

V. ALTERNATIVES

1. INTRODUCTION

The identification and analysis of alternatives to a proposed project is a fundamental aspect of the environmental review process under CEQA. Public Resources Code Section 21002 states, in part: “it is the policy of the state that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects.” In addition, Public Resources Code Section 21002.1(a) states: “The purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided.”

CEQA Guidelines Section 15126.6(a) provides the following guidance regarding an EIR’s discussion of alternatives:

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. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. An EIR is not required to consider alternatives which are infeasible.

CEQA Guidelines Section 15126.6(b) emphasizes the selection of project alternatives should be based primarily on the ability to avoid or substantially lessen significant impacts attributable to a proposed project, “even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.” CEQA Guidelines Section 15126.6(f) further directs 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. In selecting project alternatives for analysis, potential alternatives must be feasible. CEQA Guidelines Section 15126.6(f)(1) states:

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 Section 15126.6(e) requires the analysis of a “no project” alternative and CEQA Guidelines Section 15126.6(f)(2) requires the evaluation of alternative location(s) for a proposed project, if feasible. Based on the alternatives analysis, CEQA Guidelines Section 15126.6(e)(2) requires an EIR to designate an environmentally superior alternative. If the environmentally superior alternative is the No Project Alternative, then the EIR must identify an environmentally superior alternative among the other alternatives. CEQA Guidelines Section 15126.6(d) states:

The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project... If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed.

2. PROJECT OBJECTIVES

Reasonable alternatives are those that would attain most of the basic objectives of the Project. As described in **Section II**, the following objectives have been identified for the proposed Project:

Section 15124(b) of the California Environmental Quality Act (CEQA) Guidelines states that the project description shall contain “a statement of the objectives sought by the proposed project.” Section 15124(b) of the CEQA Guidelines further states that “the statement of objectives should include the underlying purpose of the project.”

The objectives of the Project are:

1. Clean up the existing hydrocarbon contamination on site, under an approved RAP by LARWQCB and under the supervision of the City’s Department of Health and Human Services.
2. Provide additional public park space in the Wrigley Heights Neighborhood.
3. Develop a range of attached and detached single-family with the Long Beach Residential development standards and LBMC to assist the City in meeting the goals for housing production identified in the Housing Element of the General Plan.
4. Provide economically viable new housing in the Wrigley Heights neighborhood that will meaningfully contribute to addressing the housing needs for the City of Long Beach and provide housing for residents working in the nearby employment centers.
5. Provide a range of recreational opportunities, including neighborhood parks, pedestrian trails, and bicycle trails segregated from vehicle traffic, which connect with supporting commercial, recreational, and other public facilities, to serve as an alternative to the automobile for surrounding residential neighborhoods and to meet the recreational needs of local residents.

6. Enhance the image of the community through visually attractive and high-quality development that is in scale, complements, and blends with the Wrigley Heights community and surrounding open space.
7. Demonstrate environmental leadership and reduce environmental impacts through the integration of sustainability features into building design and operation, in compliance with LBMC and the Long Beach General Plan Land Use Element.

3. ALTERNATIVES CONSIDERED AND REJECTED AS INFEASIBLE

The range of alternatives required within an EIR is governed by the “rule of reason,” under CEQA Guidelines, Section 15126.6(f), which requires an EIR to set forth only those alternatives necessary to permit a reasoned choice. An EIR need not consider every conceivable alternative to a project. An EIR need not consider an alternative with an unlikely or speculative potential for implementation or an alternative that would result in effects that cannot be reasonably ascertained.

Under CEQA Guidelines Section 15126.6(c), an EIR should identify any alternatives that were considered by the lead agency but were rejected as infeasible and briefly explain the reasons underlying the lead agency’s determination. Pursuant to the CEQA Guidelines(c), the following factors may be used to eliminate alternatives from detailed consideration in an EIR: (i) the alternative’s failure to meet most of the basic project objectives; (ii) the alternative’s infeasibility; or (iii) the alternative’s inability to avoid significant environmental impacts.

