree. It should be noted that the adaptive reuse of the Auditorium and Gymnasium would result in the reuse of buildings that are less energy efficient than new construction (e.g., building insulation/materials, heating/ventilation/air conditioning, and other constraints on energy efficient features due to the historical nature of the buildings). Despite this constraint on energy efficiency, the Reduced Density/Additional Historic Preservation Alternative would be environmentally superior to the proposed Project regarding impacts to utilities and service systems, since less 30 percent less commercial development would occur compared to the proposed Project.

Transportation and Traffic

The Reduced Density/Additional Historic Preservation Alternative would generate additional vehicular trips beyond existing conditions. However, these trips would occur to a lesser degree than with the Project, since the overall commercial building area in Planning Area 1 would be reduced by 30 percent. Operational impacts would be reduced as a result of the lower development intensity. Table 7-4, Comparison of Proposed Project and Reduced Density/Additional Historic Preservation Alternative ADT, presents the forecast daily traffic volumes for the Reduced Density/Additional Historic Preservation Alternative for a typical



weekday, and indicates this Alternative is forecast to generate approximately 15,731 ADT. Therefore, this Alternative would have 4,599 fewer daily trips than the proposed Project.

**Table 7-4
Comparison of Proposed Project and
Reduced Density/Additional Historic Preservation Alternative ADT**

Land Use	Trip Generation Rate	DU	SF	Average Daily Trips ²
PROPOSED PROJECT				
Single-Family Residential	9.52	187		1,513
Multi-Family Condominiums Residential	8.00	267		1,815
Apartments	6.65	296		1,673
Commercial	Various ¹		208,350	15,329
Total Proposed Project Trips				20,330
REDUCED DENSITY/ADDITIONAL HISTORIC PRESERVATION ALTERNATIVE				
Single-Family Residential	9.52	187		1,513
Multi-Family Condominiums Residential	8.00	267		1,815
Apartments	6.65	296		1,673
Commercial (30% Reduction) ³	Various ¹		145,845	10,730
Total Reduced Density/ Additional Historic Preservation Alternative Trips				15,731
Net Reduction Average Daily Trips				-4,599
Net Reduction Average Daily Trips %				-23%
Notes:				
1. The various trip generation rates for the commercial land uses are shown in Appendix 11.16, Traffic Impact Analysis .				
2. ADTs account for ITE 15% daily internal trip capture reductions.				
3. For the purposes of this analysis, this Alternative assumes a 30% reduction in total Project-generated commercial trips, assuming the same ratio of commercial trip generation types.				
4. Numbers in table may vary slightly due to rounding.				

Under the proposed Project, a number of local and regional transportation facilities were determined to be significantly impacted due to Project trip generation. While this Alternative may reduce traffic levels at one or more of these identified facilities, the majority of these facilities are located outside of the City of Whittier and/or would be mitigated through improvements partially funded by the Project Applicant through a fair share payment. The timing for implementation of the mitigation measures would be determined based on traffic monitoring used in conjunction with buildout of the Project, and/or further consultation with affected agencies. As with the proposed Project, until implementation of the mitigation measures, impacts to the local/regional transportation system would remain a significant and unavoidable impact. Thus, the significant and unavoidable impacts to City, County, State Highway, and Congestion Management Program facilities is expected to remain under the Reduced Density/Additional Historic Preservation Alternative.

The Reduced Density/Additional Historic Preservation Alternative would be environmentally superior to the proposed Project regarding transportation and traffic impacts due to decreased average daily traffic volumes. However, the significant and unavoidable impacts to local and regional transportation facilities in the area would remain.



ABILITY TO MEET PROJECT OBJECTIVES

The Reduced Density/Additional Historic Preservation Alternative would accomplish the Project objectives, although several would be to a different degree than the proposed Project. The Alternative would fulfill the Applicant's objectives to provide a mix of land uses including residential, commercial and recreational elements, to a lesser degree than the Project since 30 percent less commercial square footage would be developed. This Alternative would also fulfill the objective of generating net revenue for the City's General Fund, but not to the same extent as the proposed Project given the reduced amount of commercial development. The objective to reuse existing building materials on site when economically feasible and providing for diversity in architectural design along with traditional design elements would be accomplished to a greater extent, since two additional historic structures would be retained in place and adaptively reused.

However, it should be noted that this Alternative is not considered feasible due to economic reasons. The Reuse Feasibility Study included a detailed review of economic feasibility through market, construction cost, and subsidy analyses. When comparing the costs of retention in place and restoration to the costs associated with new construction, it was determined that the retention/restoration costs far exceed the costs of new construction. This increased cost is due to a number of factors, including substantially greater subsidy costs through structural improvements, upgrades for code compliance, and interior and exterior repairs. Adaptive reuse of these buildings would also result in lost land revenue that would otherwise have been realized through new construction. The increased costs associated with adaptive reuse of the Auditorium and Gymnasium, as described in the Reuse Feasibility Study, are as follows:¹²

1. Auditorium: When comparing the cost of restoration of the Auditorium to new construction, restoration would result in a net loss of \$39,363 (rehabilitation costs would be three percent greater than new construction). When considering reuse subsidies (and accounting for historic tax credits), restoration would incur a -47.6 percent return on costs. In addition, the market value of land displaced by the restored Auditorium would have a value of between \$390,600 and \$1,631,400 that would not be realized under this Alternative.
2. Gymnasium: When comparing the cost of restoration of the Gymnasium to new construction, restoration would result in a net loss of \$1,419,602 (rehabilitation costs would be 81 percent greater than new construction). When considering reuse subsidies (and accounting for historic tax credits), restoration would incur a -9.7 percent return on costs. In addition, the market value of land displaced by the restored Gymnasium would have a value of \$1,253,000 that would not be realized under this Alternative.

As noted above, retention and rehabilitation of the Auditorium and Gymnasium would be infeasible for economic reasons. The economic losses expected to be incurred would reduce profitability such that it would make this Alternative infeasible, since it would fail to attract capital investment in a competitive market environment.¹³ Thus, the Reduced Density/Additional Historic Preservation Alternative would not be a feasible alternative to the proposed Project.

¹² Ibid.

¹³ EPS, *Reuse Feasibility Study, Nelles Correctional Facility Redevelopment*, August 11, 2014.



