
V. ALTERNATIVES TO THE PROPOSED PROJECT

A. SUMMARY OF ALTERNATIVES

This section of the EIR describes a range of reasonable alternatives to the project, and evaluates the environmental impacts associated with each alternative, as required by CEQA. The analysis of alternatives focuses on the alternatives capable of reducing or eliminating the significant, unavoidable adverse impacts of the Project. Specifically, this EIR analyzes the following alternatives:

- Alternative A: No Project
- Alternative B: Reduced Density Alternative
- Alternative C: Design Alternative
- Alternative D: Land Use Alternative
- Alternative E: Alternative Site

Alternative A, the No Project Alternative assumes that no project is approved and the existing 40,000 square foot warehouse/mechanical facility remains within the Project area. Thus, under this alternative, the physical conditions of the Project site would remain as they exist today. **Alternative B**, the Reduced Density Alternative includes the types of uses as set forth with the proposed Project, but reduces the amount of development, which would occur at the Project site. On an overall basis, the amount of development is reduced by 30 percent, to a total of approximately 2.8 million square feet of development. **Alternative C**, the Design Alternative, includes the same amount of development as the proposed Project; however changes to the design of the Project have been incorporated into this alternative to reflect a project which is oriented more towards Figueroa Street (i.e., convention hotel and central plaza), and includes reductions in building height and signage within current regulations in order to address the principal environmental effects of the Project from a physical design perspective. **Alternative D**, the Land Use Alternative, calls for a substantial reorientation of the Project from one that seeks to create a sports and entertainment district to one that is predominately residential in character. Alternative D consists of 2,400 residential units, as well as support retail development (i.e., supermarket, dry cleaners, etc.). **Alternative E**, the Alternative Site Alternative, proposes to locate the Project at a different site as a means of understanding the environmental effects of the Project in a different geographical context. The alternative site selected for analysis is the Cornfields Site, also located in the City of Los

Angeles, northeast of Chinatown. A comparison of the characteristics of the alternatives to the Project is provided in Table 59 on page 450.

B. BASIC OBJECTIVES OF THE PROJECT

The Project would include the development of approximately 27.1-acres to create the *Los Angeles Sports and Entertainment District*, which would serve as an integrated, mixed-use development designed to enhance the downtown Los Angeles area as a regional center for sports and entertainment, and to achieve public goals aimed at enhancing the economic viability of the Los Angeles Convention and Exhibition Center. This objective would be facilitated by the development of a major regional urban entertainment center, mixed-use development, and residential units that would complement STAPLES Center and the adjacent Los Angeles Convention and Exhibition Center. More specific Project Objectives, pursuant to *CEQA Guidelines* Section 15126.6(a), are provided in Section II.A of this Draft EIR.

C. ANALYSIS FORMAT

The land use components of each of the five alternatives evaluated in this section of the Draft EIR are summarized in Table 59. Each of the five alternatives is evaluated in sequence. Each alternative is evaluated in less detail than in Section IV, Environmental Impact Analyses, of the EIR but in sufficient detail to determine whether overall environmental impacts after mitigation would be better, similar or worse than the corresponding net impacts of the proposed Project, and whether Project objectives are substantially attained. Determining the comparative impacts follows the process described below:

- a. The net environmental impacts of the alternative project after reasonable mitigation are determined for each environmental issue area.
- b. Post-mitigation significant and non-significant environmental impacts of the alternative and the proposed Project are compared for each environmental element. Where the net impact of the alternative would be clearly less adverse or more beneficial than the proposed Project, the comparative impact is said to be “better” or “much better.” Where the alternative’s net impact would be clearly more adverse or less beneficial than the proposed Project, the comparative impact is said to be “worse” or “much worse.” Where alternative and proposed Project net impacts would be roughly equivalent the comparative impact is said to be “similar.”

Table 59

COMPARISON OF ALTERNATIVES

Project Characteristics	Project as Proposed	Alternative A: No Project	Alternative B: Reduced Density Alternative	Alternative C: Design Alternative	Alternative D: Land Use Alternative	Alternative E: Alternative Site
Acreage	27.1	27.1	27.1	27.1	27.1	27.1 (portion of site)
Types of Uses	Hotel, Retail, Entertainment, Restaurant, Office, Commercial and Residential	Surface parking, warehousing	Hotel, Retail, Entertainment, Restaurant, Office, Commercial and Residential	Hotel, Retail, Entertainment, Restaurant, Office, Commercial and Residential	Hotel, Retail, and Residential	Hotel, Retail, Entertainment, Restaurant, Office, Commercial and Residential
Number of Hotel Rooms and Floor Area	1,800 rooms 1,590,000 sq.ft.	-0-	1,500 rooms ^b 1,367,000 sq.ft.	1,800 rooms 1,590,000 sq.ft.	1,400 rooms 1,237,000 sq. ft.	1,800 rooms 1,590,000 sq.ft.
Retail/Entertainment/ Restaurant Floor Area	1,115,000 sq.ft.	-0-	660,000 sq.ft.	1,115,000 sq.ft.	153,000 sq.ft.	1,115,000 sq.ft.
Office/Commercial Floor Area	425,000 sq.ft.	-0-	258,000 sq.ft.	425,000 sq.ft.	-0-	425,000 sq.ft.
Warehouse Floor Area	-0-	40,000 sq.ft.	-0-	-0-	-0-	-0-
Residential Units and Floor Area	800 d.u. 870,000 sq.ft.	-0-	475 d.u. 516,000 sq.ft.	800 d.u. 870,000 sq.ft.	2,400 d.u. 2,610,000 sq.ft.	800 d.u. 870,000 sq.ft.
TOTAL FLOOR AREA	4,000,000 sq.ft.	40,000 sq.ft.^a	2,801,000 sq.ft.	4,000,000 sq.ft.	4,000,000 sq.ft.	4,000,000 sq.ft.

