

## 5.0 ALTERNATIVES

CEQA requires that an EIR describe a range of reasonable alternatives to the project or to the location of the project that could feasibly avoid or lessen significant environmental impacts while substantially attaining the basic objectives of the project.<sup>1</sup> An EIR should also evaluate the comparative merits of the alternatives. This chapter sets forth potential alternatives to the proposed project and provides a qualitative analysis of each alternative and a comparison of each alternative to the proposed project. Key provisions of the CEQA Guidelines pertaining to the alternatives analysis are summarized below.<sup>2</sup>

- The discussion of alternatives shall focus on alternatives to the project including alternative locations that 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.
- The No Project Alternative shall be evaluated along with its potential impacts. The No Project Alternative analysis shall discuss the existing conditions at the time the notice of preparation is published, 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.
- The range of alternatives required in an EIR is governed by a "rule of reason." Therefore, the EIR must evaluate 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 proposed project.
- 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.
- An EIR need not consider an alternative whose effects cannot be reasonably ascertained and whose implementation is remote and speculative.

The range of feasible alternatives is selected and discussed in a manner intended to foster meaningful public participation and informed decision making. Among the factors that may be taken into account when addressing the feasibility of alternatives (as described in CEQA Guidelines Section 15126.6(f)[1]) are environmental impacts, site suitability, economic viability, availability of infrastructure, general plan consistency, regulatory limitations, jurisdictional boundaries, and whether the proponent could reasonably acquire, control, or otherwise have access to the alternative site.

An EIR must briefly describe the rationale for selection and rejection of alternatives. The lead agency may make an initial determination as to which alternatives are feasible, and, therefore, merit in-depth consideration.<sup>3</sup> Alternatives may be eliminated from detailed consideration in the EIR if they fail to meet project objectives, are infeasible, or do not avoid any significant environmental effects.<sup>4</sup>

### 5.1 PROJECT-LEVEL IMPACTS

As addressed in this Draft EIR, the proposed project would create significant and unavoidable impacts associated with:

- **Aesthetics (Shade and Shadow).** During the Winter Solstice, shadows generated from the implementation of the proposed project would impact residential land uses located within and around the CPIO subdistricts and Crenshaw Corridor Specific Plan.

<sup>1</sup>CEQA Guidelines, Title 14, Division 6, Chapter 3, § 15126.6, 2005.

<sup>2</sup>*Ibid.*

<sup>3</sup>CEQA Guidelines, Title 14, Division 6, Chapter 3, §15126.6(f)(3), 2005.

<sup>4</sup>CEQA Guidelines, Title 14, Division 6, Chapter 3, §15126.6(c), 2005.

- **Air Quality (Construction Regional and Localized Emissions).** During construction, regional and localized emissions would exceed the SCAQMD significance thresholds.
- **Greenhouse Gas Emissions (Operational GHG Emissions and Applicable Plans, Policies, or Regulations).** During operation of the proposed project, GHG emissions would not be reduced to less than existing levels. This would have the potential to interfere with implementation of the ClimateLA plan, and subsequently could interfere with the State’s ability to meet its goals under AB 32.
- **Noise (Construction Noise and Vibration).** In the absence of detailed noise and vibration analyses associated with specific projects, it is anticipated that construction noise and vibration levels at various sensitive land uses would still exceed the City’s thresholds of significance. Construction noise and vibration impacts would need to be evaluated further under subsequent CEQA documentation for individual projects proposed in the West Adams CPA.
- **Public Services (Public Parks and Libraries).** Implementation of the proposed project could increase the population within the West Adams CPA by approximately 36,141 persons and would cause significant impacts to public parks and recreational facilities. Similarly, the projected increase in population would likely use the Washington Irving and Baldwin Hills Libraries and require the expansion of the existing libraries or the development of a new library. No feasible mitigation measures were identified to reduce the significant impact related to public parks and libraries to less than significant.
- **Transportation and Traffic (Circulation System and Congestion Management Plan).** No feasible mitigation measures were identified to reduce the significant impact related to the circulation system and Congestion Management Plan to less than significant.

Other significant impacts have been identified; however, all of these impacts would be reduced to less-than-significant levels with implementation of the mitigation measures identified in the respective impact analysis sections of this Draft EIR.

### **Proposed Project Objectives**

As called for by the CEQA Guidelines, the achievement of project objectives must be balanced by the ability of an alternative to reduce the significant impacts of the project. The proposed project’s objectives include:

- Guide land use development through 2030;
- Encourage smart growth;
- Identify appropriate locations for new development;
- Assess public infrastructure, service, and facility needs;
- Minimize lengthy discretionary approvals;
- Provide certainty and predictability for developers, homeowners, and anyone else concerned with future development in Los Angeles; and
- Create enough capacity to meet or exceed SCAG 2030 projections for housing, employment, and population.

Any evaluated alternative should meet as many of these project objectives as possible. In addition, while not specifically required under CEQA, other parameters may be used to further establish criteria for selecting alternatives such as adjustments to project phasing, conformance to all existing zoning requirements, and other “fine-tuning” that could shape feasible alternatives in a manner that may result in reducing identified environmental impacts. In some instances, when the project results in environmental impacts that are reduced to less-than-significant levels with mitigation, an alternative may reduce these less-than-significant impacts even further.

## 5.2 ALTERNATIVES CONSIDERED BUT REJECTED FROM FURTHER CONSIDERATION

---

**No Development Alternative.** As the West Adams CPA is subject to an existing community plan that allows development, the No Development Alternative does not represent a scenario that would likely occur.