7.4 “AGE RESTRICTED RESIDENTIAL” ALTERNATIVE

DESCRIPTION OF ALTERNATIVE

The “Age Restricted Residential” Alternative would be the same as the proposed Project in every respect, except one: this Alternative would include an age restricted residential component. For the purposes of this analysis, this Alternative assumes one-half of the high-density residential uses (148 apartments) within Planning Area 7 in the northwestern portion of the site would be dedicated to age restricted housing. The site plan, impact footprint, development intensity, architecture and design characteristics, landscaping, and ancillary infrastructure improvements of the proposed Project would remain the same.

Age restricted housing results in a lower vehicle trip generation as opposed to standard non-age restricted housing. This lower trip generation may have the potential to reduce or eliminate the significant and unavoidable impacts related to traffic, air quality, and greenhouse gases that were identified under the proposed Project.

As indicated in Table 7-5, Comparison of Proposed Project and Age Restricted Residential Alternative, this Alternative involves similar land uses as the Project, including residential, commercial, and open space recreational uses.

**Table 7-5
Comparison of Proposed Project and
Age Restricted Residential Alternative**

Description	Single-Family Res. (DU)	Multi-Family Condominiums Res. (DU)	Multi-Family Apartments Res. (DU)	Multi-Family Age Restricted Apartments Res. (DU)	Commercial (SF)	Open Space/ Rec. (Acres)	Roads (Acres)	TOTAL (DU)	TOTAL (SF)
Proposed Project	187	267	296	0	208,350	4.6	11.4	750	208,350
Age Restricted Residential Alternative	187	267	148	148	208,350	4.6	11.4	750	208,350
<i>Difference</i>	0	0	-148	+148	0	0	0	0	0
<i>% Difference</i>	0%	0%	-50%	+100%	0%	0%	0%	0%	0%

IMPACT COMPARISON TO THE PROPOSED PROJECT

Aesthetics, Light & Glare

The Age Restricted Residential Alternative would feature the same construction practices, impact area, building heights, architecture, lighting, landscaping, and design characteristics as the proposed Project. The short-term visual impacts associated with demolition, grading, and construction activities that would occur with the proposed Project would similarly occur with the Age Restricted Residential Alternative.

As with the proposed Project, the long-term visual character of the Project site and its surroundings would be altered with the Age Restricted Residential Alternative, since this



Alternative would include the same structures, visual massing, hardscape, lighting, and landscape treatments as the proposed Project.

Thus, the less than significant construction-related and long-term operational aesthetics/light and glare impacts identified under the proposed Project would be similar under this Alternative. Thus, this Alternative is considered neither environmentally superior nor inferior in comparison to the proposed Project.

Air Quality

Short-Term Impacts. The Age Restricted Residential Alternative would result in the same construction practices, equipment, and impact area as the proposed Project. Short-term air quality impacts from demolition, grading, paving, and construction activities would occur with the Age Restricted Residential Alternative due to construction of the proposed buildings and improvements, and the pollutant emissions would be the same as the Project. Thus, the significant and unavoidable short-term impacts related to regional NO_x emissions, localized NO_x emissions, and cumulative construction emissions would not be avoided.

Long-Term Impacts. Long-term air quality impacts from area and mobile source pollutant emissions would occur with the Age Restricted Residential Alternative, although to a lesser degree than with the proposed Project. Emissions associated with this Alternative's area sources would be similar than the proposed Project, given the development footprint would be the same. Long-term operational emissions related to vehicular trips would be reduced in comparison to the Project, since age restricted residential uses have a lower trip generation rate than non-age restricted residential uses (refer to the *Transportation and Traffic* analysis for this Alternative, below).

This Alternative would result in slightly fewer vehicle trips as compared to the proposed Project, as this Alternative would result in 19,927 ADT. This represents a decrease of 403 ADT or approximately 2 percent less than the proposed Project. The Project's long-term combined area and mobile source pollutant emissions would exceed SCAQMD ROG and NO_x thresholds, resulting in a significant unavoidable impact. Although emissions would be reduced under this Alternative, it is not expected that the reduction would lower emissions to below SCAQMD thresholds. The Project would exceed the SCAQMD ROG threshold by 126 percent and the NO_x threshold by 236 percent. Thus, this significant unavoidable Project impact would not be avoided.

The Age Restricted Residential Alternative would be environmentally superior to the proposed Project regarding air quality impacts since it would result in a reduction in long-term operational air pollutant emissions. Thus, the Age Restricted Residential Alternative is considered environmentally superior in comparison to the proposed Project. However, it would not eliminate the significant and unavoidable air quality impacts identified under the proposed Project.

Biological Resources

As noted above, the Age Restricted Residential Alternative would result in the same site plan, impact area, and construction practices as the proposed Project. Under this Alternative, construction activities would occur over the same development footprint as the proposed Project. As with the proposed Project, no impact to riparian habitats, sensitive vegetation communities, wetlands, or jurisdictional waters would occur with this Alternative. The Project's potential impacts to nesting and limited foraging habitats of raptors, owls, and passerines, which



would be less than significant with mitigation incorporated, would be similar with this Alternative. Thus, this Alternative would be neither environmentally superior nor inferior in comparison to the proposed Project.

Cultural Resources

Since the impact area and construction methodology associated with the Age Restricted Residential Alternative would be the same as the proposed Project, the short-term archaeological and paleontological impacts associated with demolition, grading, and construction activities that would occur with the proposed Project would similarly occur with this Alternative. The significant and unavoidable impacts to historical resources that would occur with the proposed Project would similarly occur with the Age Restricted Residential Alternative, since the same historic resources would be demolished.

The Age Restricted Residential Alternative would be neither environmentally superior nor inferior in comparison to the proposed Project regarding potential impacts to cultural resources.

Geology and Soils

The soil erosion or loss of topsoil from grading and excavation operations that would occur with the proposed Project would similarly occur with the Age Restricted Residential Alternative, since grading and construction activities would be the same. As with the proposed Project, less than significant impacts would also occur with this Alternative following compliance with the established regulatory framework.

The Project site is susceptible to seismic, geologic, and soils related hazards. The Age Restricted Residential Alternative would expose people and structures to similar potential adverse effects associated with these hazards as the proposed Project, since the Project footprint and development characteristics would not change. As with the proposed Project, a less than significant impact, with mitigation incorporated, would also occur with this Alternative.

The Age Restricted Residential Alternative would be neither environmentally superior nor inferior in comparison to the proposed Project regarding potential impacts regarding seismicity, geology, and soils.