^a The balance of the 27.1-acre site would continue to be operated as surface parking lots.

^b The number of hotel rooms analyzed in this Alternative differs from the minimum required in the existing Disposition and Development Agreement and the minimum set forth in the Equivalency Program.

Source: PCR Services Corporation, December 2000

- c. For each alternative, the impact regarding each environmental topic is summarized and compared to the proposed Project. The comparative summary of the impacts is followed by a general discussion of whether the basic Project objectives are substantially attained by the alternative.

D. ALTERNATIVES CONSIDERED BUT REJECTED

Pursuant to CEQA Guidelines Section 15126.6(c), an EIR should also identify any alternatives that were considered for analysis but rejected as infeasible and discuss the reasons for their rejection. Of the various alternatives available for evaluation, the process of selecting project alternatives to be analyzed in this Draft EIR commenced with identification of the significant effects associated with the proposed Project, a review of the objectives established for the proposed Project, and consideration of the land use plans applicable to the Project site. Further, Section 15126.6(a) of the CEQA Guidelines stresses that the selection of alternatives should evaluate alternatives that would lessen impacts.

Within this construct, the process that the Lead Agency undertook was to start with the broadest range of possibilities. Each was evaluated for its applicability of inclusion into the EIR pursuant to CEQA. A complete array of land use and design alternatives were considered, which included all residential, all commercial, or all industrial land uses. However, in order to address pre-existing conditions that are referenced in the Central City Community Plan and the Central Business District Redevelopment Plan, and that are provided in the approved Disposition and Development Agreement (DDA) for the construction of STAPLES Center, two Project elements were retained across all alternatives: development of a 1,400-room convention hotel, and the inclusion of 500 residential units. Accordingly, all single land use options were rejected as not in keeping with existing objectives, plans and covenants, and alternatives that represent a more balanced program of development were considered. An alternative with extensive industrial uses was also rejected; since it would be inconsistent with good land use planning, and would be inconsistent with existing zoning or city or Project objectives.

The first alternative that was considered was development pursuant to existing zoning, where development could reach FAR of 6.0 over the entire site (assuming the Project meets certain use provisions within the [Q]R5-4D zone). Based upon Project site acreage of 27.1 acres, the total allowable site development could exceed seven million square feet under existing zoning. As this approach would nearly double the development proposed for the Project, it would clearly result in impacts that exceed those analyzed for the Project in this EIR. Therefore, the inclusion of an alternative based upon existing zoning was dismissed from consideration because it would clearly increase impacts, not reduce them.

The Lead Agency focused its attention on development programs which demonstrated strong linkage between the Central City Community Plan, and General Plan objectives for the South Park area, and which followed the general trends for current downtown development, by creating a balanced approach to project land uses including a mix of hotel, commercial and residential uses. One such balanced land use alternative was retained for further evaluation in the EIR (see Alternative D, Land Use Alternative).

Various design alternatives were also considered for the Project site that evaluated a range of activity across the site in order to separate desired dramatic effects for certain land uses (i.e., hotel, theater, commercial) from slight and subtle effects for other uses (i.e., residential). Design alternatives were also considered that moved uses around the entire site; however, the strong relationship between STAPLES Center and the Convention Center and the urban entertainment uses, determined that the Olympic East Properties was the preferred location for the convention hotel and key entertainment-related elements such as the theater and central plaza. Nevertheless, a design alternative was evaluated in the EIR as Alternative C, which orients the central plaza and convention hotel design features directly toward Figueroa Street. While this design approach is suggested in the STAPLES Center DDA, it fails to recognize the importance of direct connectivity between the Project site and existing Convention Center and major league sports activities located across 11th Street and thus would not maximize Project synergy and identity.

Finally, as described in Alternative E, an alternate site for the Project was evaluated. However, due to the need to complement existing convention and sports activities adjacent to the Project site, and the desire to locate within or near an appropriate employment base, alternative locations quite distant from downtown Los Angeles were deemed generally infeasible.

E. DESCRIPTION OF ALTERNATIVES

The following sections provide a relative comparison of the five alternatives analyzed within this section. This comparison is summarized in Table 61 on page 453. An environmentally superior alternative is then selected from among the five alternatives.

1. ALTERNATIVE A: NO PROJECT ALTERNATIVE

a. Description of the No Project Alternative

The No Project Alternative assumes that the Project would not be implemented and that existing land uses within the Project area would remain unchanged. Accordingly, this alternative would be equivalent to the Project site conditions discussed under Environmental Setting for each category analyzed in this EIR.

Table 61

COMPARISON OF ALTERNATIVE IMPACTS WITH PROJECT IMPACTS

Issue Area	Project Impact	Alternative A No Project Alternative	Alternative B Reduced Density Alternative	Alternative C Design Alternative	Alternative D Land Use Alternative	Alternative E Alternative Site
LAND USE						
- Off-site	Less than Significant	Better	Better	Similar	Better	Worse
- Policy	Less than Significant	Worse	Worse	Worse	Worse	Worse
VISUAL QUALITY	Significant	Much Better	Better	Much Better (signage) Worse (visual access)	Better	Worse
LIGHT AND GLARE	Significant	Much Better	Better	Worse	Better	Worse
SHADE/SHADOW	Significant	Much Better	Better	Similar	Better	Better
POPULATION, HOUSING, AND EMPLOYMENT						
- Population	Less than Significant	Worse	Better	Similar	Similar	Similar
- Housing	Less than Significant	Worse	Better	Similar	Better	Similar
- Employment	Less than Significant	Worse	Worse	Similar	Worse	Similar
DRAINAGE AND SURFACE WATER QUALITY						
- Drainage	Less than Significant	Better	Similar	Similar	Similar	Worse
- Surface Water Quality	Less than Significant	Better	Better	Similar	Similar	Similar

Table 61 (Continued)

