#### 7.1 INTRODUCTION

## 7.1.1 Purpose and Scope

The California Environmental Quality Act (CEQA) requires that an Environmental Impact Report (EIR) include a discussion of reasonable project alternatives that would "feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any significant effects of the project, and evaluate the comparative merits of the alternatives" (CEQA Guidelines Section 15126.6). This chapter identifies potential alternatives to the proposed project and evaluates them, as required by CEQA.

Key provisions of the CEQA Guidelines on alternatives (Section 15126.6[a] through [f]) are summarized below to explain the foundation and legal requirements for the alternatives analysis in the EIR.

- "The discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly." (15126.6[b])
- "The specific alternative of 'no project' shall also be evaluated along with its impact." (15126.6[e][1])
- "The no project analysis shall discuss the existing conditions at the time the Notice of Preparation (NOP) is published, and at the time the environmental analysis is commenced, as well as what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. If the environmentally superior alternative is the 'no project' alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives." (15126.6[e][2])
- "The range of alternatives required in an EIR is governed by a 'rule of reason' that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project." (15126.6[f])
- "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 (or the site is already
  owned by the proponent)." (15126.6[f][1])
- "For alternative locations, "only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR." (15126.6[f][2][A])
- "An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative." (15126.6[f][3])



For each development alternative, this analysis:

- Describes the alternative,
- Analyzes the impact of the alternative as compared to the proposed project,
- Identifies the impacts of the project that would be avoided or lessened by the alternative,
- Assesses whether the alternative would meet most of the basic project objectives,
- Evaluates the comparative merits of the alternative and the project.

Per the CEQA Guidelines Section 15126.6(d), additional significant effects of the alternatives are discussed in less detail than the significant effects of the proposed project.

#### 7.1.2 Project Objectives

As described in Section 3.2, the following objectives have been established for the proposed project and will aid decision makers in their review of the project, the project alternatives, and associated environmental impacts:

- Objective 1: To create a premier medical office development that is compatible with its urban context and adheres to the intent and the requirements of the City's General Plan and the Central Business District Specific Plan and complements the existing medical offices to the north on Madison Avenue.
- Objective 2: To locate a new premier medical office development that encourages pedestrian oriented, less-motorized transportation near growing residential developments and supports the growth of the Central Business District.
- Objective 3: To improve the local economy and the City's tax base by adding high-quality professional and medical related jobs in Pasadena.
- Objective 4: To strategically place street level uses that promote significant pedestrian activity to help expand commercial and recreational activity in the Playhouse District.
- Objective 5: To strategically place underground parking, building entrances, and walkways to create a pedestrian friendly environment for the public and create a pleasant walk that connects Colorado Boulevard and Green Street along Madison Avenue.
- Objective 6: To improve Converse Alley for vehicular and pedestrian traffic from Madison Avenue to Oakland Avenue to improve site access and traffic flow.
- Objective 7: To provide ample parking for the new medical office building and any special needs or events that occur within the Playhouse District to support the unique activities of the District.

# 7.2 ALTERNATIVES CONSIDERED AND REJECTED DURING THE SCOPING/PROJECT PLANNING PROCESS

The following is a discussion of alternatives considered during the scoping and planning process and the reasons why they were not selected for detailed analysis in this EIR. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts" (Guidelines Sec. 15126.6(c)).

# 7.2.1 Alternative Development Areas

The key question and first step in the analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location pursuant to CEQA Guidelines Sec. 15126(5)(B)(1). In general, any development of the size and type proposed by the project would have substantially the same impacts on air quality, greenhouse gas (GHG) emissions, noise, and transportation/traffic. Without a site-specific analysis, impacts on other resources, such as historical resources, cannot be evaluated. However, the proposed project would not affect any historical resources, therefore an alternative development area would not lessen this impact.

The City of Pasadena is largely built out and parcels designated and zoned for office/retail development are largely developed with buildings. Development of the proposed project on such a site may involve displacing businesses—and residents if that site is developed with mixed uses—as well as environmental impacts from demolition of existing building(s). The proposed project site is developed with a surface parking lot; however, the only existing building that would need to be displaced or demolished is a 100-square-foot structure for the parking lot attendant. The Alternative Development Areas alternative was rejected because it would not avoid significant impacts and might result in additional environmental impacts.