Greenhouse Gas Emissions

As indicated in Table 5.6-1, Business As Usual Greenhouse Gas Emissions, Project implementation would result in 26,650.52 MTCO₂eq/yr (8.6 MTCO₂eq/yr per capita per year) which exceeds the 4.8 MTCO₂eq/yr per capita per year threshold. The Project's total mitigated GHG emissions would exceed the per capita threshold, resulting in a significant unavoidable impact.

Similar to the Air Quality discussion for this Alternative, construction-related emissions of GHG would be the same as the proposed project since the same grading, construction methodologies, and construction equipment would be employed. Short-term GHG impacts of the Age Restricted Residential Alternative would be similar to the proposed Project.

However, GHG emissions from operational activities would be slightly reduced under the Age Restricted Residential Alternative since it would result in a decrease in residential Project-generated traffic. Since this Alternative would result in a decrease of 403 ADT or approximately



2 percent less compared to the proposed Project, the resultant mobile source GHG emissions are anticipated to be approximately 2 percent less. Although GHG emissions would be slightly reduced, the Project exceeds the identified per capita per year threshold (4.8 MTCO₂eq/yr) by 50 percent. The reduction of GHG associated with this Alternative is not anticipated to eliminate this significant impact. This Alternative would be environmentally superior to the proposed Project regarding GHG emissions, since a reduction in long-term operational emissions would occur. However, the significant and unavoidable impact identified under the proposed Project would not be avoided.

Hazards and Hazardous Materials

Short-term construction-related impacts involving the potential for accidental release of hazardous materials would be similar to the proposed Project, since the same buildings would be demolished/removed and ground-disturbing activities would occur. Thus, less than significant impacts (with mitigation incorporated) involving accidental release of hazardous materials from construction activities would occur with this Alternative, as with the Project.

Additionally, this Alternative would result in the same long-term impacts involving the handling, storage, and/or use of hazardous materials, since the same range of uses (residential, commercial, and open space) would be implemented onsite.

Thus, the Age Restricted Residential Alternative would be neither environmentally superior nor inferior to the proposed Project in regards to hazards and hazardous materials.

Hydrology and Water Quality

The short-term impacts to water quality due to grading, excavation, and construction activities that would occur with the Project would occur also with the Age Restricted Residential Alternative. With this Alternative, these impacts would occur similar to the proposed Project, given this Alternative involves the same grading, construction methodologies, construction equipment, and construction duration. As with the proposed Project, less than significant short-term impacts to water quality would occur with this Alternative following compliance with the established regulatory framework.

This Alternative would also result in similar long-term operational impacts in comparison to the proposed Project. Since the site plan, development characteristics, and amount of impervious area associated with the Alternative would be the same as the Project, the Age Restricted Residential Alternative would similarly result in less than significant long-term impacts related to hydrology, water quality, and groundwater.

Since both short-term construction and long-term operational impacts would be similar, the Age Restricted Residential Alternative would be neither environmentally superior nor inferior to the proposed Project regarding hydrology and water quality.

Land Use and Planning

2012 RTP/SCS. The Age Restricted Residential Alternative would not alter the development characteristics, development intensity, site plan, or range of uses associated with the proposed Project. The inclusion of age restricted residential dwelling units would not result in any inconsistencies with the RTP/SCS, and is anticipated to be consistent with the 2012 RTP/SCS



Goals and growth forecasts. As such, impacts would be similar in this regard; refer to Section 5.9, *Land Use and Planning*, for 2012 RTP/SCS Goals that are applicable to the Project.

Whittier General Plan. As with the proposed Project, this Alternative would require approval of a Specific Plan and Tentative Tract Map. The inclusion of age restricted residential dwelling units would not result in any inconsistencies with the goals and policies within the City's General Plan. As such, impacts would be similar in this regard.

WMC and WBSP. As with the proposed Project, this Alternative assumes a Zoning Code and Zoning Map Amendments changing the existing zoning from Specific Plan (SP, Whittier Boulevard Specific Plan) to SP, Lincoln Specific Plan. This Alternative would also require a Certificate of Appropriateness since the same historic structures would be affected by the Project. The inclusion of age restricted residential uses would not result in any inconsistencies with regulations and policies within the WMC and WBSP, and impacts for this Alternative would be similar to the proposed Project.

Urban Decay. With the Age Restricted Residential Alternative, the site would include the same development capacity. None of the commercial development intensity or uses would change. Thus, impacts related to urban decay would be similar to the proposed Project.

Since impacts for the Age Restricted Residential Alternative related to land use consistency and urban decay would be similar to the proposed Project, this Alternative would be neither environmentally superior nor inferior to the proposed Project.

Fiscal

As with the proposed Project, the Age Restricted Residential Alternative would result in increased General Fund expenditures to be provided by the City because new land uses would be developed and increased public services would occur. The Project's fiscal impacts would be less than significant. Comparatively, this Alternative's fiscal impacts would be similar to the proposed Project, as this Alternative would involve the same range of land uses (commercial, residential, and open space) and the same development intensity. Therefore, the less than significant fiscal impacts that would occur with the proposed Project would occur also with this Alternative. Therefore, the Age Restricted Residential Alternative would be neither environmentally superior nor inferior to the proposed Project in regards to fiscal impacts.

Noise

Short-term noise impacts from demolition, grading, and construction activities would occur with the Age Restricted Residential Alternative due to construction of the proposed buildings and improvements. The proposed Project's construction-related noise impacts would not exceed the established noise standards, thus, resulting in a less than significant impact. Comparatively, this Alternative's construction-related noise impacts would be similar to the proposed Project, given this Alternative would be composed of the same development and construction practices. Therefore, the less than significant (with mitigation incorporated) short-term noise impacts that would occur with the proposed Project would occur also with this Alternative.

Long-term noise impacts from vehicular travel on the surrounding roadway network would occur with the Age Restricted Residential Alternative. The Project's long-term noise impacts would be less than significant. Comparatively, this Alternative's mobile source noise impacts would be slightly less than with the proposed Project, since this Alternative would generate less traffic.



Therefore, the less than significant mobile source noise impacts that would occur with the proposed Project would occur also with this Alternative, although to a slightly lesser degree.