Alternative Locations

Alternative locations were rejected as infeasible. The Project Applicant has submitted a request to the City to approve development of the site that is under its ownership and control. In addition, the Project has been designed specifically for the location. Section 15126.6(f)(30) of the CEQA guidelines states that an alternative when implementation is “remote and speculative,” which would be the case for an alternative site that is beyond the control of a project applicant. As such, alternative locations were rejected as infeasible.

Non-residential Development

Developing the site with alternative land uses, specifically non-residential uses, was considered as a potential alternative. For example, a previously proposal to develop the site with self-storage facility was considered by the City in 2004. However, this concept was rejected as a feasible alternative for this EIR due to failing to meet the most basic project objectives. A primary purpose of the Project is to develop housing that would assist the city in meeting its housing goals and provide additional recreational opportunities for the existing Wrigley Heights neighborhood. As stated in Section 15126.6(a) of the CEQA

Guidelines, the range of reasonable alternatives selected are those that would feasibly attain most of the basic objectives of the project. A non-residential alternative would not feasibly attain the basic objectives of the project. As such, nonresidential alternatives were not evaluated.

4. ALTERNATIVES EVALUATED

The following alternatives to the Project are evaluated in this section:

- Alternative 1: No Project/No Development
- Alternative 2: Reduced Density Planned Development
- Alternative 3: Single Family Residential Neighborhood

In accordance with CEQA Guidelines Section 15126.6(d), each alternative is evaluated in sufficient detail to determine whether the overall environmental impacts would be less, similar, or greater than the corresponding impacts of the Project. As such, the focus of the evaluation is on those environmental resources for which the Project may have potential impacts. As discussed previously in this DEIR, the Project is expected to have potential significant impacts with respect to Air Quality emissions, Paleontological Resources, Construction Noise, Traffic Safety and Tribal Cultural Resources.

Alternative 1 – No Project Alternative

Description of Alternative

In accordance with the CEQA Guidelines, the No Project Alternative for a development project on an identifiable property consists of the circumstance under which the project does not proceed. CEQA Guidelines Section 15126.6(e)(3)(B) states "in certain circumstances, the No Project Alternative means 'no build' wherein the existing environmental setting is maintained." Accordingly, for purposes of this analysis, Alternative 1, the No Project/No Build Alternative assumes the Project would not be approved and no new development would occur within the Project Site. Therefore, the physical conditions of the Project Site would generally remain as they are today. The Project Site is located on a previous oil process water treatment site which is currently vacant and undergoing remediation. Limited vegetation exists on site. No access through Wardlow Road to the Project Site would be provided. No new construction would occur.

Comparative Impacts

Air Quality

The Project would result in potentially significant impacts due to construction. Specifically, the construction emissions could result in an exceedance of daily NO_x emissions, which are a function of engine exhaust from construction equipment and trucks. Under a No Project Alternative construction would not occur. As such, No Project Alternative would avoid the proposed project's potentially significant but mitigable construction-related air quality impacts.

In addition, the impact from exposure to pollutants from the adjacent freeways was identified as a potential health risk to future residents. This significant but mitigable impact would also be avoided in the absence of the Project.

Geology and Soils

The potential for impacts to paleontological resources is associated with the ground disturbance during construction. As such, these impacts would be avoided under a No Project alternative. Nonetheless, following established site-specific mitigation measures, the impacts of the Project could be reduced to less than significant.

Noise

The Project would result in potentially significant impacts due to construction. Specifically, construction noise could expose the residents of Wrigley Heights to excessive noise levels. Under a No Project Alternative construction would not occur. As such, the Project's potential noise impacts would be avoided.

Transportation

The Project would have a potential impact on transportation due to the geometric design feature the driveway entrance at Wardlow Road. In a No Project Alternative, this impact would be avoided. Nonetheless, this impact can be mitigated by the installation of a traffic signal.

Tribal Cultural Resources

The potential for impacts to Tribal Cultural Resources is associated with the ground disturbance during construction, which would also occur under the Reduced Density Alternative. As such, these impacts would be avoided under a No Project alternative. Nonetheless, following established site-specific mitigation measures, the impacts of the Project could be reduced to less than significant.

Alternative 2 – Reduced Density

Description of Alternative

As an alternative planned unit development, this Alternative would consider a reduced number of units compared to the proposed Project though with an equivalent program of residential units and amenities on the 15-acres south of the existing Baker Street and a park on the 5-acre space north of Baker Street.