#### 7.2.2 Reduced Traffic Alternative

The proposed project would cause significant unavoidable adverse traffic impacts to roadway segments. The worst impact is on the segment of Oakland Avenue south of Colorado Boulevard, where the project impact was 45.26 percent of the cumulative impact. Pursuant to CEQA Guideline Section 15126.6(f), noted above, the Reduced Traffic Alternative was created to reduce impacts to the roadway segment to the point where there would not be a significant unavoidable adverse impact. This alternative requires reducing project-generated trips by approximately 90 percent, from 4,118 daily trips to 454 daily trips. Based on a proportionate reduction in land uses, the Reduced Traffic Alternative would allow 10,600 square feet of medical office use and 1,800 square feet of retail use. Development of 12,400 square feet would only require one story of construction.



This alternative would avoid significant adverse impacts to traffic. It also would reduce air quality impacts and GHG emissions due to the 90 percent reduction in vehicle trips, although the proposed project did not find these impacts to be significant. Additionally, this alternative would reduce construction related air quality and noise impacts by reducing the amount of excavation and building materials required.

The Reduced Traffic Alternative would meet some of the project objectives but to a lesser degree. While this alternative would allow for a mix of medical office and retail uses which meet a portion of the project objectives (Objectives 1, 2, 3 and 7), the 12,400 square foot building would not be a sufficient size to create a premier facility and provide the intended improvement to the local economy and City's tax base. Additionally, this alternative would not improve the local economy or growth of the Central Business District by redeveloping an underutilized site, since it would construct an underutilized building with 0.32 floor area ratio (FAR) at a location where 3.0 FAR is allowed (see Objective 2).

This alternative would require surface parking and the 1,800 square feet of retail would not create enough building area to front Colorado Boulevard for half the length of the building. Therefore, it would not create a pedestrian-oriented space consistent with the Central District Specific Plan (see Objectives, 1, 4 and 5). As a result, this alternative could not attain most of the basic project objectives.

The Reduced Traffic Alternative was rejected as being infeasible pursuant to CEQA Guidelines Section 15126.6(f)(1), because it could not be designed to provide the required amount of retail frontage on Colorado Boulevard pursuant to the City's Zoning Code (Title 17, Municipal Code). Specifically, Figure 3-3

and Table 3-1of Chapter 17.30: the Central District Specific Plan requires a minimum of half the ground floor uses along the Colorado Boulevard frontage to be pedestrian oriented. Office uses are not classified as pedestrian oriented uses and therefore more than half of ground floor office use along Colorado Boulevard would not be allowed.

# 7.2.3 General Office Only Alternative

The General Office Only Alternative would develop a commercial office building of the same size, height, and building area, 112,252 square feet, with the same six-level (5-levels underground) parking structure as the proposed project. This alternative was considered to reduce significant and unavoidable traffic impacts. By developing the entire building with general office use rather than a combination of medical office and specialty retail land uses, the number of daily trips would be reduced by 70 percent compared to the project. Correspondingly, this alternative would also reduce operational air emissions and GHG emissions although the proposed project did not find these impacts to be significant.

This alternative would not attain most of the basic project objectives. Specifically, this alternative would not allow for the development of medical office uses nor create a mix of office and pedestrian- oriented retail uses as the street level. Therefore, this alternative would not meet the following objectives:

- Objective 1: To create a premier medical office development that is compatible with its urban context and adheres to the intent and the requirements of the City's General Plan and the Central Business District Specific Plan and complements the existing medical offices to the north on Madison Avenue.
- Objective 2: To locate a new premier medical office development that encourages pedestrian oriented, less-motorized transportation near growing residential developments and supports the growth of the Central Business District.
- Objective 3: To improve the local economy and the City's tax base by adding high-quality professional and medical related jobs in Pasadena.
- Objective 4: To strategically place street level uses that promote significant pedestrian activity to help expand commercial and recreational activity in the Playhouse District.