With this Alternative, similar land uses as the Project would operate on the Project site. Therefore, the less than significant stationary source noise impacts from residential uses, delivery trucks, mechanical equipment, parking areas, etc. that would occur with the proposed Project would occur also with this Alternative.

The Age Restricted Residential Alternative would be environmentally superior to the proposed Project, given the slightly reduced mobile source noise impacts that would occur.

Public Services and Recreation

As with the proposed Project, the Age Restricted Residential Alternative would result in increased demands for fire and police protection, schools, and parks and recreation facilities because new land uses would be developed and increased calls for service would occur. The Project's impacts to public services and recreation would be less than significant. Comparatively, this Alternative's impacts to public services and recreation would generally be similar to the proposed Project, given this Alternative would involve the same range of land uses (commercial, residential, and open space) and the same development intensity. However, impacts to school facilities would be slightly reduced, given that student generation associated with age restricted residential uses is lower than non-restricted residential. None of the open space/recreational features proposed under the Project would be altered under this Alternative. Therefore, the less than significant impacts to public services and recreation that would occur with the proposed Project would occur also with this Alternative.

Similar to the proposed Project, the Age Restricted Residential Alternative would result in less than significant impacts to public services and recreation. However, since impacts to school facilities would be reduced due to a lower student generation, this Alternative is considered environmentally superior to the proposed Project.

Utilities and Service Systems

The Age Restricted Residential Alternative and the proposed Project would result in increased demands for water supplies and conveyance facilities, wastewater treatment and sewer facilities, solid waste disposal, and dry utilities, since new development would occur. The Project's impacts to utilities and service systems would be less than significant with mitigation incorporated. Comparatively, this Alternative's impacts to utilities and service systems would be similar to the proposed Project, given this Alternative involves similar development. Therefore, the less than significant (with mitigation incorporated) impacts to utilities and service systems that would occur with the proposed Project would occur also with this Alternative.

The Age Restricted Residential Alternative would be neither environmentally superior nor inferior to the proposed Project regarding impacts to utilities and service systems, since the same demand for service and infrastructure would occur.

Transportation and Traffic

Under the Age Restricted Residential Alternative, the site plan and construction methodology would remain the same as the proposed project. The same grading, construction methodologies, and construction equipment would be employed, and the construction duration



would also remain the same. Thus, it is expected that short-term construction related traffic impacts would be similar to the proposed Project.

The Age Restricted Residential Alternative would generate additional vehicular trips but fewer trips than with the Project, since one-half of the high-density residential use (148 apartments) would be dedicated to age restricted housing. Operational impacts would be reduced as a result of the lower trip generation associated with age restricted housing uses. Table 7-6, Comparison of Proposed Project and Age Restricted Residential Alternative ADT, presents the forecast daily traffic volumes for the Age Restricted Residential Alternative for a typical weekday, and indicates this Alternative is forecast to generate approximately 19,927 ADT. Therefore, this Alternative would have 403 fewer daily trips than the proposed Project.

**Table 7-6
Comparison of Proposed Project and
Age Restricted Residential Alternative ADT**

Land Use	Trip Generation Rate	DU	SF	Average Daily Trips ²
PROPOSED PROJECT				
Single-Family Residential	9.52	187		1,513
Multi-Family Condominiums Residential	8.00	267		1,815
Apartments	6.65	296		1,673
Commercial	Various ¹		208,350	15,329
Total Proposed Project Trips				20,330
AGE RESTRICTED RESIDENTIAL ALTERNATIVE				
Single-Family Residential	9.52	187		1,513
Multi-Family Condominiums Residential	8.00	267		1,815
Apartments	6.65	148		837
Senior Housing (Attached)	3.44	148		433
Commercial	Various ¹		208,350	15,329
Total Age Restricted Residential-Related Trips				19,927
Total Net Average Daily Trips				-403
Total Net Average Daily Trips %				-2%
Notes:				
1. The various trip generation rates for the commercial land uses are shown in Appendix 11.16, Traffic Impact Analysis .				
2. ADTs account for ITE 15% daily internal trip capture reductions.				

Comparatively, the traffic and circulation impacts under the Reduced Density/Additional Historic Preservation Alternative would be less than the Project, given this Alternative's long-term operations would result in lower vehicle trip generation. Although this Alternative results in overall reduction in operational traffic, this Alternative would likely not avoid the Project's significant and unavoidable transportation and traffic impacts.

Under the proposed Project, a number of local and regional transportation facilities were determined to be significantly impacted due to Project trip generation. While this Alternative may reduce traffic levels at one or more of these identified facilities, the majority of these facilities are located outside of the City of Whittier and/or would be mitigated through improvements partially funded by the Project Applicant through a fair share payment. The timing for implementation of the mitigation measures would be determined based on traffic monitoring used in conjunction with buildout of the Project, and/or further consultation with affected agencies. As with the proposed Project, until implementation of the mitigation measures, impacts to the local/regional transportation system would remain a significant and unavoidable impact. Thus, the significant and unavoidable impacts to City, County, State



Highway, and Congestion Management Program facilities is expected to remain under the Age Restricted Residential Alternative.

The Age Restricted Residential Alternative would be environmentally superior to the proposed Project regarding transportation and traffic impacts due to decreased average daily traffic volumes. However, the significant and unavoidable impacts to local and regional transportation facilities in the area would remain.

ABILITY TO MEET PROJECT OBJECTIVES

The Age Restricted Residential Alternative would be generally the same as the proposed Project in that it would involve approval of a Specific Plan that would allow the same land uses and same development total of 750 DU, and approximately 208,350 square feet of commercial land uses. However, this Alternative assumes one-half of the high-density residential use (148 apartments) is dedicated to age restricted housing. The Age Restricted Residential Alternative would meet all of the Project objectives, as identified above. However, as shown in the impact analysis above, the Alternative would reduce but would not eliminate any of the significant and unavoidable impacts associated with the proposed Project.

7.5 “LARGE FORMAT RETAIL” ALTERNATIVE

DESCRIPTION OF ALTERNATIVE

The Large Format Retail Alternative would consist of the development of the site in a similar nature to the proposed Project: up to 750 residential dwelling units and approximately 208,350 square feet of commercial land uses. However the Alternative assumes a 141,000 square-foot large format retail store as a part of 208,350 square feet of commercial uses. Implementation of this large format retail store represents a reconfiguration of commercial land uses within the Project site, but would not increase the total amount of commercial development associated with the Specific Plan. This Alternative assumes construction of a larger single primary retailer that would be complemented by range of smaller retail, commercial, and restaurant uses. This Alternative involves the same development footprint, and residential/open space components under the proposed Project would not be altered. The large format retail facility would continue to occur within Planning Area 1 (The Market), and the land use configuration of the Specific Plan would remain the same. The following discussion evaluates the potential environmental impacts associated with the Large Format Retail Alternative, as compared to impacts from the proposed Project.

