

## **7.0 Alternatives**

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## 7.0 ALTERNATIVES

Under CEQA, the identification and analysis of alternatives to a project is a fundamental part of the environmental review process. CEQA Public Resources Code Section 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 the *CEQA Guidelines* 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.*<sup>1</sup>

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."<sup>2</sup> 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.<sup>3</sup>

In selecting project alternatives for analysis, potential alternatives must pass a test of feasibility. *CEQA Guidelines* Section 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.<sup>4</sup> In addition, *CEQA Guidelines* Section 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 following are the project's goals and objectives, which were developed by the Project Applicant, in consultation with the City of Long Beach:

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<sup>1</sup> *CEQA Guidelines* Section 15126.6(a).

<sup>2</sup> *CEQA Guidelines* Section 15126.6(b).

<sup>3</sup> *CEQA Guidelines* Section 15126.6(f).

<sup>4</sup> *CEQA Guidelines* Section 15126.6(e)(2).



- Eliminate a damaged, partially disabled and blighting structure from the Bluff Park Historic District.
- Restore/reconstruct the single family residence on a previously occupied site, using the maximum amount of on-site original materials that is feasible.
- Develop a “new” single-family residence with modern amenities while maintaining the District’s historical significance, character, and quality by using architectural styles, materials, and features from the 1920s, the District’s period of significance.

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. 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). Only locations that would avoid or substantially lessen any of the project’s significant effects need be considered for inclusion. An alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative need not be considered.

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. The Project would not result in significant and unavoidable impacts involving Cultural Resources. The impacts involving the Project’s potential to result in inaccurate restoration of the subject property’s historic character and appearance (i.e., conflicts with Secretary of the Interior’s Standards for Restoration Nos. 3, 6, 7, and 8), which could result in disruption of the neighborhood’s architectural cohesiveness, would be reduced to less than significant through implementation of the recommended mitigation.

Potential environmental impacts associated with the following alternatives are compared to impacts from the proposed Project:

- Alternative 1.1 - “No Project/No Build” Alternative;
- Alternative 1.2 - “No Project/Existing Zoning” Alternative; and
- Alternative 2 – “March 2011 Project” Alternative.

Throughout the following analysis, the alternatives’ impacts are analyzed for Cultural Resources, as examined in Section 5.1 of this EIR. In this manner, each alternative can be compared to the proposed Project on an issue-by-issue basis. Table 7-4, Comparison of Alternatives, which is included at the end of this Section, provides an overview of the alternatives analyzed and a comparison of each alternative’s impact in relation to the proposed Project. This Section also identifies alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process. Section 7.3, Environmentally Superior Alternative, references the “environmentally superior” alternative, as required by the *CEQA Guidelines*.



In accordance with CEQA Guidelines Section 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: failure to meet most of the basic Project objectives; the alternative's infeasibility; or the alternative's inability to avoid significant environmental impacts. One alternative that has been considered and rejected as infeasible is the Alternative Location Alternative. As discussed in more detail below, the Project site is available for development because the Project proponent owns the land on which the Project is proposed. The Project Applicant has thus proposed the Project because the land is already in its ownership and reconstruction of the residence would enhance the property's value and achieve the Project's objectives. With this understanding, it is apparent that the Applicant would not attempt to acquire another property on which to develop a project of similar size and scale to that proposed on the Project site. Developing a project on any available property is not a Project objective, while eliminating a damaged, blighted structure from the Bluff Park Historic District is, as it would enhance the District. Therefore, alternative locations not already owned by the Project Applicant are not evaluated in this EIR due to the current ownership of and asset in the property, and associated costs and constraints involved with acquisition that would impede timely and successful completion of the Project.

## **7.1 "NO PROJECT" ALTERNATIVE**

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."<sup>5</sup> The *CEQA Guidelines* continue to state that "in certain instances, the no project alternative means 'no build' wherein the existing environmental setting is maintained."<sup>6</sup> The "No Project/No Build" Alternative (Alternative 1.1) includes a discussion and analysis of the existing baseline conditions at the time the Notice of Preparation was published on April 1, 2013. The "No Project/Existing Zoning" Alternative (Alternative 1.2), which is the reasonably foreseeable development alternative, includes a discussion and analysis of what would be reasonably expected to occur in the foreseeable future if the Project were not approved, based on the property's current zoning. The No Project scenarios are described and analyzed in order to enable the decision-makers to compare the impacts of approving the proposed Project with the impacts of not approving the Project.