This alternative was rejected as infeasible because it is not allowed under the City's Zoning Code (Title 17, Municipal Code), as described previously. Office uses are not classified as pedestrian-oriented uses and therefore an all-office alternative would not be allowed.

#### 7.3 ALTERNATIVES SELECTED FOR FURTHER ANALYSIS

Based on the criteria listed above, the following three alternatives have been determined to represent a reasonable range of alternatives that have the potential to feasibly attain most of the basic objectives of the project but may avoid or substantially lessen any of the significant effects of the project. These alternatives are analyzed in detail in the following sections.

- No Project/No New Development Alternative
- Reduced Intensity Alternative
- General Office/Retail Alternative

#### 7.4 NO PROJECT/NO NEW DEVELOPMENT ALTERNATIVE

In this alternative the project site would not be developed and conditions onsite would remain as they are. The surface parking lot onsite would remain operating.

# 7.4.1 Air Quality

No construction or new operational air emissions would be generated by this alternative. Air quality impacts would be reduced by this alternative and would be less than significant for the proposed project.

#### 7.4.2 Historical Resources

Under this alternative the site would remain operating as a surface parking lot. This alternative would not impact any historical resources. However, the proposed project would not impact any historical resources or affect resources within the adjacent Pasadena Playhouse National Historic District. Therefore, the effects of this alternative would be the same as the proposed project.

#### 7.4.3 Greenhouse Gas Emissions

This alternative would not generate any additional GHG emissions from construction, operational vehicle trips, or use of energy and water. The existing parking lot onsite serves surrounding land uses but does not itself generate vehicle trips. Therefore, GHG emissions impacts would be reduced compared to the proposed project and would be less than significant.

#### 7.4.4 Noise

Under the No Project/No New Development alternative the site would continue to operate as a surface parking lot. Typical parking lot noises would occur, including car-door slams, car horns, car audio systems, people talking, engine idling, and car beeps. Additionally, noise from car idling and ingress and egress through the parking lot would contribute to the general parking lot noise environment. The proposed project would also generate stationary-source noise generated from mechanical systems (e.g., heating, ventilation and air conditioning [HVAC] units), loading and unloading activities, and parking lot noise. These impacts were found to be less than significant, and therefore stationary source noise would be similar for this alternative and the project. However, this alternative would not add additional trips to the roadway system; therefore, operational traffic-related noise impacts would be reduced.

#### 7.4.5 Transportation and Traffic

This alternative would have no traffic or transportation impacts. This alternative would eliminate the significant and unavoidable traffic impacts of the proposed project, the significant increase in traffic volumes on eight roadway segments and impact to one roadway intersection at Madison Avenue and Green Street.

### 7.4.6 Conclusion

The No Project/No New Development Alternative would reduce impacts related to air quality, GHG emissions, noise, and traffic. This alternative would eliminate the project's significant and unavoidable adverse impacts related to traffic. Potential impacts to historical resources would be the same and less than significant under this alternative as well as the proposed project. This alternative would not meet any of the seven project objectives.



#### 7.5 REDUCED INTENSITY ALTERNATIVE

The proposed project would cause a significant traffic impact to eight roadway segments and one intersection. The Reduced Intensity Alternative would reduce these impacts by reducing project generated trips. In this alternative, the total building area would be reduced to 72,900 square feet. Building area per land use is reduced proportionally in this alternative to that of the proposed project, allowing 62,379 square feet of medical office use and 10,521 square feet of specialty retail use. The building in this alternative would be three stories and have a slightly larger footprint than the proposed project. The underground parking structure in this alternative would be four- rather than six-levels and would contain 281 parking spaces.

# 7.5.1 Air Quality

Construction air quality impacts would be reduced slightly in this alternative due to the reduced amount of excavation, grading, and building required. Operational air quality impacts would also be reduced due to the 35 percent reduction in building area and corresponding reduction in trip generation. Air quality impacts would be less than significant for this alternative and the proposed project.