COMPARISON OF ALTERNATIVE IMPACTS WITH PROJECT IMPACTS

Issue Area	Project Impact	Alternative A No Project Alternative	Alternative B Reduced Density Alternative	Alternative C Design Alternative	Alternative D Land Use Alternative	Alternative E Alternative Site
AIR QUALITY						
- Construction	Significant	Much Better	Similar	Similar	Similar	Similar
- Operational	Significant	Much Better	Similar	Similar	Better	Worse
TRAFFIC	Significant	Much Better	Better	Similar	Better	Worse
PARKING	Less than Significant	Similar	Similar	Similar	Similar	Similar
PEDESTRIAN SAFETY	Less than Significant	Better	Better	Worse	Worse	Better
HAZARDOUS MATERIALS						
- Exposure	Less than Significant	Worse	Similar	Similar	Similar	Similar
- Construction	Less than Significant	Better	Similar	Similar	Similar	Similar
- Operations	Less than Significant	Similar	Similar	Similar	Similar	Similar
NOISE						
- Construction	Significant	Much Better	Better	Worse	Better	Better
- Operation	Significant	Much Better	Better	Worse	Better	Worse
PUBLIC SERVICES						
- Fire	Less than Significant	Better	Better	Similar	Better	Similar
- Police	Significant (cumulative)	Better	Better	Similar	Better	Similar

Table 61 (Continued)

COMPARISON OF ALTERNATIVE IMPACTS WITH PROJECT IMPACTS

Issue Area	Project Impact	Alternative A No Project Alternative	Alternative B Reduced Density Alternative	Alternative C Design Alternative	Alternative D Land Use Alternative	Alternative E Alternative Site
- Parks	Significant	Much Better	Better	Similar	Worse	Similar
- Schools	Less than Significant	Better	Better	Similar	Worse	Similar
UTILITIES						
- Demand	Significant	Better	Better	Similar	Better	Similar
- Infrastructure	Significant	Better	Similar	Similar	Similar	Worse
GEOLOGIC AND SEISMIC HAZARDS	Less than					
	Significant	Better	Better	Similar	Similar	Similar
HISTORIC RESOURCES	Less than					
	Significant	Better	Similar	Similar	Similar	Worse

Source: PCR Services Corporation, December 2000.

Construction and operation of the hotel, retail/entertainment/restaurant, office/commercial and residential uses within the 27.1-acre Project area would not occur. Rather, the existing surface parking lots and the 40,000 square foot warehouse/mechanical facilities would remain as described in the Environmental Setting portions of this EIR. Existing environmental conditions would remain, as would existing zoning and land use designations. The properties within the Specific Plan Area and the other portions of the Project site would not be developed, and existing land uses would not be modified.

b. Environmental Impacts of the No Project Alternative

Land Use. The No Project Alternative would not increase the synergy between continuing activities at STAPLES Center, the Convention Center, and the general downtown area. The No Project Alternative would not support the STAPLES Center and the Convention Center with a convention hotel and related entertainment and retail activities, and would not promote the expansion of the Convention Center to accommodate and hold large national conventions. The No Project Alternative would not implement a number of City policies with respect to the Convention Center and South Park Area, concentration of development in the vicinity of transit stations and promotion of activity centers downtown. The No Project Alternative would not promote City land use objectives as compared to the Project. Impacts related to land use policy would be significant and worse compared to the Project. The No Project Alternative would not affect off-site land uses. Therefore, impacts to off-site land uses would be better under the No Project Alternative.

Visual Quality. Under the No Project Alternative, the Project site would retain the same land use configuration that is presently in place. No elements that would detract from the existing aesthetic character of the area would be introduced, no unique features would be demolished or removed, and no structures that would be incompatible with the height or bulk of existing structures would be developed. Existing public and private views of the site and surrounding land uses, including views of STAPLES Center and the Convention Center, would not be affected. However, this Alternative would not include any of the elements proposed under the Project that would have a beneficial effect on the aesthetic character of the area, such as the proposed pedestrian-oriented environment; the open space areas, landscape and streetscape elements that are proposed as part of the Project Design Guidelines; unifying design elements that create a visual linkage with STAPLES Center and the Convention Center; and the replacement of land uses (surface parking lots and warehouse/mechanical buildings), which do not possess unique or valuable aesthetic attributes or contribute demonstrably and positively to the local aesthetic character of the community. Based on these conditions, visual quality impacts under the No Project Alternative would be less than significant and much better compared to the Project.

Light and Glare. Existing development on-site exhibits relatively high ambient nighttime light levels (though less than the adjacent STAPLES Center or Convention Center) and moderate glare generation. As the project site would retain the existing land uses under the No Project

Alternative, ambient light levels and glare conditions would not change. However, this Alternative would not provide the beneficial effect associated with the Project's potential to moderately decrease glare conditions from surface parking lots. Existing light sources currently contribute to increased ambient nighttime illumination levels, which spill over onto and illuminate sensitive uses, resulting in a significant impact. However, this impact would be much better relative to the Project.

Shade/Shadow. Existing development on-site does not presently shade any off-site shadow-sensitive uses. As the Project site would retain the existing land uses under the No Project Alternative, current site-generated shadows would not change. Impacts would be less than significant and much better relative to the Project.

Population, Housing and Employment. The No Project Alternative would not result in an increase in population in the SCAG Region and the City of Los Angeles Subregion. As such, the Alternative would not substantially alter the location, distribution, density or growth rate of populations projected for the area. Implementation of the No Project Alternative would not result in an indirect or direct demand for housing. Therefore, No Project Alternative would not substantially alter the location, distribution, density or growth rate of housing planned for the area by local and regional plans. However, as housing would not increase as a result of implementation of this Alternative, several of the goals set forth in the *Community Plan* and the *South Park Development Strategies and Design Guidelines* would not be implemented. This Alternative would also not increase the housing to employment ratio. The No Project Alternative would not result in any demonstrable increase to local or regional employment. Therefore, implementation of this Alternative would not substantially alter the location, distribution, density or growth rate of employment planned for the area by local and regional plans. However, as employment opportunities would not increase as a result of implementation of this Alternative, the favorable impact on employment attributable to the Project would not occur with this Alternative. Impacts would be less than significant, but would be worse as compared with the Project.