This Alternative is considered since the trip generation rate for large format retail uses is lower than the trip generation rate for commercial uses under the proposed Project. As such, this Alternative has the potential to reduce or eliminate the significant impacts identified under the Project related to air quality, greenhouse gases, and traffic.

IMPACT COMPARISON TO THE PROPOSED PROJECT

Aesthetics, Light & Glare

The Large Format Retail Alternative would feature the same construction practices, impact area, building heights, architecture, lighting, landscaping, and design characteristics as the proposed Project. The short-term visual impacts associated with demolition, grading, and construction



activities that would occur with the proposed Project would similarly occur with the Large Format Retail Alternative.

As with the proposed Project, the long-term visual character of the Project site and its surroundings would be altered with this Alternative, since this Alternative would include a similar range of structures, visual massing, hardscape, lighting, and landscape treatments as the proposed Project.

Thus, the less than significant construction-related and long-term operational aesthetics/light and glare impacts identified under the proposed Project would be similar under this Alternative. Thus, this Alternative is considered neither environmentally superior nor inferior in comparison to the proposed Project.

Air Quality

Short-Term Impacts. The Large Format Retail Alternative would result in the same construction practices, equipment, and impact area as the proposed Project. Short-term air quality impacts from demolition, grading, paving, and construction activities would occur with the Large Format Retail Alternative due to construction of the proposed buildings and improvements, and the pollutant emissions would be the same as the Project. Thus, the significant and unavoidable short-term impacts related to regional NO_x emissions, localized NO_x emissions, and cumulative construction emissions would not be avoided.

Long-Term Impacts. Long-term air quality impacts from area and mobile source pollutant emissions would occur with the Large Format Retail Alternative, although to a lesser degree than with the proposed Project. Emissions associated with this Alternative's area sources would be similar than the proposed Project, given the development footprint would be similar. Long-term operational emissions related to vehicular trips would be reduced in comparison to the Project, since large format retail uses feature a lower trip generation rate than the commercial uses identified for the proposed Project (refer to the *Transportation and Traffic* analysis for this Alternative, below).

This Alternative would result in fewer vehicle trips as compared to the proposed project, as this Alternative would result in 15,407 ADT. This represents a decrease of 4,923 ADT or approximately 24 percent less than the proposed Project. The Project's long-term combined area and mobile source pollutant emissions would exceed SCAQMD ROG and NO_x thresholds, resulting in a significant unavoidable impact. As shown in Table 7-7, Large Format Retail Alternative Operational Emissions, assuming a commensurate 24 percent reduction in mobile source emissions due to the Alternative's lower trip generation, this Alternative would still result in an exceedance of SCAQMD thresholds for ROG and NO_x. Thus, this significant unavoidable Project impact would be reduced but not be avoided.

AQMP Consistency. The Project's long-term influence would be consistent with the AQMP and SCAG goals and policies; however, the Project's exceedance of operational ROG and NO_x thresholds would potentially result in a long-term impact on the region's ability to meet State and Federal air quality standards. Therefore, Project impacts associated with AQMP compliance would be significant and unavoidable. As concluded above, the mobile source pollutant emissions reduction that would be achieved by this Alternative would not be sufficient such that the ROG and NO_x thresholds would not be exceeded. Therefore, as with the proposed Project, this Alternative's impacts associated with AQMP compliance would be significant and unavoidable.



**Table 7-7
Large Format Retail Alternative Operational Emissions**

Emissions Source	ROG	NO _x
Project Area/Energy Source Emissions ¹	29.04	5.6
Alternative's Area/Energy Emissions Reduction (0%) ²	-0.00	-0.00
Project Mobile Source Emissions ¹	95.52	179.28
Alternative's Mobile Source Emissions Reduction (24%) ²	-22.92	-43.03
Large Format Retail Alternative's Total Mitigated Emissions	101.63	136.25
SCAQMD Threshold ¹	55	55
Significant Impact?	Yes	Yes
Note: 1. Table 5.2-6, <i>Long-Term Operational Air Emissions</i> . 2. RBF Consulting, <i>Lincoln Specific Plan Traffic Impact Analysis</i> , September 12, 2014.		

The Large Format Retail Alternative would be environmentally superior to the proposed Project regarding air quality impacts since it would result in a reduction in long-term operational air pollutant emissions. Thus, the Large Format Retail Alternative is considered environmentally superior in comparison to the proposed Project. However, it would not eliminate the significant and unavoidable air quality impacts identified under the proposed Project.

Biological Resources

As noted above, the Large Format Retail Alternative would result in the same site plan, impact area, and construction practices as the proposed Project. Under this Alternative, construction activities would occur over the same development footprint as the proposed Project. As with the proposed Project, no impact to riparian habitats, sensitive vegetation communities, wetlands, or jurisdictional waters would occur with this Alternative. The Project's potential impacts to nesting and limited foraging habitats of raptors, owls, and passerines, which would be less than significant with mitigation incorporated, would be similar with this Alternative. Thus, this Alternative would be neither environmentally superior nor inferior in comparison to the proposed Project.

Cultural Resources

Since the impact area and construction methodology associated with the Large Format Retail Alternative would be the same as the proposed Project, the short-term archaeological and paleontological impacts associated with demolition, grading, and construction activities that would occur with the proposed Project would similarly occur with this Alternative. The significant and unavoidable impacts to historical resources that would occur with the proposed Project would similarly occur with the Large Format Retail Alternative, since the same historic resources would be demolished.

The Large Format Retail Alternative would be neither environmentally superior nor inferior in comparison to the proposed Project regarding potential impacts to cultural resources.



Geology and Soils

The soil erosion or loss of topsoil from grading and excavation operations that would occur with the proposed Project would similarly occur with the Large Format Retail Alternative, since grading and construction activities would be the similar. As with the proposed Project, less than significant impacts would also occur with this Alternative following compliance with the established regulatory framework.