#### 7.5.2 Historical Resources

The Reduced Intensity Alternative would have the same impact area as the proposed project. As a result, impacts to historical resources would be the same and less than significant under this alternative and the proposed project.

#### 7.5.3 Greenhouse Gas Emissions

The Reduced Intensity Alternative's GHG emissions would be reduced to below the 3,000 annual MTons SCAQMD screening threshold. GHG Emissions less than 3,000 MTons annually are not considered to have significant cumulative impacts, and impacts under this alternative would be less than significant. GHG emissions impacts would be reduced in this alternative, however, GHG emissions were not significant for the proposed project.

#### 7.5.4 Noise

Construction noise and vibration impacts would be reduced slightly in this alternative due to the reduced construction effort. However, construction noise impacts of the proposed project would be less than significant, and construction vibration impacts would be less than significant after mitigation is implemented. Mitigation for vibration impacts would still be required under this alternative. This alternative would also reduce operational noise impacts due to a 35 percent reduction in project.

# 7.5.5 Transportation and Traffic

Project trip generation would be reduced by 35 percent in this alternative, to 2,675 trips per day versus 4,118 for the proposed project. In 2015 with-project conditions it is expected that this alternative would eliminate impacts at the one intersection, Madison Avenue at Green Street.

Additionally, traffic impacts would be reduced on roadway segments compared to the proposed project. This alternative would contribute five percent to six roadway segments. While this would reduce impacts to roadway segments, the effect would remain a significant adverse impact for six roadway segments. Other transportation and traffic impacts, such as parking and impacts to alternative transportation would be similar for this alternative as the proposed project. Overall, transportation and traffic impacts would be slightly reduced by this alternative.

#### 7.5.6 Conclusion

Development of this alternative would eliminate one but not all of the significant adverse traffic impacts. Operational impacts related to air quality, GHG emissions, and noise would be reduced compared to the proposed project, although these impacts were determined to be less than significant. Construction related impacts relating to air emissions and noise would be the same as the proposed project. Mitigation would still be required for potential vibration impacts. Impacts relating to historical resources would be less than significant and the same as the proposed project. This Reduced Intensity Alternative would achieve all of the objectives of the proposed project, but not to the same extent as the proposed project.

### 7.6 GENERAL OFFICE/RETAIL ALTERNATIVE

The General Office/Retail Alternative would allow 96,051 square feet of general office and 16,201 square feet of retail. This alternative would meet the requirements of the City's Zoning Code by providing ground floor retail but would convert the medical office use to general office use. The square footage and all other aspects of this alternative, including building height and parking spaces would remain the same as the proposed project.

#### 7.6.1 Air Quality

Construction air quality impacts would be the same as the proposed project since the size of the building, the building footprint, and the amount of excavation and grading would be the same. Operational air quality impacts would be reduced due to the approximate 41 percent reduction in daily vehicle trips (see Section 7.6.5 below). Air quality impacts would be less than significant for this alternative and the proposed project.

#### 7.6.2 Historical Resources

The General Office/Retail Alternative would have the same impact area as the proposed project. As a result, impacts to historical resources would be the same and less than significant under this alternative and the proposed project.

#### 7.6.3 Greenhouse Gas Emissions

The General Office/Retail Alternative's GHG emissions would be reduced as compared to the proposed project due to the approximate 41 percent reduction in daily vehicle trips. GHG emissions would be less than significant for this alternative and the proposed project.

## 7.6.4 Noise

Construction noise and vibration impacts would be the same in this alternative because of the similar construction effort and would require mitigation measures for potential vibration impacts. This alternative would reduce project trip generation by approximately 41 percent, resulting in a reduction of operational noise impacts. Operational noise impacts would be less than significant for this alternative and the proposed project.

### 7.6.5 Transportation and Traffic

Project trip generation would be reduced by approximately 41 percent in this alternative, to 1,706 daily trips<sup>1</sup> per day versus 4,118 for the proposed project. In 2015 with-project conditions it is expected that this



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<sup>&</sup>lt;sup>1</sup> Based on ITE 710-General Office (11.01 daily trips per thousand square feet).

alternative would eliminate the significant adverse impact to one intersection, Madison Avenue at Green Street.