Drainage and Surface Water Quality. The No Project Alternative would not result in any additional impacts on the existing storm drain system. No storm drain relocations, changes in the pattern of stormwater flows, increase in storm water flows, or increases in flooding potential would occur. The Project could necessitate the relocation of storm drain facilities. Impacts to the existing storm drain system would be less than significant and would be better compared to the Project.

The No Project Alternative would not include any additional construction activities, and therefore would not have a potential to generate construction-related surface water quality impacts. In comparison, the Project would include construction activities that could increase sediment transport in runoff during grading, and generate the potential for the discharge of hazardous materials used in construction. Potential construction-related surface water quality impacts would be less than significant under the Project with adherence to the Countywide general construction permit (NPDES) and other applicable regulations. The No Project Alternative would not increase traffic

during operations and would not generate traffic-related surface pollutant deposits. Water quality impacts would be less than significant and would be better compared to the Project.

Air Quality. The No Project Alternative would not include any additional construction activities or traffic and would not generate additional construction or operation-related air emissions. The Project would generate NO_x, PM₁₀, CO and ROC emissions that exceed SCAQMD regional significance thresholds for construction activities resulting in a significant and unavoidable impact on regional air quality. This impact, however, would be short-term in nature. Local air quality impacts associated with construction emissions would remain less than significant for the Project. During the operational phase, the Project would result in regional emissions that exceed SCAQMD significance thresholds for CO, NO_x, PM₁₀, and ROC. The mitigation measures identified for the Project would reduce these air quality impacts to the degree technically feasible, but emissions would remain above SCAQMD significance thresholds. Therefore, the Project would have a significant and unavoidable impact on regional air quality. No significant impacts to local air quality would result from the Project. The No Project Alternative would not result in any air quality impacts and, therefore, impacts would be much better relative to the Project.

Traffic. The No Project Alternative would not generate additional traffic and therefore would not reduce the level of service (LOS) at area intersections. Impacts to intersections and freeways would be much better compared to the Project.

Parking. The No Project Alternative would not generate additional demand for parking. The Project would satisfy the operational parking need through the construction of parking facilities containing at minimum Code-required parking. Neither the Project nor the No Project Alternative would result in a parking deficit and thus neither would result in parking impacts. Parking impacts would be similar to the Project.

Pedestrian Safety. The No Project Alternative would not generate additional pedestrian traffic and would not generate any additional pedestrian issues. Pedestrian safety impacts would be less than significant and better relative to the Project.

Hazardous Materials. The No Project Alternative would perpetuate the existing potential for employees of the area to be exposed to hazardous materials associated with existing hazardous materials waste sites, asbestos containing materials and contaminated soil, whereas, the Project would reduce existing hazards to persons, soil and groundwater by necessitating the identification and remediation of hazardous materials/waste sites. Impacts from potential exposure to existing hazards would be worse than the Project.

The No Project Alternative would not include construction activities and would not generate a potential for exposure of construction workers to existing hazardous materials. Grading and

construction activities under the Project could potentially pose a health hazard through the release of hazardous materials (i.e., contaminated soil, and asbestos containing materials in the case of the Project). Construction-related hazards would be better compared to the Project.

The No Project Alternative would perpetuate the existing level of use of hazardous material in on-site operations. The Project would also utilize small quantities of hazardous materials (cleaning fluids, oils, paints, etc.) during operations. The use of hazardous materials during operations would represent a significant but mitigable impact under either the Project or the No Project Alternative. The potential for exposure to hazardous materials during operations would be similar to the Project.

Noise. The No Project Alternative would not include additional on-site noise generators, not would it generate additional traffic noise on area roadways that would affect these uses. The Project is expected to generate significant and unavoidable short-term construction noise and significant traffic-related operational noise impacts. Noise impacts would be much better compared to the Project.

Fire. The No Project Alternative would not generate additional demand for fire protection services and would not generate fire flow, emergency vehicle access, or emergency response time impacts. The Project would generate: (1) adverse but less than significant demands for LAFD fire protection services; (2) a need for the development of emergency access lanes; (3) construction activities which could cause adverse but less than significant impacts to emergency fire response times; and (4) expansion to the existing water system and site-specific fire suppression improvements may be required. Fire protection service impacts would be less than significant under the No Project Alternative and better compared to the Project.

Police. The No Project Alternative would not generate additional demand for police services and would not impact police response times. The Project would generate: (1) an adverse but less than significant demand for additional LAPD police protection services and (2) construction activities which could result in adverse but less than significant impacts to LAPD emergency police response times. Police protection service impacts would be less than significant under the No Project Alternative and better compared to the Project.

Parks and Recreation. The No Project Alternative would not generate additional demand for parks and recreation services. The No Project Alternative would not provided the open space facilities associated with the Project. Parks and recreation impacts would be less than significant under the No Project Alternative and much better compared to the Project.

Schools. The No Project Alternative would not generate additional demand for school services. School impacts would be less than significant under the No Project Alternative and better compared to the Project.

Utilities. The No Project Alternative would not generate additional demand for water, sewer and solid waste services. Utilities impacts would be less than significant under the No Project Alternative and better compared to the Project.

As with the Project, the No Project Alternative would not require the extension of water and sewer lines to the Project site as the site is currently served by fully developed water and sewer systems, and would not require expansion of existing water and sewer line capacity. The No Project Alternative would not require the construction of service laterals to serve individual buildings. Infrastructure impacts would be better compared to the No Project Alternative.