Comparative Impacts

Air Quality

The Project would result in potentially significant impacts due to construction. Specifically, the construction emissions could result in an exceedance of SCAQMD's daily significance thresholds for NO_x emissions, which are a function of engine exhaust from construction equipment and trucks. In addition, the maximum daily localized emissions of PM_{2.5} would exceed the SCAQMD LST during periods of heavy construction. As such, a reduced density alternative would result in less construction activity which could therefore reduce the level of NO_x and PM_{2.5} emissions. Therefore, this alternative could result in a reduced impact as compared with the Project. However, the periods of construction which generate the high levels of NO_x and PM_{2.5} are grading and site preparation, including remediation and even with a reduction in units, the extent of grading and site preparation would be equivalent to the Project. As such, even with fewer units, the maximum days of construction activity would be similar to that of the Project.

Furthermore, with implementation of **MM AQ-1** the regional construction-related daily emissions at the Project Site would not exceed SCAQMD's significance thresholds for any criteria pollutant.

In addition, the impact from exposure to pollutants from the adjacent freeways was identified as a potential health risk to future residents. This impact is location specific, thus a different density or configuration of residences on the site would not avoid the impact. Implementation of **MM AQ-2** would reduce these risks to a less than significant level. Similar mitigation would be expected to be applied to this Alternative.

Geology and Soils

The potential for impacts to paleontological resources is associated with the ground disturbance during construction, which would also occur under the Reduced Density Alternative. Thus, the Reduced Density Alternative would not avoid or reduce significant impacts on paleontological resources. However, like the Project, following established site-specific mitigation measures, could reduce impacts to less than significant.

Noise

The Project would result in potentially significant impacts due to construction. Specifically, construction noise could expose the residents of Wrigley Heights to excessive noise levels. While a reduced density alternative would result in less construction activity, the peak noise levels would occur during site preparation such as grading, and the physical separation from the existing residences would be the same. As such, even a reduced density alternative would likely result in significant noise impacts on nearby residents without mitigation. However, with implementation of **MM Noise-1** the impacts of the Project and the Alternative could be reduced to less than significant levels.

Transportation

The Project would have a potential impact on transportation due to the geometric design feature the driveway entrance at Wardlow Road. This impact would be mitigated by the installation of a traffic signal. A Reduced Density Alternative would be expected to include equivalent access and thus equivalent impacts and mitigation.

Tribal Cultural Resources

The potential for impacts to Tribal Cultural Resources is associated with the ground disturbance during construction, which would also occur under the Reduced Density Alternative. Thus, the Reduced Density Alternative would not avoid or reduce the significant tribal cultural resources impacts of the Project. However, like the Project, following established site-specific mitigation measures, impacts could be reduced to less than significant.

Conclusion

Under a reduce density alternative, the impacts associated with implementation of the Project could be lessened yet not avoided, as those impacts are associated with construction and access which would still occur under an alternative planned unit development. As shown discussed below this alternative would not meet the basic objectives of the project to the same degree as the Project.

Relationship to Project Objectives

As shown in **Table V-1: Alternative 2 Relationship to Project Objectives**, a reduced density planned unit development would further the objectives of the Project, just to a lesser extent. A reduction in unit count would not achieve the objective of providing economically viable new housing to the same extent as the Project.