**Limited Development Alternative.** The Limited Development Alternative would limit and deter the vast majority of new development activities in the West Adams CPA over the next 20 years. Existing residential land use categories and zones would be amended to adjust the capacity of the current plan downward to further reflect as-built conditions and existing population. New construction would therefore be limited to development of commercial and light industrial vacant lots, reuse of existing buildings, or replacement/reconstruction of existing buildings that may be damaged or need improvements to meet safety codes. Vacant lots could be developed to a level compatible with the land uses on adjacent properties. Substantially limiting the construction of any structures associated with new land uses would be a means of reducing, as much as possible, the significant and unavoidable impacts of the proposed project related to construction activities, and even very small contributions to intersections congested by existing and future pass-through traffic. While this alternative, for the most part, would involve carrying the existing conditions in the West Adams CPA forward into the future, unlike the No Development Alternative, this is an “action alternative” that would require the adoption of new policies and development regulations to limit most existing development to improvements within the envelope of existing buildings rather than permit continued land use activity under the existing 1998 West Adams Community Plan.

With this alternative, some population growth could occur within the West Adams CPA, to the extent that existing residential units, or units that have already been approved, could accommodate additional residents, or due to the change of use of existing structures which could occur under this alternative (e.g., an older commercial structure could be renovated and changed to residential uses). However, through this alternative the existing [Q]CM zoning, which currently prohibits residential, would be maintained along the shallow lot segments of the commercial corridors thereby preserving land for low level employment uses (e.g., warehouse, storage) in lieu of a broad mix that encourages higher-level employment uses (e.g., office or retail) adjacent to residential.

This alternative was rejected as infeasible because with close to 75% of the total developable land area within the West Adams CPA devoted to residential uses and only 15% devoted to commercial and industrial uses, the reduction in capacity through down planning and down zoning of current residential areas could not be addressed across commercial or manufacturing acreage in a manner that would accommodate current or future growth forecasts by SCAG and would, therefore, be inconsistent with population, housing, and employment projections.

**Reduced Height and Development.** With this alternative, new building heights and FAR would be lower than under the proposed project, but all other land use and transportation policies of the plan would remain as proposed. New land uses would be limited to 35 feet in height. A maximum FAR of 1.5:1 is assumed for all commercial and industrial development. In recognition of the projected amount of growth and economic development pressures over the coming 20 years, it is anticipated that under this alternative new land uses would be geographically spread out to more residential parcels across the West Adams CPA and that there would be inadequate land available to accommodate the projected growth at more appropriate targeted areas adjacent to fixed route transit areas. Under this alternative, it is expected that less mixed-use development would occur in these focused areas than the proposed project. This alternative was rejected as infeasible because it would not accommodate the future growth forecasted by SCAG in a manner that addresses the Sustainable Communities Strategy as outlined through SB 375 nor the goals and objectives of the City’s General Plan Framework and would, therefore, be inconsistent with State, Regional and local land use policy.

**Uniform Corridor Growth.** Through this alternative, the proposed plan concentrates future growth along the commercial corridors of Pico, Venice, Washington, Adams, West, Jefferson, Martin Luther King Jr., and Crenshaw Boulevards, Slauson and Florence Avenues, and 48<sup>th</sup> and 54<sup>th</sup> Streets. Little development is considered elsewhere in the West Adams CPA. Distributing growth uniformly along the corridors of the West Adams CPA would not reduce the significant and unavoidable impacts of the proposed project. In addition, as most of the West Adams CPA is residential, distributing growth consistently along the corridors will not achieve the City’s goals of conserving the integrity of existing adjacent residential neighborhoods. In fact, more uniformly spread-out growth would likely result in greater impacts. Increased building height impacts would also be greater to sensitive residential areas, an impact that would occur to a much lesser degree under the proposed project. Also, there would likely be increased VMT, as future growth would not be concentrated at existing and emerging transportation hubs where employees, residents, and visitors can take advantage of existing transit opportunities. The City carefully considered those areas in the West Adams CPA with the highest potential to accommodate future growth while limiting environmental impacts. Other areas of the West Adams CPA do not have the same potential to accommodate the same level of growth that is required to be consistent with SCAG growth forecasts. Therefore, this alternative was rejected from further consideration.

## 5.2 ALTERNATIVES TO THE PROPOSED PROJECT

---

The CEQA statute, the CEQA Guidelines, and related recent court cases do not specify a precise number of alternatives to be evaluated in an EIR. Rather, “the range of alternatives required in an EIR is governed by the rule of reason that sets forth only those alternatives necessary to permit a reasoned choice.”<sup>5</sup> At the same time, Section 15126.6(b) of the CEQA Guidelines requires that “...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” and Section 15126.6(f) requires, “The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project.” Accordingly, alternatives that would not address potentially significant effects are not considered herein. However, the CEQA Guidelines require that a "No Project" alternative must be included and, if appropriate, an alternative site location should be analyzed.<sup>6</sup> Other project alternatives may involve a modification of the proposed land uses, density, or other project elements at the same project location.