Additionally, traffic impacts would be reduced on roadway segments compared to the proposed project. However, this alternative would contribute over five percent daily trips to six roadway segments. While this would reduce significant impacts to two roadway segments, impacts to 6 segments would remain significant and unavoidable adverse impacts. Other transportation and traffic impacts, such as parking and impacts to alternative transportation would be similar for this alternative as the proposed project. Overall, transportation and traffic impacts would be reduced by this alternative.

#### 7.6.6 Conclusion

Development of this alternative would reduce significant adverse traffic impacts. However, traffic impacts to six intersections would remain significant and unavoidable under this alternative. Operational impacts related to air quality, GHG emissions and noise would also be reduced compared to the proposed project, although these impacts were determined to be less than significant. Construction impacts relating to air quality and noise would be the same as the project. Impacts relating to historical resources would be less than significant and the same as the proposed project.

This General Office/Retail Alternative would achieve some of the objectives of the proposed project. Specifically, this alternative would promote pedestrian activity and improve site access supportive of Objectives 4, 5, and 6. However, this alternative would not develop medical office uses. Therefore, this alternative would not meet the following basic project objectives:

- Objective 1: To create a premier medical office development that is compatible with its urban context and adheres to the intent and the requirements of the City's General Plan and the Central Business District Specific Plan and complements the existing medical offices to the north on Madison Avenue.
- Objective 2: To locate a new premier medical office development that encourages pedestrian oriented, less-motorized transportation near growing residential developments and supports the growth of the Central Business District.
- Objective 3: To improve the local economy and the City's tax base by adding high-quality professional and medical related jobs in Pasadena.
- Objective 7: To provide ample parking for the new medical office building and any special needs or events that occur within the Playhouse District to support the unique activities of the District.

#### 7.7 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires a lead agency to identify the environmentally superior alternative and, in cases where the No Project Alternative is environmentally superior to the proposed project, the environmentally superior development alternative must be identified. Table 7-1 shows an impact comparison between the proposed project and the three alternatives. One alternative has been identified as environmentally superior to the proposed project:

• General Office/Retail Alternative

The General Office/Retail Alternative would reduce daily vehicle trips by approximately 41 percent, which would lessen operational impacts to four of the environmental impact categories, air quality, GHG

emissions, noise, and traffic. However, the project's operational impacts to air quality, GHG emissions, and noise were determined to be less than significant.

The General Office/Retail Alternative would eliminate the significant adverse impact to one intersection (Madison Avenue/Green Street) and two roadway segments. Impacts to six roadway segments would remain significant and unavoidable since there are no feasible mitigation measures to reduce these impacts.

The General Office/Retail Alternative would not construct any medical office uses and therefore would not attain most of the basic project objectives (Objectives 1, 2, 3, and 7). This alternative would place retail at the street level to promote pedestrian activity supportive of Objective 4. In addition, the parking and building entrances under this alternative would be similar to the project, supportive of Objective 5. Site access and traffic flow would also be improved similar to the project under this alternative (Objective 6).

Table 7.7-1 Alternatives Impacts Comparison

Impact	Proposed Project <sup>1</sup>	No Project/No Development Alternative <sup>2</sup>	Reduced Intensity Alternative	General Office/ Retail Alternative
Air Quality	LTS	-	-	-
Historic Resources	LTS	0	0	0
Greenhouse Gas Emissions	LTS	-	-	-
Noise	LTSM	-	-	-
Transportation and Traffic	S/U	-	-	-



No = No Impact LTS = Less than Significant Impact

LTSM = Less than Significant Impact with Mitigation Implemented

S/U = Significant and Unavoidable Impact

- (+) = Impact considered superior when compared with the proposed project; alternative would increase impact.
- (0) = Impact considered neutral when compared with the proposed project; alternative would have similar impacts to the project.
- (-) = Impact considered inferior when compared with the proposed project; Alternative would reduce impact.

Impact Significance Abbreviations:

<sup>&</sup>lt;sup>2</sup> Impact Comparison Symbols (Impacts of Alternative Compared to Proposed Project)

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