Table V-1
Alternative 2 Relationship to Project Objectives

Project Objective	Does the Alternative support the Project objectives?
Clean up the existing hydrocarbon contamination on site, under an approved RAP by LARWQCB and under the supervision of the City's Department of Health and Human Services.	Yes. Development of a reduced density planned unit development would clean up the existing hydrocarbon contamination on site in a similar manner to the proposed Project.
Provide additional public park space in the Wrigley Heights Neighborhood.	Yes. Development of a reduced density planned unit development would include park space equivalent to the Project.
Develop a range of attached and detached single-family with the Long Beach Residential development standards and LBMC to assist the City in meeting the goals for housing production identified in the Housing Element of the General Plan.	To a lesser degree. Development of a reduced density planned unit development would include a lesser number and a more limited range of residences.
Provide economically viable new housing in the Wrigley Heights neighborhood that will meaningfully contribute to addressing the housing needs for the City of Long Beach and provide housing for residents working in the nearby employment centers.	To a lesser degree. Development of a reduced density planned unit development would include a lesser number and a more limited range of residences.
Provide a range of recreational opportunities, including neighborhood parks, pedestrian trails, and bicycle trails segregated from vehicle traffic, which connect with supporting commercial, recreational, and other public facilities, to serve as an alternative to the automobile for surrounding residential neighborhoods and to meet the recreational needs of local residents.	Yes. Development of a reduced density planned unit development would include park space equivalent to the Project.
Enhance the image of the community through visually attractive and high-quality development that is in scale, complements, and blends with the Wrigley Heights community and surrounding open space.	Yes. Development of a reduced density alternative would provide a planned unit development of similar visual character to the Project.
Demonstrate environmental leadership and reduce environmental impacts through the integration of sustainability features into building design and operation, in compliance with LBMC and the Long Beach General Plan Land Use Element.	Yes. Development of a reduced density alternative would include equivalent design principles and features to the Project.

Alternative 3 – Single Family Development

Description of Alternative

As an alternative to the proposed planned unit development, the site could be developed with single-family lots consistent with the existing Wrigley Heights neighborhood. A park would still be provided on the 5-acre space north of Baker Street. Site area would be allocated for streets that would connect with the existing neighborhood, and with landscaped biofiltration basins as buffers and stormwater

management. As such, it is estimated that the site could accommodate 60 single family lots as opposed to the 226 units proposed for the Project.

Comparative Impacts

Air Quality

The Project would result in potentially significant impacts due to construction. Specifically, the construction emissions could result in an exceedance of daily NO_x emissions, which are a function of engine exhaust from construction equipment and trucks. In addition, the maximum daily localized emissions of PM_{2.5} would exceed the SCAQMD LST during periods of heavy construction. As such, a Single-Family alternative would result in less construction activity which would therefore reduce the level of NO_x and PM_{2.5} emissions. Therefore, this alternative could reduce a significant impact associated with this Project. However, the periods of construction which generate the high levels of NO_x and PM_{2.5} are grading and site preparation, including remediation and even with a reduction in units, the extent of grading and site preparation would be equivalent to the Project. As such, even with fewer units, the maximum days of construction activity would be similar to that of the Project.

Furthermore, with implementation of **MM AQ-1** the regional construction-related daily emissions at the Project Site would not exceed SCAQMD's significance thresholds for any criteria pollutant. In addition, the impact from exposure to pollutants from the adjacent freeways was identified as a potential health risk to future residents. This impact is location specific, thus a different density or configuration of residences on the site would not avoid the impact. Implementation of **MM AQ-2** would reduce these risks to a less than significant level. Similar mitigation would be expected to be applied to this Alternative.

Geology and Soils

The potential for impacts to paleontological resources is associated with the ground disturbance during construction, which would also occur under the Single-Family Alternative. Thus, the Single-Family Alternative would not avoid or reduce significant impacts on paleontological resources. However, like the Project, following established site-specific mitigation measures, could reduce impacts to less than significant.

Noise

The Project would result in potentially significant impacts due to construction. Specifically, construction noise could expose the residents of Wrigley Heights to excessive noise levels. While a reduced density alternative would result in less construction activity, the peak noise levels would occur during site

preparation such as grading, and the physical separation from the existing residences would be the same. As such, even a Single-Family alternative would likely result in significant noise impacts on nearby residents without mitigation. However, with implementation of **MM Noise-1** the impacts of the Project and the Alternative could be reduced to less than significant levels.

Transportation

The Project would have a potential impact on transportation due to the geometric design feature the driveway entrance at Wardlow Road. This impact would be mitigated by the installation of a traffic signal. The circulation for a Single-Family Alternative could be integrated into the existing Wrigley Heights neighborhood and utilize the existing signalized intersection of Wardlow Road and Magnolia Avenue as the point of access. This could avoid the potential impact of access directly onto Wardlow Road, though would increase traffic through the existing neighborhood. However, it should be noted that the potential impact of the Project's access to Wardlow road would be mitigated by the installation of a traffic signal.