Geologic and Seismic Hazards. As with the Project, the No Project Alternative would not expose additional persons or property to fault rupture, landslide or slope stability hazards. Both the Project and the No Project Alternative would expose persons and property to a potentially significant seismic hazard, though the No Project would expose a reduced number of people. Adherence to building seismic safety code requirements would minimize this hazard. Impacts from geologic and seismic hazards would be better compared to the Project.

Architectural/Historic Resources. The Project site contains two buildings, neither of which is either listed or eligible for listing as a federal, State, or local historic structure. As with the Project, the historic properties located adjacent to the Project site would not be significantly impacted under the No Project Alternative. Impacts with respect to historic resources would be better compared to the Project.

c. Relationship of Alternative to the Project Objectives

The No Project Alternative would not achieve the Project's and City's objectives. This Alternative would not achieve the Project objectives to create attractive new market-rate and affordable housing near downtown employment centers, to connect the site to the surrounding community through pedestrian, vehicular, and visual linkages, to create a major regional retail/entertainment center and mixed-use district that will complement STAPLES Center and serve as a catalyst for downtown and the Los Angeles Convention and Exhibition Center, to locate major entertainment facilities in the downtown, to establish a focused spatial relationship between the Project, STAPLES Center and the Convention Center which links these uses in a mutually beneficial manner, and to develop a properly sized convention hotel. City objectives to concentrate development next to mass transit facilities, to promote activity in the Convention Center area, help foster a Convention Center District, help foster the Figueroa Street corridor which links the City's

financial core to the Convention Center, and promote the redevelopment of the South Park Area, would also not be achieved under this Alternative but to a lesser degree. The No Project Alternative would thus be inferior to the Project with respect to achieving applicable project objectives.

d. Impact Summary

The No Project Alternative would have better or much better impacts compared to the Project with regard to land use (off-site uses), visual quality, light and glare, shade/shadow, drainage and surface water quality, air quality, traffic, pedestrian safety, noise, public services, utilities, geologic and seismic hazards, and historic resources. The Alternative would have worse impacts with regard to land use (land use policies), population, housing, and employment, and hazardous materials.

2. ALTERNATIVE B: REDUCED DENSITY ALTERNATIVE

a. Description of the Reduced Density Alternative

This section presents an environmental analysis of an alternative development aimed at reducing the potential Project impacts by lessening the amount of development, which would occur at the Project site by 30 percent. Under this Alternative, a 1,500-room convention hotel would be constructed.¹⁴¹ This provision has been incorporated into this Alternative. As this represents a 14 percent reduction in hotel development, the reductions in floor area of the Project's other land use components have been reduced in a manner so as to realize an overall 30 percent reduction in floor area across the Project site. Table 63 on page 462 compares this Alternative with the proposed Project for each of the major land use categories.

Under such an alternative, the resulting massing of buildings could take several forms. For example, building heights as anticipated within the proposed Project could be maintained, but fewer structures built. Or, building heights could be standardized in height, resulting in a relatively uniform development of lower structures. A third option, and the one adopted for the purposes of this analysis, assumes that all buildings would be reduced in height by approximately 30 percent, thus reflecting a lower but still varied range of building heights throughout the Project site. It is assumed that development within the various use categories would occupy the same area of the Project site as in the proposed Project, only with the reduced intensity.

¹⁴¹ *The number of hotel rooms analyzed in this Alternative differs from the minimum required in the existing Disposition and Development Agreement and the minimum set forth in the Equivalency Program.*

Table 63

**COMPARISON OF ALTERNATIVE B COMPONENTS:
REDUCED DENSITY TO PROPOSED PROJECT**

Project Component	Proposed Project	Alternative Project	Numerical Difference	Percent Change
Hotel	1,590,000 sq.ft. 1,800 rooms	1,367,000 sq.ft. 1,500 rooms	-223,000 sq.ft. -300 rooms	-14%
Retail/Entertainment/ Restaurant	1,115,000 sq.ft.	660,000 sq.ft.	-455,000 sq.ft.	-41%
Office/Commercial	425,000 sq.ft.	258,000 sq.ft.	-167,000 sq.ft.	-39%
Residential	870,000 sq.ft. 800 d.u.	516,000 sq.ft. 475 d.u.	-354,000 sq.ft. -325 d.u.	-41%
Total Floor Area	4,000,000 sq.ft.	2,801,000 sq.ft.	-1,200,000 sq.ft.	-30%

Source: PCR Services Corporation, December 2000.

b. Environmental Impacts of the Reduced Density Alternative

Land Use. As with the Project, the Reduced Density Alternative would create synergy between continuing activities at STAPLES Center, the Convention Center, and the general downtown area. The Reduced Density Alternative would support STAPLES Center and the Convention Center with a convention hotel and related entertainment and retail activities, and would promote the expansion of the Convention Center to accommodate and hold large national conventions but to a lesser degree than the Project. Both the Reduced Density Alternative and the Project would implement a number of City policies with respect to the Convention Center and South Park Area, concentration of development in the vicinity of transit stations and promotion of activity centers downtown. The Reduced Density Alternative would promote City land use objectives to a reduced degree compared to the Project. Therefore, impacts related to land use policy would be less than significant, but worse compared to the Project. Impacts to off-site land uses would be less than significant and better compared to the Project.