The Project site is susceptible to seismic, geologic, and soils related hazards. The Large Format Retail Alternative would expose people and structures to similar potential adverse effects associated with these hazards as the proposed Project, since the Project footprint and geologic conditions applicable to the site would not change. As with the proposed Project, a less than significant impact, with mitigation incorporated, would also occur with this Alternative.

The Large Format Retail Alternative would be neither environmentally superior nor inferior in comparison to the proposed Project regarding potential impacts regarding seismicity, geology, and soils.

Greenhouse Gas Emissions

As indicated in Table 5.6-1, Business As Usual Greenhouse Gas Emissions, Project implementation would result in 26,650.52 MTCO₂eq/yr (8.6 MTCO₂eq/yr per capita per year) which exceeds the 4.8 MTCO₂eq/yr per capita per year threshold. The Project's total mitigated GHG emissions would exceed the per capita threshold, resulting in a significant unavoidable impact.

Similar to the Air Quality discussion for this Alternative, construction-related emissions of GHG would be similar as the proposed project since the similar grading, construction methodologies, and construction equipment would be employed. Short-term GHG impacts of the Large Format Retail Alternative would be similar to the proposed Project.

However, GHG emissions from operational activities would be reduced under the Large Format Retail Alternative since it would result in a decrease in commercial Project-generated traffic. Since this Alternative would result in a decrease of 4,923 ADT or approximately 24 percent less than the proposed Project, the resultant mobile source GHG emissions are anticipated to be approximately 24 percent less.

Although GHG emissions would be slightly reduced, the Project exceeds the identified per capita per year threshold (4.8 MTCO₂eq/yr) by 50 percent. Even when conservatively applying a 24 percent reduction in total Project GHG emissions (construction, area source, mobile source, and indirect emissions), the reduction of GHG associated with this Alternative is not anticipated to eliminate this significant impact. This Alternative would be environmentally superior to the proposed Project regarding GHG emissions, since a reduction in long-term operational emissions would occur. However, the significant and unavoidable impact identified under the proposed Project would not be avoided.

Hazards and Hazardous Materials

Short-term construction-related impacts involving the potential for accidental release of hazardous materials would be similar to the proposed Project, since the same buildings would be demolished/removed and ground-disturbing activities would occur. Thus, less than significant



impacts (with mitigation incorporated) involving accidental release of hazardous materials from construction activities would occur with this Alternative, as with the Project.

Additionally, this Alternative would result in the same long-term impacts involving the handling, storage, and/or use of hazardous materials, since the same range of uses (residential, commercial, and open space) would be implemented onsite.

Thus, the Large Format Retail Alternative would be neither environmentally superior nor inferior to the proposed Project in regards to hazards and hazardous materials.

Hydrology and Water Quality

The short-term impacts to water quality due to grading, excavation, and construction activities that would occur with the Project would occur also with the Large Format Retail Alternative. With this Alternative, these impacts would occur similar to the proposed Project, given this Alternative involves similar grading, construction methodologies, construction equipment, and construction duration. As with the proposed Project, less than significant short-term impacts to water quality would occur with this Alternative following compliance with the established regulatory framework.

This Alternative would also result in similar long-term operational impacts in comparison to the proposed Project. Since the site plan, development characteristics, and amount of impervious area associated with the Alternative would be the same as the Project, the Large Format Retail Alternative would similarly result in less than significant long-term impacts related to hydrology, water quality, and groundwater.

Since both short-term construction and long-term operational impacts would be similar, the Large Format Retail Alternative would be neither environmentally superior nor inferior to the proposed Project regarding hydrology and water quality.

Land Use and Planning

2012 RTP/SCS. The Large Format Retail Alternative would not alter the commercial development intensity, site plan, or range of uses associated with the proposed Project. The inclusion of a large format retail facility would not result in any inconsistencies with the RTP/SCS, and is anticipated to be consistent with the 2012 RTP/SCS Goals and growth forecasts; refer to Section 5.9, Land Use and Planning, for 2012 RTP/SCS Goals that are applicable to the Project. As such, impacts would be similar in this regard.

Whittier General Plan. As with the proposed Project, this Alternative would require approval of a Specific Plan and Tentative Tract Map. The inclusion of large format retail facility would not result in any inconsistencies with the goals and policies within the City's General Plan. As such, impacts would be similar in this regard.

WMC and WBSP. As with the proposed Project, this Alternative assumes a Zoning Code and Zoning Map Amendments changing the existing zoning from Specific Plan (SP, Whittier Boulevard Specific Plan) to SP, Lincoln Specific Plan. This Alternative would also require a Certificate of Appropriateness since the same historic structures would be affected by the Project. The inclusion of a large format retail use would not result in any inconsistencies with regulations and policies within the WMC and WBSP, and impacts for this Alternative would be similar to the proposed Project.



Urban Decay. With the Large Format Retail Alternative, the site would include the same development capacity. None of the commercial development intensity or uses would change. Thus, impacts related to urban decay would be similar to the proposed Project.

Since impacts for the Large Format Retail Alternative related to land use consistency and urban decay would be similar to the proposed Project, this Alternative would be neither environmentally superior nor inferior to the proposed Project.

Fiscal

As with the proposed Project, the Large Format Retail Alternative would result in increased General Fund expenditures to be provided by the City as compared to existing conditions because new land uses would be developed and increased public services would be required. The Project's fiscal impacts would be less than significant. Comparatively, this Alternative's fiscal impacts would be similar to the proposed Project, as this Alternative would involve the same range of land uses (commercial, residential, and open space) and the same development intensity. While implementation of a large format retail use may result in a variation in General Fund revenues (e.g., potential differences in sales tax revenue), any variation is expected to be relatively minor, and General Fund expenditures to provide services to the Project would not substantially increase. Therefore, the less than significant fiscal impacts that would occur with the proposed Project would occur also with this Alternative.

Therefore, the Large Format Retail Alternative would be neither environmentally superior nor inferior to the proposed Project in regards to fiscal impacts.

Noise

Short-term noise impacts from demolition, grading, and construction activities would occur with the Large Format Retail Alternative due to construction of the proposed buildings and improvements. The Project's construction-related noise impacts would not exceed the established noise standards, thus, resulting in a less than significant impact. Comparatively, this Alternative's construction-related noise impacts would be similar to the proposed Project, given this Alternative would be composed of the similar development and construction practices. Therefore, the less than significant (with mitigation incorporated) short-term noise impacts that would occur with the proposed Project would occur also with this Alternative.