Alternatives should be selected on the basis of their ability to attain all or most of the basic objectives of the project while reducing the project’s significant environmental effects. The CEQA Guidelines state that “[...]the EIR should briefly describe the rationale for selecting alternatives to be discussed [and]...shall include sufficient information to allow meaningful evaluation, analysis and comparison with the proposed project.”<sup>7</sup> The feasibility of the alternatives is another consideration in the selection of alternatives. The CEQA Guidelines state that “[a]mong 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 [and] jurisdictional boundaries...”<sup>8</sup> “The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making.”<sup>9</sup> Alternatives that are considered remote or speculative, or whose effects cannot be reasonably predicted do not require consideration. Therefore, feasibility, the potential to mitigate significant project-related impacts, and reasonably informing the decision-maker are the primary considerations in the selection and evaluation of alternatives.

**Alternative 1 – No Project Alternative.** The No Project Alternative is required by Section 15126.6 (e)(2) of the CEQA Guidelines and assumes that the proposed project would not be implemented. The No Project

---

<sup>5</sup>CEQA Guidelines, Section 15126.6(f).

<sup>6</sup>CEQA Guidelines, Section 15126.6(e) and Section 15126(f)(2).

<sup>7</sup>CEQA Guidelines, Section 15126.6(e) and Section 15126(f).

<sup>8</sup>CEQA Guidelines, Section 15126.6(f)(1).

<sup>9</sup>CEQA Guidelines, Section 15126.6(f).

Alternative allows the decision-maker to compare the impacts of approving the proposed project with the impacts of not approving the proposed project. However, “no project” does not mean that development within the West Adams CPA will be prohibited. The No Project Alternative includes “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” (CEQA Section 15126.6 [e][2]).

Under this Alternative, the existing 1998 West Adams Community Plan would not be modified and development would continue to occur under the existing goals, objectives, policies, zoning, and land uses. While employment and population would increase under the No Project Alternative, development would not exceed the levels of reasonable development anticipated to occur under the existing community plan. **Table 5-1** shows an employment, population, and dwelling unit comparison between the proposed project and the alternatives.

<b>TABLE 5-1: EMPLOYMENT, POPULATION, AND DWELLING UNIT COMPARISONS</b>			
<b>Category</b>	<b>Proposed Project</b>	<b>Alternative 1 – No Project Alternative</b>	<b>Alternative 2 – Proposed Project Without Transit-Oriented Development</b>
Employment	53,113	49,220	52,478
Population	218,741	206,521	213,863
Dwelling Units	86,118	81,307	84,198
<b>SOURCE:</b> City of Los Angeles Department Of City Planning, Demographic Research Unit, Statistical Information, 2012.			

**Alternative 2 – Proposed Project without Transit-Oriented Development (TOD).** Under this Alternative, most of the changes to the existing West Adams Community Plan would be similar as under the proposed project. However, this Alternative would not shift development intensity to focused TOD areas to the same degree recommended under proposed project. Instead, this alternative would create smaller nodes at the LRT station areas consistent with the approach found within the Commercial Corridors and Major Intersections Nodes CPIO Subdistrict ordinance. Stated more simply, the development standards and guidelines these TOD areas would be the same as those contained within the Commercial Corridors and Major Intersection Nodes CPIO Subdistrict ordinance and would not allow for further tailoring of building heights, development intensities and parking requirements. The result would result in somewhat less intense development and the exclusion of regulations specific to TODs, such as reduced parking standards. Overall, Alternative 2 would involve a scenario where somewhat less population, housing, and employment growth capacity would take place compared to the proposed project.

The summary comparison of impacts of the project alternatives and the proposed project is included in **Table 5-2**.

<b>TABLE 5-2: IMPACT COMPARISON OF ALTERNATIVES TO THE PROPOSED PROJECT</b>			
<b>Environmental Issue</b>	<b>Project Impact</b>	<b>Alternative 1</b>	<b>Alternative 2</b>
<b>AESTHETICS</b>			
Visual Character	Less than Significant with Mitigation	Similar (Less than Significant with Mitigation)	Less, but remain significant with mitigation
Views and Vistas	Less than Significant	Similar (Less than Significant)	Less, but remain significant with mitigation
Scenic Resources	Less than Significant	Similar (Less than Significant)	Less, but remain significant with mitigation
Light & Glare	Less than Significant with Mitigation	Similar (Less than Significant with Mitigation)	Less, but remain significant with mitigation
Shade & Shadows	Significant and Unavoidable	Less, but remain significant and unavoidable	Less, but remain significant and unavoidable
<b>AGRICULTURAL RESOURCES</b>			
Farmland	No Impact	Similar (No Impact)	Similar (No Impact)
Agricultural Land	No Impact	Similar (No Impact)	Similar (No Impact)
Timberland	No Impact	Similar (No Impact)	Similar (No Impact)
Forest Land	No Impact	Similar (No Impact)	Similar (No Impact)
<b>AIR QUALITY</b>			
Regional	Significant and Unavoidable	Less, but remain significant and unavoidable	Less, but remain significant and unavoidable
Localized	Significant and Unavoidable	Less, but remain significant and unavoidable	Less, but remain significant and unavoidable
Toxic Air Contaminants	Less than Significant with Mitigation	Similar (Less than Significant with Mitigation)	Similar (Less than Significant with mitigation)
Odors	Less than Significant	Similar (Less than Significant)	Similar (Less than Significant)
Consistency with Air Quality Management Plan	Less than Significant	Similar (Less than Significant)	Similar (Less than Significant)
<b>BIOLOGICAL RESOURCES</b>			
Special Status Species Habitat	Less than Significant	Less, but remain less than significant	Less, but remain less than significant
Riparian Habitat	Less than Significant	Less, but remain less than significant	Less, but remain less than significant
Wetlands	Less than Significant	Less, but remain less than significant	Less, but remain less than significant
Migratory Birds	Less than Significant with Mitigation	Less, but remain less than significant with mitigation	Less, but remain less than significant with mitigation
Tree Preservation	Less than Significant with Mitigation	Less, but remain less than significant with mitigation	Less, but remain less than significant with mitigation
Habitat Conservation Plans	Less than Significant	Less, but remain less than significant	Less, but remain less than significant
<b>CULTURAL RESOURCES</b>			
Historical Resources	Less than Significant with Mitigation	Similar (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)
Archeological Resources	Less than Significant with Mitigation	Similar (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)
Paleontological Resources	Less than Significant with Mitigation	Similar (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)
Human Remains	Less than Significant with Mitigation	Similar (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)
<b>GEOLOGY &amp; SOILS</b>			
Seismicity	Less than Significant	Similar (Less than Significant)	Similar (Less than Significant)
Soil Erosion	Less than Significant	Similar (Less than Significant)	Similar (Less than Significant)
Unstable Soils	Less than Significant	Similar (Less than Significant)	Similar (Less than Significant)
Expansive Soils	Less than Significant	Similar (Less than Significant)	Similar (Less than Significant)
Septic Tanks	No Impact	Similar (No Impact)	Similar (No Impact)