Visual Quality. The Reduced Density Alternative would include the elements proposed under the Project that would have a beneficial effect on the visual quality of the area. Such elements would include the pedestrian-oriented environment; the open space areas, landscaped and streetscape elements proposed as part of the Project Design Guidelines; unifying design elements creating a visual linkage with STAPLES Center and the Convention Center, and the replacement of land uses (surface parking lots and warehouse/mechanical buildings which do not possess unique or valuable aesthetic attributes or contribute demonstrably and positively to the local aesthetic character of the community. The Reduced Density Alternative would be prominent in the viewshed of some commercial and residential properties immediately north of the site and would obstruct views to the south, though to a lesser degree than the Project. The Reduced Density Alternative would present a contrast to some of the existing commercial and residential buildings located immediately to the north along Olympic Boulevard and east along Flower Street, however, this

contrast would be less than that associated with the Project. As with the Project, buildings would be constructed in accordance with established height zones. The maximum building heights would conform to current zoning requirements, and compliance with lot coverage restrictions. Implementation of the Reduced Density Alternative would not result in the irreversible removal of features that contribute positively to the site's visual character. As with the Project, the design of this Alternative could result in adverse impacts to visual quality. Therefore, impacts to visual quality would be significant under this Alternative, but better compared to the Project.

Light and Glare. On-site development would introduce new sources of light. Design features proposed as part of the Project, such as minimizing impacts on sensitive receptors, the use of building materials that minimize reflectivity and glare, and non-glare treatment of any glass building facades, would be implemented under this Alternative. As with the Project, this Alternative would result in a beneficial effect associated with the potential to moderately decrease glare conditions from surface parking lots. However, even with a 30 percent reduction, the Alternative would still contribute to an increase in ambient nighttime illumination levels that would spill over onto and illuminate adjacent sensitive uses, resulting in a significant impact. Light impacts would be better relative to the Project.

Shade/Shadow. Maximum and maximum supplemental building heights under the Reduced Density Alternative would be reduced in height approximately 30 percent to those of the Project. Correspondingly, the shadows cast by these buildings would be reduced 30 percent. Though winter shadows cast by the Olympic East Properties would be reduced from those of the Project, the maximum height would still shade two multi-family residential structures (adjacent to Francisco Street) for more than three hours. And as with the Project, the winter shadows cast by the maximum supplemental height of the Olympic North Properties under this Alternative would shade two multi-family residential structures (adjacent to Georgia Street) for more than three hours. However, the maximum height would not shade the multi-family residential structure for more than three hours that would be shaded by the Project's maximum height for the Olympic North Properties. As with the Project, the winter maximum supplemental height shadows cast by the Figueroa South Properties would shade Gilbert Lindsay Plaza for more than three hours. The Reduced Density Alternative would result in significant shading impacts to five off-site shadow-sensitive uses during the winter. No off-site shadow-sensitive uses would be impacted during the summer. Shade impacts would be better overall by approximately 30 percent relative to the Project.

Population, Housing and Employment. Implementation of this alternative would result in 2,400 dwelling units, a 1,600 dwelling unit increase over the proposed Project. This alternative would be expected to house 6,816 residents. This population growth represents 1.5 percent of the growth forecasted for the City of Los Angeles subregion for the years 2000 to 2010, consistent with the Land Use Alternative's contribution to the subregion's housing supply, and 81.7 percent of the growth assumed for the Central City Area. The population growth associated with implementation of this alternative would be within the population projections set forth for the subregion and the

Central City Area, but would be greater than under the proposed Project. However, the population growth associated with this alternative would not substantially alter the location, distribution, density or growth rate of populations projected for the area. In regard to consistency with regional growth forecasts, population and housing impacts would be worse compared to the proposed Project because this alternative would consume more of the available population and housing capacity. From a planning perspective, relative to planning documents such as the CRA's South Park Redevelopment Plan, population and housing impacts would be better than the proposed Project because of the provision of additional housing.

Due to a reduction in proposed floor area, the workforce generated as a result of construction and operation of the Reduced Density Alternative would be reduced as compared with the workforce generated by the Project. Table 65 on page 465 provides a listing of derived direct employment impacts that would be associated with the Reduced Density Alternative. An estimated net employment increase of 3,641 new jobs would result from the implementation of this Alternative. This represents a significant positive impact on employment in the downtown area. The Reduced Density Alternative is anticipated to add 1,349 residents and 3,641 jobs to the Central City area, a ratio of 2.70 jobs added for every resident added. It is anticipated that the location of these jobs within the Central City Area would improve the balance between jobs and housing, though not to as great of degree as the Project. Impacts would be less than significant and would be worse as compared with the Project.

Drainage and Surface Water Quality. Both the Reduced Density Alternative and the Project would maintain the existing pattern of on- and off-site flows, would avoid potential flood hazards and would not generate an increase in runoff and associated demand for storm drain capacity. Drainage impacts would be similar to those of the Project.

As with the Project, the Reduced Alternative would include construction activities that could increase sediment transport in runoff during grading, and generate the potential for the discharge of hazardous materials used in construction. Potential construction-related surface water quality impacts would be less than significant under either scenario with adherence to the Countywide general construction permit (NPDES) and other applicable regulations. As the same amount of acreage would be involved, construction-related surface water quality impacts would be equivalent with the Project. The Reduced Density Alternative would generate traffic during operations generating surface pollutant deposits but at a reduced level to that of the Project. The increase in pollutants in runoff would represent a small incremental and less than significant impact on receiving waters. Operation-related water quality impacts would be better compared to the Project.

Air Quality. Both the Project and the Reduced Density Alternative would generate NO_x, PM₁₀, CO, and ROC emissions that exceed SCAQMD regional significance thresholds for construction activities resulting in a significant and unavoidable impact on regional air quality. This

Table 65

ESTIMATED EMPLOYMENT CHANGE

Proposed Land Use (Reduced Density Alternative)	Employment Derivation Factor ^{a,b} (sq.ft./employee)	Floor Area (sq.ft.)	Jobs Created by Reduced Density Alternative
Convention Hotel	909	911,600	1,003
Hotel	909	455,400	501
Office	292	100,170	343
Medical Office	234	81,955	350
Health Club	680	75,875	111
Entertainment	680	287,085	422
Restaurant	250	127,265	509
Retail	577	<u>245,650</u>	<u>426</u>
Subtotal		<u>2,285,000</u>	<u>3,665</u>
Existing Parking Facilities	50,000	1,188,037	<u>(24)</u>
TOTAL NEW EMPLOYMENT (Reduced Density Alternative)			3,641
Project New Employment			<u>5,367</u>
Difference			-1,726

^a San Diego Association of Governments, *Traffic Generation Guide*, 1998.