Tribal Cultural Resources

The potential for impacts to Tribal Cultural Resources is associated with the ground disturbance during construction, which would also occur under the Single-Family Alternative. Thus, the Single-Family Alternative would not avoid or reduce the significant tribal cultural resources impacts of the Project. However, like the Project, following established site-specific mitigation measures, impacts could be reduced to less than significant.

Conclusion

Under a single-family alternative, most of the impacts associated with implementation of the Project could be lessened yet not avoided, as those impacts are associated with construction. The potential safety impact of an access point on Wardlow Road would be avoided, though with an increase of traffic within the Wrigley Heights neighborhood. As shown discussed below this alternative would not meet the basic objectives of the project to the same degree as the Project.

Relationship to Project Objectives

As shown in **Table V-2: Alternative 3 Relationship to Project Objectives**, a single-family development would further the objectives of the Project to a lesser extent. The reduction in housing units would not achieve the objective of providing economically viable new housing to the same extent as the Project.

Table V-2
Alternative 3 Relationship to Project Objectives

Project Objective	Does the Alternative support the Project objectives?
Clean up the existing hydrocarbon contamination on site, under an approved RAP by LARWQCB and under the supervision of the City's Department of Health and Human Services.	Yes. Development of a single-family development would clean up the existing hydrocarbon contamination on site in a similar manner to the proposed Project.
Provide additional public park space in the Wrigley Heights Neighborhood.	Yes. Development of a single-family development would include park space equivalent to the Project.
Develop a range of attached and detached single-family with the Long Beach Residential development standards and LBMC to assist the City in meeting the goals for housing production identified in the Housing Element of the General Plan.	To a lesser degree. Development of a single-family development would include a lesser number and a more limited range of residences.
Provide economically viable new housing in the Wrigley Heights neighborhood that will meaningfully contribute to addressing the housing needs for the City of Long Beach and provide housing for residents working in the nearby employment centers.	To a lesser degree. Development of a single-family development would include a lesser number and a more limited range of residences.
Provide a range of recreational opportunities, including neighborhood parks, pedestrian trails, and bicycle trails segregated from vehicle traffic, which connect with supporting commercial, recreational, and other public facilities, to serve as an alternative to the automobile for surrounding residential neighborhoods and to meet the recreational needs of local residents.	Yes. Development of a single-family development would include park space equivalent to the Project.
Enhance the image of the community through visually attractive and high-quality development that is in scale, complements, and blends with the Wrigley Heights community and surrounding open space.	Yes. Development of a single-family development would provide development for a similar scale to the Wrigley Heights neighborhood.
Demonstrate environmental leadership and reduce environmental impacts through the integration of sustainability features into building design and operation, in compliance with LBMC and the Long Beach General Plan Land Use Element.	Yes. Development of a reduced density alternative would include equivalent design principles and features to the Project.

5. ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA Guidelines Section 15126.6(e)(2) requires that an EIR identify an environmentally superior alternative among the alternatives evaluated. If the “no project” alternative is the environmentally superior alternative, the EIR must identify another environmentally superior alternative among the remaining alternatives.

As shown in **Table V-3: Comparison of Alternative Impacts to the Proposed Project**, the Single-Family Alternative would avoid the potential traffic impact of the Project by connecting to the exiting neighborhood streets of Wrigley Heights. As such, it would be an environmentally superior alternative. However, because the Single-Family Alternative would result in a substantial reduction in the number of units developed, it would meet the project objectives to a lesser degree. Furthermore, the potentially significant impacts of the Project can all be lessened to a less than significant level through mitigation measures and still meet the Project’s objectives to the full extent possible.

**Table V-3
Comparison of Alternative Impacts to the Proposed Project**

Environmental Topic	Proposed Project	No Project Alternative	Reduced Density Alternative	Single-Family Alternative
Air Quality	Less than Significant after Mitigation	Avoided	Similar Yet still Less than Significant after Mitigation	Reduced Yet still Less than Significant after Mitigation
Geology and Soils	Less than Significant after Mitigation	Avoided	Similar	Similar
Noise	Less than Significant after Mitigation	Avoided	Similar	Similar
Transportation	Less than Significant after Mitigation	Avoided	Similar	<i>Avoided</i>
Tribal Cultural Resources	Less than Significant after Mitigation	Avoided	Similar	Similar