<b>TABLE 5-2: IMPACT COMPARISON OF ALTERNATIVES TO THE PROPOSED PROJECT</b>			
<b>Environmental Issue</b>	<b>Project Impact</b>	<b>Alternative 1</b>	<b>Alternative 2</b>
<b>GREENHOUSE GAS EMISSIONS</b>			
Greenhouse Gas Emissions	Significant and Unavoidable	Greater (Significant and Unavoidable)	Greater (Significant and Unavoidable)
Applicable Plans, Policies, or Regulations	Significant and Unavoidable	Greater (Significant and Unavoidable)	Greater (Significant and Unavoidable)
<b>HAZARDS &amp; HAZARDOUS MATERIALS</b>			
Transport, Use, and Disposal	Less than Significant	Less, but remains less than significant	Less, but remains less than significant
Upset and Accident Conditions	Less than Significant	Less, but remains less than significant	Less, but remains less than significant
Schools	Less than Significant	Less, but remains less than significant	Less, but remains less than significant
Hazardous Materials Sites	Less than Significant with Mitigation	Less, but remains less than significant with mitigation	Less, but remains less than significant with mitigation
Airport Hazards	Less than Significant	Less, but remains less than significant	Less, but remains less than significant
Emergency Response Plans	Less than Significant	Less, but remains less than significant	Less, but remains less than significant
Wildland Fire	Less than Significant	Less, but remains less than significant	Less, but remains less than significant
<b>HYDROLOGY &amp; WATER QUALITY</b>			
Surface Water Quality	Less than Significant	Less, but remains less than significant	Less, but remains less than significant
Groundwater	Less than Significant	Less, but remains less than significant	Less, but remains less than significant
Stormwater Drainage	Less than Significant	Less, but remains less than significant	Less, but remains less than significant
Flooding and Inundation	Less than Significant	Less, but remains less than significant	Less, but remains less than significant
Inundation by Seiche, Tsunami, or Mudflow	Less than Significant	Less, but remains less than significant	Less, but remains less than significant
<b>LAND USE &amp; PLANNING</b>			
Land Use Compatibility	Less than Significant	Similar (Less than Significant)	Less, but remains less than significant
Land Use Consistency	Less than Significant	Similar (Less than Significant)	Less, but remains less than significant
Habitat Conservation Plans	No Impact	Similar (No Impact)	Similar (No Impact)
<b>MINERAL RESOURCES</b>			
Statewide/Regional Mineral Resources	Less than Significant	Similar (Less than Significant)	Similar (Less than Significant)
Local Mineral Resources	No Impact	Similar (No Impact)	Similar (No Impact)
<b>NOISE</b>			
Noise	Significant and Unavoidable	Less, but remains significant and unavoidable	Less, but remains significant and unavoidable
Groundborne Vibration	Significant and Unavoidable	Less, but remains significant and unavoidable	Less, but remains significant and unavoidable
<b>POPULATION, HOUSING, &amp; EMPLOYMENT</b>			
Population	Less than Significant	Similar (Less than Significant)	Similar (Less than Significant)
Housing	Less than Significant	Similar (Less than Significant)	Similar (Less than Significant)
Employment	Less than Significant	Similar (Less than Significant)	Similar (Less than Significant)

<b>TABLE 5-2: IMPACT COMPARISON OF ALTERNATIVES TO THE PROPOSED PROJECT</b>			
<b>Environmental Issue</b>	<b>Project Impact</b>	<b>Alternative 1</b>	<b>Alternative 2</b>
<b>PUBLIC SERVICES</b>			
Fire Protection & Emergency Services	Less than Significant	Similar (Less than Significant)	Similar (Less than Significant)
Police Protection Services	Less than Significant with Mitigation	Similar (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)
Public Schools	Less than Significant	Similar (Less than Significant)	Similar (Less than Significant)
Parks and Other Public Services	Significant and Unavoidable	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)
<b>TRANSPORTATION &amp; TRAFFIC</b>			
Circulation System	Significant and Unavoidable	Greater (Significant and Unavoidable)	Greater (Significant and Unavoidable)
Congestion Management Program	Significant and Unavoidable	Greater (Significant and Unavoidable)	Greater (Significant and Unavoidable)
Emergency Access	Less than Significant	Similar (Less than Significant)	Similar (Less than Significant)
Public Transit, Bicycle, or Pedestrian Facilities	Less than Significant	Similar (Less than Significant)	Similar (Less than Significant)
<b>UTILITIES &amp; SERVICE SYSTEMS</b>			
Water	Less than Significant	Less, but remains less than significant	Less, but remains less than significant
Wastewater	Less than Significant	Less, but remains less than significant	Less, but remains less than significant
Solid Waste	Less than Significant	Less, but remains less than significant	Less, but remains less than significant
Energy	Less than Significant	Less, but remains less than significant	Less, but remains less than significant
<b>SOURCE:</b> TAHA, 2012.			