^b The Reduced Density Alternative, as with the Project, will allow transfers among uses, however, such transfers will not result in less than 1,400 hotel rooms or 500 residential units

Source: PCR Services Corporation, December 2000.

impact, however, would be short-term in nature. Local air quality impacts associated with construction emissions would be less than significant and similar to the Project.

During the operational phase, both the Project and the Reduced Density Alternative would result in regional emissions that exceed SCAQMD significance thresholds for CO, NO_x, PM₁₀, and ROC. However, due to reduced traffic generation, these impacts would be reduced under the Reduced Density Alternative. The mitigation measures identified for the Project would reduce these air quality impacts to the degree technically feasible, but emissions would remain above SCAQMD significance thresholds. Therefore, as with the Project, operation of the Reduced Density Alternative would have a significant and unavoidable impact on regional air quality. No significant impacts to local air quality would result from either the Project or the Reduced Density Alternative. Air quality impacts would be better compared to the Project because vehicle travel would be reduced as a result of more residents being located in proximity to the downtown employment center.

Traffic. The Reduced Density Alternative would generate approximately 2,453 additional vehicle trips in the weekday P.M. peak hour and approximately 3,515 additional vehicle trips in the Saturday evening peak hour. These trip totals would be 32 percent and 36 percent less respectively than the additional trips generated by the Project. Traffic impacts would be significant, but better compared to the Project.

Parking. Both the Project and the Reduced Density Alternative would satisfy the operational parking need through the construction of parking facilities containing at minimum Code-required parking. Neither the Project nor the Reduced Density Alternative would result in a parking deficit, and thus neither would result in parking impacts. Parking impacts would be similar to the Project.

Pedestrian Safety. Both the Project and the Reduced Density Alternative would generate patrons who would be pedestrians for at least part of their trip. Pedestrian movement would similar to that of the Project but pedestrian numbers would be reduced. Pedestrian safety impacts would be less than significant and better compared to the Project.

Hazardous Materials. Both the Project and the Reduced Density Alternative would reduce existing hazards to persons, soil and groundwater by necessitating the identification and remediation of hazardous materials/waste sites. Potential exposure to existing hazards would be similar to the Project.

Grading and construction activities under either the Project or the Reduced Density Alternative could potentially pose a health hazard through the release of hazardous materials (i.e., contaminated soil, and asbestos containing materials in the case of the Project), a significant but mitigable impact. Construction-related hazards would similar to the Project.

As with the Project, the Reduced Density Alternative would utilize small quantities of hazardous materials (cleaning fluids, oils, paints, etc.) during operations. The use of hazardous materials during operations would represent a significant but mitigable impact under either the Project or the Reduced Density Alternative. The potential for exposure to hazardous materials during operations would be similar to the Project.

Noise. The Reduced Density Alternative is expected to generate significant and unavoidable short-term construction noise and significant traffic-related operational noise impacts but to a lesser degree than the Project due to the reduction of building floor area and the associated reduction in construction time and traffic generation. The Reduced Density Alternative would be anticipated to have better noise impacts compared to the Project.

Fire. Both the Reduced Density Alternative and the Project would generate: (1) adverse but less than significant demands for LAFD fire protection services; (2) a need for the development of emergency access lanes; (3) construction activities which could cause adverse but less than significant impacts to emergency fire response times; and (4) expansion to the existing water system and site-specific fire suppression improvements may be required. These less than significant impacts would be better compared to the Project due to the reduction of building floor area and the associated reduction in construction time and traffic generation.

Police. Both the Reduced Density Alternative and the Project would generate a cumulatively significant demand for additional LAPD police protection services. These effects would be better under the Reduced Density Alternative due to the reduction of building floor area and the associated reduction in construction time and traffic generation, although the cumulative impact on police protection services would remain significant.

Parks and Recreation. As the amount of floor area and type of residential uses proposed for the Reduced Density Alternative would be reduced overall by 30 percent, the Reduced Alternative's generation of residential population and the associated demand for parks and recreation services would be similarly reduced to that associated with the Project. However, the Reduced Density Alternative would not meet the Department of Recreation and Parks planning standard. Therefore, impacts would be significant and better compared to the Project.

Schools. As the amount of floor area and type of residential uses proposed for the Reduced Density Alternative would be reduced overall by 30 percent, the Reduced Density Alternative's generation of population and the associated generation of students would be similarly reduced to that associated with the Project. With mitigation, impacts would be less than significant and would be better compared to the Project.

Utilities. As the amount of floor area and type of land use proposed for the Reduced Density Alternative would be reduced overall 30 percent, the Reduced Density Alternative's generation of on-site population and the associated demand for water and generation of sewage and solid waste would be reduced similarly to that associated with the Project. With mitigation, impacts would be less than significant and would be better to the Project.

As with the Project, the Reduced Density Alternative would not require the extension of water and sewer lines to the Project site as the site is currently served by fully developed water and sewer systems, and would not require expansion of existing water and sewer line capacity. Infrastructure impacts would be similar to the Project.

Geologic and Seismic Hazards. As with the Project, the Reduced Density Alternative would not expose persons or property to fault rupture, landslide or slope stability hazards. Both the

Project and the Reduced Density Alternative would expose persons and property to a potentially significant seismic hazard, though the Reduced Density Alternative would expose a reduced number of people. Adherence to building seismic safety code requirements would minimize this hazard. Impacts from geologic and seismic hazards would be better compared to the Project.