Long-term noise impacts from vehicular travel on the surrounding roadway network would occur with the Large Format Retail Alternative. The Project's long-term noise impacts would be less than significant. Comparatively, this Alternative's mobile source noise impacts would be slightly less than with the proposed Project, since this Alternative would generate lower traffic volumes. Therefore, the less than significant mobile source noise impacts that would occur with the proposed Project would occur also with this Alternative, although to a lesser degree.

With this Alternative, similar land uses as the Project would operate on the Project site. Therefore, the less than significant stationary source noise impacts from residential uses, delivery trucks, mechanical equipment, parking areas, etc. that would occur with the proposed Project would occur also with this Alternative.

The Large Format Retail Alternative would be environmentally superior to the proposed Project, given the reduced mobile source noise impacts that would occur.



Public Services and Recreation

The Large Format Retail Alternative and the proposed Project would result in increased demands for fire and police protection, schools, and parks and recreation facilities because new land uses would be developed and increased calls for service would occur. The Project's impacts to public services and recreation would be less than significant. Comparatively, this Alternative's impacts to public services and recreation would be similar to the proposed Project, given this Alternative would involve the same range of land uses (commercial, residential, and open space) and the same development intensity. None of the open space/recreational features proposed under the Project would be altered under this Alternative. Therefore, the less than significant impacts to public services and recreation that would occur with the proposed Project would occur also with this Alternative.

As such, the Large Format Retail Alternative would be neither environmentally superior nor inferior to the proposed Project regarding impacts to public services and recreation.

Utilities and Service Systems

The Large Format Retail Alternative would result in increased demands for water supplies and conveyance facilities, wastewater treatment and sewer facilities, solid waste disposal, and dry utilities, since new development would occur. The Project's impacts to utilities and service systems would be less than significant with mitigation incorporated. Comparatively, this Alternative's impacts to utilities and service systems would be similar to the proposed Project, given this Alternative involves similar development. Therefore, the less than significant (with mitigation incorporated) impacts to utilities and service systems that would occur with the proposed Project would occur also with this Alternative.

The Large Format Retail Alternative would be neither environmentally superior nor inferior to the proposed Project regarding impacts to utilities and service systems, since the same demand for service and infrastructure would occur.

Transportation and Traffic

As noted above, the Large Format Retail Alternative would result in a lower commercial trip generation when compared to the proposed Project. Traffic impacts associated with this Alternative were analyzed in detail in the *Lincoln Specific Plan Traffic Impact Analysis* (Traffic Impact Analysis); see [Appendix 11.16, *Traffic Impact Analysis*](#). The analysis was conducted in order to determine if any of the significant and unavoidable impacts associated with the Project can be reduced or avoided.

The Large Format Retail Alternative consists of reuse of the Project site with up to 750 residential dwelling units and approximately 208,350 square feet of commercial land uses; however, a different mix of commercial land uses is assumed. The Large Format Retail Alternative assumes a 141,000 square-foot large format retail store within a total of 208,350 square feet of commercial uses.

Table 7-8, *Comparison of Proposed Project and Large Format Retail Alternative Daily Trip Generation*, forecasts the Large Format Retail Alternative trip generation and compares it to the proposed Project. As indicated in Table 7-8, this Alternative is forecast to generate approximately 15,407 daily trips, which includes approximately 823 a.m. peak hour trips and



approximately 1,206 p.m. peak hour trips. Comparatively, this Alternative would generate approximately 24 percent fewer daily trips than the proposed Project.

**Table 7-8
Comparison of Proposed Project and Large Format Retail Alternative
Daily Trip Generation**

Land Use	AM Peak Hour Trips			PM Peak Hour Trips			Daily Trips
	In	Out	Total	In	Out	Total	
187-du Single-Family Detached Residential	36	105	141	118	69	187	1,780
296-du Apartments	30	121	151	118	65	183	1,968
267-du Condominium/Townhome	16	128	144	125	69	194	2,136
<i>ITE Internal Trip Capture Reduction (14% PM, 14% Daily)</i>	--	--	--	-51	-28	-79	-824
Residential Subtotal	82	354	436	310	175	485	5,060
8.0-tsfc General Office	11	2	13	2	10	12	88
<i>ITE Internal Trip Capture Reduction (14% PM, 14% Daily)</i>	--	--	--	0	-1	-2	-12
42.850-tsfc Specialty Retail	26	15	41	51	65	116	1,899
<i>ITE Internal Trip Capture Reduction (14% PM, 14% Daily)</i>	--	--	--	-7	-9	-16	-266
141.0-tsfc Large Format Retail	102	48	150	351	351	702	8,071
<i>ITE Internal Trip Capture Reduction (14% PM, 14% Daily)</i>	--	--	--	-49	-49	-98	-1,130
<i>ITE Pass-by Reduction for Large Format Retail (17% PM)</i>	--	--	--	-51	-51	-102	-102
4.50-tsfc Drive-In Bank	31	23	54	55	55	110	667
<i>ITE Internal Trip Capture Reduction (14% PM, 14% Daily)</i>	--	--	--	-8	-8	-15	-93
<i>ITE Pass-by Reduction for Drive-In Bank (47% PM)</i>	--	--	--	-22	-22	-44	-44
14.0-tsfc High-Turnover Restaurant	71	58	129	71	47	118	1,526
<i>ITE Internal Trip Capture Reduction (14% PM, 14% Daily)</i>	--	--	--	-10	-7	-17	-214
<i>ITE Pass-by Reduction for High-Turnover Rest. (43% PM)</i>	--	--	--	-26	-17	-43	-43
Commercial Subtotal	241	146	387	357	364	721	10,347
Daily Trip Generation Large Format Retail Alternative	323	500	823	667	539	1,206	15,407
Daily Trip Generation Proposed Project							20,330
<i>Difference</i>							-4,923
<i>% Difference</i>							-24%

Notes:
 du = dwelling unit, tsf = thousand square feet.
 Source: RBF Consulting, Lincoln Specific Plan Traffic Impact Analysis, October 2014.