## **Analysis of Alternative 1 – No Project Alternative**

### **Aesthetics**

Impacts under the No Project Alternative would be less than the proposed project because although height is unlimited, the maximum FAR (building intensity) allowed for projects would be less at nodes and certain TOD subareas. However, analysis shows that development constructed under the current 1998 West Adams Community Plan could still produce significant impacts to existing residential properties. Furthermore, although buildings would be lower in scale, new buildings would be constructed without the design guidelines of the proposed project, which could result in increased impacts to visual character and scenic resources. Impacts to light and glare, shade and shadow, and view corridors within or around the West Adams CPA would have the potential for fewer interruptions based on the reduced maximum heights. Therefore, no new impacts are anticipated.

### **Agriculture and Forestry Resources**

Impacts under the No Project Alternative would be similar to the proposed project. Alternative 1 would result in less capacity for growth due to lower overall development capacity of the 1998 West Adams Community Plan. However, impacts to agriculture and forestry resources are not strictly dependent upon the magnitude of growth. Rather, assessing impacts is based on whether a project would convert any land considered “Important Farmland” by the California Department of Conservation (DOC), Farmland Mapping and Monitoring Program (FMMP). Additionally, impacts are evaluated for conflicts to existing local zoning for agricultural land, forest land, timberland, or farmland. Accordingly, the West Adams CPA does not currently contain any lands considered Important Farmland by the FMMP, nor any locally zoned agricultural land, forest land, timberland, or farmland. Therefore, no new impacts are anticipated.

### **Air Quality**

**Construction.** Impacts under the No Project Alternative would be less than the proposed project. Alternative 1 would result in less capacity for growth and new development, resulting in less construction emissions. However, it is anticipated that the construction emissions that would occur would exceed the South Coast Air Quality Management District significance thresholds. Therefore, construction impacts would remain significant and unavoidable. .

**Operations.** Impacts under the No Project Alternative would be similar to the proposed project. The lower capacity for growth associated with Alternative 1 would result in less air quality emissions from stationary sources such as electricity generation. In addition, new regulations and improved engine technology would substantially reduce vehicle emissions between 2008 and 2030 despite the absence of intensified development around proposed transit areas associated with the proposed project. Therefore, no new operational impacts are anticipated.

### **Biological Resources**

Impacts under the No Project Alternative would be less than the proposed project because Alternative 1 would result in less capacity for growth primarily due to lower overall development capacity of the 1998 West Adams Community Plan. The lower capacity for growth would result in fewer impacts to biological resources. However, development in the West Adams CPA would continue to occur under the existing plan, which does not include higher density development along major corridors, activity centers, and TOD areas. Therefore, no new impacts are anticipated.

### **Cultural Resources**

Impacts under the No Project Alternative would be similar to the proposed project. Alternative 1 would result in less capacity for growth due to lower overall development capacity of the 1998 West Adams Community Plan. While impacts to cultural resources could be less as a result of less development, the

potential always exists to disturb previously unknown cultural resources. Therefore, no new impacts are anticipated.

### **Geology and Soils**

Impacts under the No Project Alternative would be similar to the proposed project. Alternative 1 would result in reduced population, employment, and dwelling units; therefore, less development and infrastructure would be subject to risk as a result of surface rupture, ground shaking, liquefaction, landslides, or other risks associated with seismic events. Consequently, fewer people would be exposed to potential seismic hazards both at home and at work. However, Alternative 1 would not include the redevelopment at commercial and transit-served nodes included under the proposed project. Existing structures within these areas of the West Adams CPA would remain, with many of the older structures not built to current seismic safety standards, and risk more extensive damage in the event of an earthquake. While fewer people would be exposed to seismic hazards under Alternative 1, the age of existing structures could increase risk to damages from an earthquake. Therefore, no new impacts are anticipated.

### **Greenhouse Gas Emissions**

Impacts under the No Project Alternative would be greater than the proposed project. The GHG analysis assessed stationary and mobile source emissions. Alternative 1 would result in less capacity for growth and new development resulting in fewer emissions from stationary sources such as electricity generation. Unlike criteria pollutant emissions, new regulations and improved engine technology are not anticipated to result in a substantial reduction in GHG emissions from 2008 to 2030. As result, the increase in regional vehicle miles traveled associated with continued development in the West Adams CPA between and 2008 and 2030 would increase GHG emissions. In addition, the absence of intensified development around proposed transit areas would further contribute to increased regional vehicle miles traveled. Therefore, new impacts are anticipated.

### **Hazards and Hazardous Materials**

Impacts under the No Project Alternative would be less than the proposed project because Alternative 1 would have less capacity for growth due to lower overall development capacity of the 1998 West Adams Community Plan. This would result in less development and fewer people that would be subject to risk related to hazards or hazardous materials. Therefore, no new impacts are anticipated.