### **7.1.1 "NO PROJECT/NO BUILD" ALTERNATIVE**

#### **DESCRIPTION OF ALTERNATIVE**

The partial demolition of the structure that occurred in 2005 left the residence without interior/exterior walls and roof. As a result of this demolition and further physical deterioration of the remaining structure, the current structure exists only as bare wood framing, with several windows remaining in their frames, on a concrete foundation. Termite damage and dry rot are also present in the framing. Exhibit 5.1-3, *North Elevation of Project Site – Existing Conditions*, illustrates the existing structure.

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<sup>5</sup> *CEQA Guidelines Section 15126.6(e)(2)*.

<sup>6</sup> *CEQA Guidelines Section 15126.6(e)(3)(B)*.



Under the No Project/No Build Alternative, the site would remain in its current condition. The single-family residence would not be reconstructed/restored to its historic exterior appearance and character. The existing historic materials, features, and elements would not be restored and those that were destroyed or lost would not be reconstructed. None of the proposed Project components described in Section 3.0, *Project Description*, would be implemented with the No Project/No Build Alternative.

## **IMPACT COMPARISON TO THE PROPOSED PROJECT**

### **CULTURAL RESOURCES**

The No Project/No Build Alternative would not demolish, alter, or relocate a historical resource, since the subject property does not qualify as a historical resource. Moreover, this Alternative would keep the existing structure in its current condition. Therefore, as with the proposed Project, the No Project/No Build Alternative would have no direct impacts on historical resources. This Alternative is neither environmentally superior nor inferior to the Project in this regard.

The Project would result in potential inaccurate restoration of the subject property's historic character and appearance, which could result in disruption of the neighborhood's architectural cohesiveness (conflicts with Standards for Restoration). With this Alternative, these potential indirect impacts on the Bluff Park Historic District (District) and contributing structures in the Project site's immediate vicinity resulting from Project implementation would not occur. However, if the site were retained in its current condition, no restoration of the subject property's historic character and appearance would occur. Thus, this Alternative would conflict with the Standards for Restoration to a greater degree than the Project. The No Project/No Build Alternative is environmentally inferior to the Project, since it would result in continued indefinite disruption of the neighborhood's architectural cohesiveness.

### **ABILITY TO MEET PROJECT OBJECTIVES**

The No Project/No Build Alternative would not attain any of the Project's objectives.

## **7.1.2 "NO PROJECT/EXISTING ZONING" ALTERNATIVE**

### **DESCRIPTION OF ALTERNATIVE**

The Project site is zoned R-2-L District, which is a two-family residential district with large lots; Long Beach Municipal Code Section 21.31.020.J. The No Project/Existing Zoning Alternative involves maximum build-out under the property's underlying R-2-L zoning restrictions, which include: 40 percent maximum lot coverage; two-story height maximum; 8.0 percent usable open space minimum; and enforcement of all setbacks. This Alternative would involve complete demolition of all on-site improvements and the construction of a two-story, 35-foot-tall single-family development measuring 5,144 square feet (2,392-square-foot first floor and 2,752-square-foot second floor). The Alternative also includes an attached two-car garage (360 square feet).



## **IMPACT COMPARISON TO THE PROPOSED PROJECT**

### **CULTURAL RESOURCES**

The No Project/Existing Zoning Alternative would completely demolish all on-site improvements. However, because the subject property does not qualify as a historical resource, this Alternative would not demolish, alter, or relocate a historical resource. Therefore, as with the proposed Project, this Alternative would have no direct impacts on historical resources. The No Project/Existing Zoning Alternative is neither environmentally superior nor inferior to the Project in this regard.

The Project would result in potential inaccurate restoration of the subject property's historic character and appearance, which could result in disruption of the neighborhood's architectural cohesiveness (conflicts with Standards for Restoration). With the No Project/Existing Zoning Alternative, these potential indirect impacts on the Bluff Park Historic District (District) and contributing structures in the Project site's immediate vicinity resulting from Project implementation would occur also. Moreover, demolishing all on-site improvements, as proposed by this Alternative, would result in greater conflicts with the Standards for Restoration than the Project. Therefore, the No Project/Existing Zoning Alternative is environmentally inferior to the Project, since it would provide no restoration of the subject property's historic character and appearance, and greater disruption of the neighborhood's architectural cohesiveness than the Project.