As shown in Table 7-8, the Large Format Retail Alternative would result in a lower trip generation associated with commercial uses onsite. Despite this reduction, the Traffic Impact Analysis (refer to Appendix 11.16) indicates that this Alternative would not avoid any of the significant and unavoidable traffic impacts identified under the proposed Project for both forecast existing plus Project conditions and forecast year 2020 plus Project conditions. While the Large Format Retail Alternative would result in an overall lower trip generation than the proposed Project, it is considered neither environmentally superior nor inferior to the proposed



Project since the same City/County intersections, State Highway intersections, Congestion Management Program facilities, and freeway segments would be significantly impacted.

Moreover, under the proposed Project, a number of local and regional transportation facilities were determined to be significantly impacted due to Project trip generation. The majority of these facilities are located outside of the City of Whittier and/or would be mitigated through improvements partially funded by the Project Applicant through a fair share payment. The timing for implementation of the mitigation measures would be determined based on traffic monitoring used in conjunction with buildout of the Project, and/or further consultation with affected agencies. As with the proposed Project, until implementation of the mitigation measures, impacts to the local/regional transportation system would remain a significant and unavoidable impact. Thus, the significant and unavoidable impacts to City, County, State Highway, and Congestion Management Program facilities is expected to remain under the Large Format Retail Alternative.

ABILITY TO MEET PROJECT OBJECTIVES

The Large Format Retail Alternative would be generally the same as the proposed Project in that it would involve approval of a Specific Plan that would allow the same land uses and same development total of 750 DU and approximately 208,350 square feet of commercial land uses. However, this Alternative assumes over half of the commercial land use is dedicated to a 141,000 square feet of large format retail store. The Large Format Retail Alternative would meet all of the Project objectives, as identified above.

7.6 “ENVIRONMENTALLY SUPERIOR” ALTERNATIVE

According to CEQA Guidelines § 15126.6(e), “*No Project*” Alternative, “if the environmentally superior alternative is the “no project” alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.” Table 7-9, Comparison of Alternatives, summarizes the comparative analyses presented above (i.e., the Alternatives compared to the proposed Project).

Based on the analysis provided above and Table 7-9, the No Project Alternative is the environmentally superior alternative, because it would avoid most impacts associated with development of the proposed Project. Therefore, in compliance with CEQA requirements, an environmentally superior alternative among the other alternatives is identified below.

Among the other alternatives, the environmentally superior alternative is the Reduced Density Alternative, given it would eliminate two of the significant and unavoidable impacts associated with the proposed Project. As concluded in the analysis presented above, the Reduced Density Alternative would generally lessen the impacts associated with development of the proposed Project, because it would involve a 50 percent reduction in residential and commercial development on the site. This Alternative would result in decreased impacts related to the following issue areas:



**Table 7-9
Comparison of Alternatives**

Sections	No Project	Reduced Density	Reduced Density/ Additional Historic Preservation	Age – Restricted Residential	Large Format Retail
Aesthetics	∨	∨	∨	=	=
Air Quality	∨	∨*	∨*	∨*	∨*
Biological Resources	∨	=	=	=	=
Cultural Resources	∨	=*	∨*	=*	=*
Geology and Soils	∨	=	∨	=	=
Greenhouse Gas Emissions	∨	∨	∨*	∨*	∨*
Hazards and Hazardous Materials	=	∨	∨	=	=
Hydrology and Water Quality	∨	∨	∨	=	=
Land Use and Planning	=	=	∨	=	=
Fiscal	∧	∧	∧	=	=
Noise	∨	∨	∨	∨	∨
Public Services and Recreation	∨	∨	∨	∨	=
Utilities and Service Systems	∨	∨	∨	=	=
Transportation and Traffic	∨	∨*	∨*	∨*	=*
∧ Indicates an impact that is greater than the proposed Project (environmentally inferior). ∨ Indicates an impact that is less than the proposed Project (environmentally superior). = Indicates an impact that is equal to the proposed Project (neither environmentally superior nor inferior). * Indicates a significant unavoidable impact that would remain under the Alternative.					

- Aesthetics (reduced visual character/quality impacts due to a reduction in construction activities and visual mass, less light and glare due to a reduced residential and commercial development);
- Air Quality (reduced pollutant emissions through a reduction in construction activities and lower trip generation. The significant and unavoidable impact related to localized NO_x emissions would be eliminated);
- Geology and Soils (reduced impacts to seismicity, geology, and soils due to a slightly smaller grading footprint);
- Greenhouse Gas Emissions (reduced pollutant emissions through a reduction in construction activities and lower trip generation. The significant and unavoidable impact related to GHG emissions would be eliminated);
- Hazards and Hazardous Materials (reduced long-term operational impacts due to the reduction in residential and commercial development);
- Hydrology and Water Quality (reduced long-term impacts to water quality due to a reduction in residential and commercial uses);



- Noise (reduced noise generation through a reduction in construction activity and lower trip generation);
- Public Services and Recreation (reduced demand for services and utilities due to a reduction in residential and commercial development);
- Utilities and Service Systems (reduced demands for water supplies and conveyance facilities, wastewater treatment and sewers, solid waste disposal, and dry utilities due to reduced residential and commercial development); and
- Transportation and Traffic (reduced average daily traffic volumes through lower trip generation).

As noted above, the Reduced Density Alternative would eliminate significant and unavoidable impacts related to air quality (localized NO_x emissions) and greenhouse gases. However, the majority of Project objectives would either not be accomplished or would be accomplished to a lesser degree under the Reduced Density Alternative.

This Alternative would not deliver a mix of residential/commercial/recreational land uses to the same degree as the Project, since residential and commercial development would be reduced by 50 percent. This Alternative would reduce the revenue provided to the City's General Fund, and could potentially result in the City's expenditures being greater than General Fund revenues. The range of housing types and diversity of architectural design provided under this Alternative would be limited, given that the number of dwelling units would be reduced by 50 percent. Given the reduced amount of development and increased areas of open space, landscaping, and hardscapes, connectivity between various land uses would be diminished. This Alternative would not implement the General Plan Housing Element's long-range plan for residential development at the site, given the reduction in dwelling units that would occur. The range of housing opportunities provided at the least cost possible and serving a diverse population would not be accomplished to the same extent, since 375 fewer dwelling units would be constructed. In addition, the Reduced Density Alternative would not promote internal trip capture and reduce vehicle miles traveled to the same extent, since the reduced residential/commercial development would diminish the mixed-use benefits identified under the proposed Project.

Given that the majority of benefits identified under the proposed Project would either not be accomplished or would be accomplished to a lesser degree, this Alternative has been rejected from further consideration by the City.