### **Hydrology and Water Quality**

Impacts under the No Project Alternative would be less than the proposed project because Alternative 1 would have less capacity for growth due to lower overall development capacity of the 1998 West Adams Community Plan. This would result in less development and fewer people that would be subject to water quality impacts or flooding. Therefore, no new impacts are anticipated.

### **Land Use and Planning**

Impacts under the No Project Alternative would be greater than the proposed project. While Alternative 1 would have less capacity for growth due to lower overall development capacity of the 1998 West Adams Community Plan, land use designation changes in the proposed project would reduce existing land use conflicts, promote land use compatibility, and accommodate new development and growth capacity. Alternative 1 would not resolve the existing land use conflicts caused by incompatible land use and zoning inconsistencies. Therefore, new impacts are anticipated.

## **Mineral Resources**

Impacts under the No Project Alternative would be similar to the proposed project. Alternative 1 would have less capacity for growth due to lower overall development capacity of the 1998 West Adams Community Plan. However, impacts to mineral resources are not strictly dependent upon the magnitude of growth. Rather, assessing impacts is based on whether a project would result, directly or indirectly, in the loss of known mineral resources valuable to the region and/or state. Within the West Adams CPA, known mineral resources of Statewide and/or regional importance do exist; however, most development from Alternative 1 would be infill of existing urban spaces. Therefore, no new impacts are anticipated.

## **Noise**

**Construction.** Impacts under the No Project Alternative would be less than the proposed project. Alternative 1 would result in less capacity for growth and new development resulting in less community exposure to construction noise and vibration. However, it is anticipated that the construction noise and vibration that does occur would also exceed City standards at sensitive receptors. Therefore, no new impacts are anticipated.

**Operations.** Impacts under the No Project Alternative would be less than the proposed project. The lower capacity for growth associated with Alternative 1 would result in less exposure to operational stationary and mobile source noise. This would be due to less new development and associated mechanical equipment and passenger vehicle trips. Therefore, no new impacts are anticipated.

## **Population, Housing, and Employment**

Impacts under the No Project Alternative would be similar to the proposed project. Alternative 1 would result in less capacity for growth and new development. Since Alternative 1 would allow for fewer total housing units, this could result in increased household size due to a lack of adequate housing, higher housing prices, and related impacts such as substandard housing. Therefore, Alternative 1 could result in greater housing impacts. In addition, Alternative 1 could result in less capacity for commercial growth and, therefore, fewer job opportunities and greater employment-related impacts such as insufficient employment opportunities to meet the demand from an anticipated increase in population. However, impacts related to population, employment, and housing would be only marginally greater and, consequently, similar to the proposed project. Therefore, no new impacts are anticipated.

## **Public Services**

Impacts under the No Project Alternative would be similar to the proposed project. While Alternative 1 would result in less capacity for growth and new development, reasonably foreseeable population growth would result in greater demand for the available public services. Existing shortages in community and neighborhood parks are exacerbated by any growth; consequently, impacts related to public services would be similar to the proposed project. Therefore, no new impacts are anticipated.

## **Transportation and Traffic**

Impacts under the No Project Alternative would be greater than the proposed project. Alternative 1 would result in less capacity for growth and new development and transportation and traffic impacts would be significant, as the percentage of roadway segments projected to operate at LOS E or F would increase. In addition, the bicycle facility improvements, the implementation of Transportation Demand Management (TDM) Strategies, a Residential Neighborhood Traffic Management Plan, Transportation Systems Management (TSM) Strategies, Highway Infrastructure Improvements, Street System Classification Changes, and public transit improvements, which are included as part of the West Adams TIMP, would not be implemented under Alternative 1. Therefore, new impacts would be anticipated.

## Utilities and Services Systems

Impacts under the No Project Alternative would be less than the proposed project because Alternative 1 would result in less capacity for growth and new development. The decreased population capacity under Alternative 1 would result in less demand for utilities and service systems. Therefore, no new impacts are anticipated.

## Analysis of Alternative 2 – Proposed Project Without Transit-Oriented Development (TOD)

### Aesthetics

Impacts under Alternative 2 would be less than the proposed project because the maximum height allowed within specific TOD areas would be less, and buildings would be lower in scale as a result of modest height increases only at major intersection nodes. However, analysis shows that development constructed under this alternative could still produce significant impacts to residential properties, especially since development pressure would be more equally distributed along the length of commercial corridors of the CPA as opposed to targeted TOD subareas. In addition, TOD districts would not be implemented, but design guidelines would be implemented. This would result in fewer impacts to visual character, scenic resources, light and glare, shade and shadow, and view corridors. Therefore, no new impacts are anticipated.

### Agriculture and Forestry Resources

Impacts under Alternative 2 would be similar to the proposed project. Alternative 2 would result in less capacity for growth and new development; however, impacts to agriculture and forestry resources are not strictly dependent upon the magnitude of growth. Rather, assessing impacts to agriculture and forestry resources is based on whether a project would convert any land considered “Important Farmland” by the California Department of Conservation (DOC), Farmland Mapping and Monitoring Program (FMMP). Additionally, impacts are evaluated for conflicts to existing local zoning for agricultural land, forest land, timberland, or farmland. The West Adams CPA does not currently contain any lands considered Important Farmland by the FMMP nor any locally zoned agricultural land, forest land, timberland, or farmland. Therefore, no new impacts are anticipated.

### Air Quality

**Construction.** Impacts under Alternative 2 would be less than the proposed project. Alternative 2 would result in less capacity for growth and new development which would result in less construction emissions. However, it is anticipated that the construction emissions that would occur would exceed the SCAQMD significance thresholds. Therefore, no new construction impacts are anticipated.