### **ABILITY TO MEET PROJECT OBJECTIVES**

The No Project/Existing Zoning Alternative would attain only one Project objective: to eliminate a damaged, partially disabled and blighting structure from the Bluff Park Historic District. However, this Alternative would not attain the remaining Project objectives to: restore/reconstruct the single family residence on a previously occupied site, using the maximum amount of on-site original materials that is feasible; and develop a "new" single-family residence with modern amenities while maintaining the District's historical significance, character, and quality by using architectural styles, materials, and features from the 1920s, the District's period of significance.

## **7.2 "MARCH 2011 PROJECT" ALTERNATIVE**

### **DESCRIPTION OF ALTERNATIVE**

The March 2011 Project Alternative would involve complete demolition of all on-site improvements and construction of a two-story, 29-foot-tall single-family development measuring 3,689 square feet (1,899-square-foot first floor and 1,790-square-foot second floor). This development would also include an attached two-car garage (453 square feet) and a workshop (289 square feet) at the rear of the garage.

This Alternative reflects a March 2011 Certificate of Appropriateness submittal (HP11-0060) that underwent review by the Cultural Heritage Commission at an October 2011 study session. The Certificate of Appropriateness was not approved and the proposal never implemented due to opposition/concerns expressed by the Commission.



## **IMPACT COMPARISON TO THE PROPOSED PROJECT**

### **CULTURAL RESOURCES**

The March 2011 Project Alternative would completely demolish all on-site improvements. However, because the subject property does not qualify as a historical resource, this Alternative would not demolish, alter, or relocate a historical resource. Therefore, as with the proposed Project, this Alternative would have no direct impacts on historical resources. The March 2011 Project Alternative is neither environmentally superior nor inferior to the Project in this regard.

The Project would result in potential inaccurate restoration of the subject property's historic character and appearance, which could result in disruption of the neighborhood's architectural cohesiveness (conflicts with Standards for Restoration). With the March 2011 Project Alternative, these potential indirect impacts on the Bluff Park Historic District (District) and contributing structures in the Project site's immediate vicinity resulting from Project implementation would occur also. Moreover, demolishing all on-site improvements, as proposed by this Alternative, would result in greater conflicts with the Standards for Restoration than the Project. Therefore, the March 2011 Project Alternative is environmentally inferior to the Project, since it would provide no restoration of the subject property's historic character and appearance, and greater disruption of the neighborhood's architectural cohesiveness than the Project.

### **ABILITY TO MEET PROJECT OBJECTIVES**

The March 2011 Project Alternative would attain only one Project objective: to eliminate a damaged, partially disabled and blighting structure from the Bluff Park Historic District. However, this Alternative would not attain the remaining Project objectives to: restore/reconstruct the single family residence on a previously occupied site, using the maximum amount of on-site original materials that is feasible; and develop a "new" single-family residence with modern amenities while maintaining the District's historical significance, character, and quality by using architectural styles, materials, and features from the 1920s, the District's period of significance.

## **7.3 "ENVIRONMENTALLY SUPERIOR" ALTERNATIVE**

An EIR must identify an "environmentally superior" alternative and, where the No Project Alternative is identified as environmentally superior, the EIR is then required to identify an environmentally superior alternative from among the others evaluated. The determination of an environmentally superior alternative is based on the consideration of how the alternative: fulfills the Project objectives; reduces significant unavoidable impacts; or substantially reduces the impacts to the surrounding environment.

According to CEQA Guidelines Section 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 7-1, *Comparison of Alternatives*, summarizes the comparative analysis presented above (i.e., the alternatives compared to the proposed Project). Review of Table 7-1 indicates both the No Project/No Build Alternative and the No Project/Existing Zoning Alternative are environmentally inferior to the Project. In addition, the March 2011 Project Alternative is also environmentally inferior to the Project.

**Table 7-1  
Comparison of Alternatives**

Sections	No Project/ No Build	No Project/ Existing Zoning	March 2011 Project
<b>Cultural Resources</b>			
Direct Impacts	=	=	=
Indirect Impacts	▲	▲	▲
▲ 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 and unavoidable impact.			

In consideration of the factors noted above, no Environmentally Superior alternatives have been identified.



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