**Operations.** Impacts under Alternative 2 would be similar to the proposed project. The lower capacity for growth associated with Alternative 2 would result in less air quality emissions from stationary sources such as electricity generation. In addition, new regulations and improved engine technology would substantially reduce vehicle emissions between 2008 and 2030 despite the absence of intensified development around proposed transit areas associated with the proposed project. Therefore, no new operational impacts are anticipated.

### Biological Resources

Impacts under Alternative 2 would be less than the proposed project because Alternative 2 would result in less capacity for growth and new development. Impacts to biological resources could potentially be less as a result of marginally less intense development overall. However, development in the West Adams CPA would still continue. Therefore, no new impacts are anticipated.

### **Cultural Resources**

Impacts under Alternative 2 would be similar to the proposed project. Alternative 2 would result in less capacity for growth; however, while impacts to cultural resources could be less as a result of less development, the potential always exists to disturb previously unknown cultural resources. Therefore, no new impacts are anticipated.

### **Geology and Soils**

Impacts under Alternative 2 would be less than the proposed project because Alternative 2 would result in reduced population, employment, and dwelling units. This would result in less development and infrastructure that would be subject to risk as a result of surface rupture, ground shaking, liquefaction, landslides, or other risks associated with seismic events. Fewer people would be exposed to potential seismic hazards both at home and at work. Therefore, no new impacts are anticipated.

### **Greenhouse Gas Emissions**

Impacts under Alternative 2 would be greater than the proposed project. The GHG analysis assessed stationary and mobile source emissions. Alternative 2 would result in less capacity for growth and new development that would result in fewer emissions from stationary sources such as electricity generation. Unlike criteria pollutant emissions, new regulations and improved engine technology are not anticipated to result in a substantial reduction in GHG emissions from 2008 to 2030. As result, the increase in regional vehicle miles traveled associated with continued development in the West Adams CPA between and 2008 and 2030 would increase GHG emissions. In addition, the absence of intensified development around proposed transit areas would further contribute to increased regional vehicle miles traveled. Therefore, new impacts are anticipated.

### **Hazards and Hazardous Materials**

Impacts under Alternative 2 would be less than the proposed project because Alternative 2 would result in reduced population, employment, and dwelling units. This would result in less development and fewer people that would be subject to risk related to hazards or hazardous materials. Therefore, no new impacts are anticipated.

### **Hydrology and Water Quality**

Impacts under Alternative 2 would be less than the proposed project because Alternative 2 would result in less capacity for growth. This would result in less development and fewer people that would be subject to water quality impacts or flooding. Therefore, no new impacts are anticipated.

### **Land Use and Planning**

Impacts under Alternative 2 would be less than the proposed project because Alternative 2 would result in less capacity for growth. Alternative 2 would resolve the existing land use conflicts caused by incompatible land use and zoning inconsistencies such as the proposed project would. Therefore, no new impacts are anticipated.

### **Mineral Resources**

Impacts under Alternative 2 would be similar to the proposed project. Alternative 2 would result in less capacity for growth; however, impacts to mineral resources are not strictly dependent upon the magnitude of growth. Rather, assessing impacts to mineral resources is based on whether a project would result, directly or indirectly, in the loss of known mineral resources valuable to the region and/or state. Within the West Adams CPA, known mineral resources of Statewide and/or regional importance do exist; however, most development from Alternative 2 would be infill of existing urban spaces. Therefore, no new impacts are anticipated.

## **Noise**

**Construction.** Impacts under Alternative 2 would be less than the proposed project because Alternative 2 would result in less capacity for growth and new development. This would result in less community exposure to construction noise and vibration. However, it is anticipated that the construction noise and vibration that does occur would also exceed City standards at sensitive receptors. Therefore, no new construction impacts are anticipated.

**Operations.** Impacts under Alternative 2 would be similar to the proposed project. The lower capacity for growth associated with Alternative 2 would result in marginally less exposure to operational stationary and mobile source noise. This would be due to less new development and associated mechanical equipment and passenger vehicle trips. In addition, there would be less potential for sensitive receptor exposure to noise associated with Expo LRT because TOD districts would not be included in Alternative 2. However, the minimal decrease in impacts to operational noise and vibration would result in similar impacts as the proposed project. Therefore, no new operational impacts are anticipated.

## **Population, Housing, and Employment**

Impacts under Alternative 2 would be similar to the proposed project. Alternative 2 would result in less capacity for growth and new development and would allow for fewer total housing units. This could result in increased household size due to a lack of adequate housing, higher housing prices, and related impacts such as substandard housing. Therefore, Alternative 2 could result in greater housing impacts and less commercial growth. This could lead to fewer job opportunities and greater employment-related impacts such as insufficient employment opportunities to meet the demand from an anticipated increase in population. However, impacts related to population, employment, and housing would be only marginally greater and, consequently, similar to the proposed project. Therefore, no new impacts are anticipated.

## **Public Services**

Impacts under Alternative 2 would be similar to the proposed project. While Alternative 2 would result in less capacity for growth and new development, its anticipated population growth from increased residential capacity would result in greater demand for the available public services. Existing shortages in community and neighborhood parks are exacerbated by any growth; consequently, impacts related to public services would be similar to the proposed project. Therefore, no new impacts are anticipated.

## **Transportation and Traffic**

Impacts under Alternative 2 would be greater than the proposed project. Alternative 2 would result in less capacity for growth and new development. Transportation and traffic impacts would be significant, as the percentage of roadway segments projected to operate at LOS E or F would increase. While the transportation improvements proposed as part of the West Adams TIMP would be implemented, the absence of intensified development around proposed transit areas under Alternative 2 would further contribute to increased regional vehicle miles traveled. Therefore, new impacts are anticipated.

## **Utilities and Services Systems**

Impacts under Alternative 2 would be less than the proposed project because Alternative 2 would result in less capacity for growth and new development. The decreased population growth under Alternative 2 would result in less demand for utilities and service systems. Therefore, no new impacts are anticipated.

## **ENVIRONMENTALLY SUPERIOR ALTERNATIVE**

Section 15126.6 of the State CEQA Guidelines requires that an “environmentally superior” alternative be selected among the alternatives that are evaluated in the EIR. In general, the environmentally superior alternative is the alternative that would be expected to generate the fewest adverse impacts. If the No Project alternative is identified as environmentally superior, then another environmentally superior alternative shall be identified among the other alternatives.

A summary of the two alternatives’ impacts relative to the proposed project are shown **Table 5-3**.

<b>TABLE 5-3: SUMMARY OF BETTER/WORSE IMPACTS BETWEEN ALL ALTERNATIVES AND THE PROPOSED PROJECT</b>		
<b>Alternative</b>	<b>Greater than Proposed Project</b>	<b>Less than Proposed Project</b>
Alternative 1 - No Project	Greenhouse Gas Emissions	Air Quality
	Transportation and Traffic	Biological Resources
	Land Use & Planning	Hazards & Hazardous Materials
	--	Hydrology & Water Quality
	--	Noise
Alternative 2 – Proposed Project Without Transit-Oriented Development	--	Utilities & Service Systems
	Greenhouse Gas Emissions	Aesthetics
	Transportation and Traffic	Air Quality
	--	Biological Resources
	--	Geology & Soils
	--	Hazards & Hazardous Materials
	--	Hydrology & Water Quality
	--	Land Use & Planning
--	Noise	
--	Utilities & Service Systems	

**SOURCE:** TAHA, 2012.

The No Project Alternative (Alternative 1) would have lesser impacts related to Air Quality, Biological Resources, Hazards and Hazardous Materials, Hydrology and Water Quality, Noise, and Utilities and Service Systems than the proposed project. However, Alternative 1 would create potentially greater impacts related to Greenhouse Gas Emissions, Land Use and Planning, and Transportation and Traffic when compared to the proposed project. Also, Alternative 1 would not be consistent with the project objectives. In particular, Alternative 1 would not encourage smart growth, as it would not establish TOD districts, and Alternative 1 would not provide enough capacity to meet projected SCAG population increases for the West Adams CPA. Since the City of Los Angeles is generally central and close to the densest core of jobs and housing in southern California, regional and statewide planning laws, policies and regulations encourage regional growth to be directed to this region, particularly around fixed rail transit stations. Redirecting growth away from the regional core would cause growth to be accommodated on the fringe and in exurbs, which could further exacerbate regional environmental impacts.

The Proposed Project Without Transit-Oriented Development Alternative (Alternative 2) would have lesser impacts related to Aesthetics, Air Quality, Biological Resources, Geology and Soils, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Noise, and Utilities and Service Systems than the proposed project. However, Alternative 2 would create potentially greater impacts related to Greenhouse Gas Emissions and Transportation and Traffic when compared to the proposed project. While Alternative 2 would not meet all of the project objectives, it would meet more than Alternative 1, through providing land use changes for consistency with the General Plan, minimizing discretionary approvals, and providing more certainty and predictability for future developments than Alternative 1. It also provides for more population capacity than Alternative 1, so it is better able to meet projected SCAG increases for the West Adams CPA.

Of the two alternatives, Alternative 2 would be considered the environmentally superior alternative because it produces the fewest impacts when compared to the proposed project. While Alternative 2 is superior from a strictly environmental stand point, it does not meet the goals and objectives of the City in terms of encouraging a multimodal transportation system and creating a more sustainable land use pattern by focusing change near transit stations and nodes.

The proposed project, on the other hand, accommodates the level of growth forecasted by SCAG for 2030 and allows for a certain level of growth capacity over and above it to accommodate unanticipated fluctuations. The proposed project is also consistent with the City's recent policy directives and Initiatives which aim to create attractive, walkable, and sustainable communities with a focus on TOD areas. This style of development encourages transit ridership, reduces traffic, provides a mix of housing, commercial, and transportation choices, and increases efficiency so that people can utilize alternatives modes of travel for daily trips. It also accounts for regional implications of dispersed growth and is consistent with state laws such as SB 375 which aim to reduce per capita resource consumption and GHG generation through increased development densities in urban cores. In addition, the proposed project, with its TOD CPIO Subdistricts, is consistent with the City's recent policy direction in promoting active, revitalized communities that reduce barriers to healthful living. The proposed project facilitates walking by creating capacity for increased housing located near jobs or near transit that is connected to a job core (Downtown Los Angeles). The proposed project contains design guidelines which aim to improve the pedestrian environment and creates capacity for neighborhood retail in proximity to residential neighborhoods, which can further encourage pedestrian activity. Finally, accommodating growth closer to the core of a major urban area can shorten commute trips, and reduce traffic, air pollution and greenhouse gas emissions. In the view of the Department of City Planning, the proposed project best meets the overall planning goals and objectives of the City.