Architectural/Historic Resources. The Project site does not contain any buildings that are either listed or may be eligible for listing as a federal, State, or local historic structure. As with the Project, the historic properties located adjacent to the Project site would not be significantly impacted under the Reduced Density Alternative. Impacts with respect to historic resources would be similar to the Project.

c. Relationship of Alternative to the Project Objectives

The Reduced Density Alternative would achieve the Project's and City's objectives but to a reduced degree. This Alternative would achieve the Project objectives to create attractive new market-rate and affordable housing near downtown employment centers, to connect the site to the surrounding community through pedestrian, vehicular, and visual linkages, to create a major regional retail/entertainment center and mixed-use district that will complement STAPLES Center and serve as a catalyst for downtown and the Los Angeles Convention and Exhibition Center, to locate major entertainment facilities in the downtown, to establish a focused spatial relationship between the Project, STAPLES Center and the Convention Center which links these uses in a mutually beneficial manner, and to develop a properly sized convention hotel. Due to the reduction in building floor area, these objectives would not be achieved to as great a degree as the Project. City objectives to concentrate development next to mass transit facilities, to promote activity in the Convention Center area, help foster a Convention Center District, help foster the Figueroa Street corridor which links the City's financial core to the Convention Center, and promote the redevelopment of the South Park Area, would also be achieved under this Alternative. The Reduced Density Alternative would achieve Project objectives, though to a lesser degree than the Project.

d. Impact Summary

Impacts under the Reduced Density Alternative would be better compared to the Project with regard to land use (off-site uses), visual quality, light and glare, shade/shadow, surface water quality, air quality, traffic, pedestrian safety, noise, public services, utilities, and geologic and seismic hazards. The Alternative would have worse impacts with regard to land use (land use policies) and employment.

3. ALTERNATIVE C: DESIGN ALTERNATIVE

a. Description of the Design Alternative

Under this Alternative the size of the Project is held constant, but the design of the Project is modified in response to design alternatives identified by the community-at-large as well in response to the principal environmental effects of the Project from a physical design perspective. Table 67 on page 470 compares this alternative with the Proposed Project for each of the major land use categories.

This Alternative, in relation to the proposed Project, incorporates four major changes to the design of the Project. These four changes are summarized as follows: (1) the convention hotel proposed for the Olympic Properties would be relocated so as to have a Figueroa Street frontage; (2) the central plaza proposed for the Olympic Properties would be relocated to also have a Figueroa Street frontage; (3) building heights would be lowered to eliminate significant shading impacts; and (4) signage will be limited to that permitted per applicable City code provisions. The latter two design changes are described in greater detail below.

The *Los Angeles Municipal Code* (Section 91.62 et seq.) provides a maximum of four square feet of combined signage area (monument, projecting, wall, illuminated architectural canopy, pole, roof, and window signs) for each linear foot of street frontage. The Project has an estimated 9,410 linear feet of street frontage, which would permit approximately 37,640 square feet of combined signage. The City Code also regulates the placement and orientation of signage by Project parcel.

b. Environmental Impacts of the Design Alternative

Land Use. As with the Project, the Alternative Design would create synergy between continuing activities at STAPLES Center, the Convention Center and the general downtown area. However, the synergy would be somewhat reduced with the focus of the entertainment and public gathering facilities moved toward Figueroa Boulevard. As event activities would be focused toward Figueroa Boulevard, operation-related impacts would be more apparent to off-site land uses. Impacts to off-site land use would be similar to the Project.

The Alternative Design would support STAPLES Center and the Convention Center with a convention hotel and related entertainment and retail activities, and would promote the expansion of the Convention Center to accommodate and hold large national conventions but would not promote the flow of pedestrian activities to the same level as the Project. Both the Alternative Design and the Project would implement a number of City policies with respect to the Convention Center and South Park Area, concentration of development in the vicinity of transit stations and promotion of activity centers downtown. The Alternative Design would promote City land use objectives to a reduced

Table 67

**COMPARISON OF ALTERNATIVE C COMPONENTS:
DESIGN ALTERNATIVE TO PROPOSED PROJECT**

Project Component	Proposed Project	Alternative Project	Numerical Difference	Percent Change
Hotel	1,590,000 sq.ft. 1,800 rooms	1,590,000 sq.ft. 1,800 rooms	0 sq.ft. 0 rooms	0%
Retail/Entertainment/ Restaurant	1,115,000 sq.ft.	1,115,000 sq.ft.	0 sq.ft.	0%
Office/Commercial	425,000 sq.ft.	425,000 sq.ft.	0 sq.ft.	0%
Residential	870,000 sq.ft. 800 d.u.	870,000 sq.ft. 800 d.u.	0 sq.ft. 0 d.u.	0%
Total Floor Area	4,000,000 sq.ft.	4,000,000 sq.ft.	0 sq.ft.	0%

Source: PCR Services Corporation, October 2000.

degree compared to the Project. Impacts related to land use policy would be worse compared to the Project.

Visual Quality. The Design Alternative would include the elements proposed under the Project that would have a beneficial effect on the aesthetic character of the area. Such elements would include the pedestrian-oriented environment; the open space areas, landscaped and streetscape elements proposed as part of the Project Design Guidelines; unifying design elements creating a visual linkage with STAPLES Center and the Convention Center, and the replacement of land uses (surface parking lots and warehouse/mechanical buildings) which do not possess unique or valuable aesthetic attributes or contribute demonstrably and positively to the local aesthetic character of the community. Furthermore, the Design Alternative would limit signage to that permitted per applicable City code provisions. The Design Alternative would be prominent in the viewshed of some commercial and residential properties immediately north of the site and would obstruct views to the south, though potentially to a lesser degree than the Project. The Design Alternative would present a contrast to some of the existing commercial and residential buildings located immediately to the north along Olympic Boulevard and east along Flower Street, however, this contrast would be similar to that associated with the Project. As with the Project, buildings would be constructed in accordance with established height zones. The maximum building heights would conform to current zoning requirements and compliance with lot coverage restrictions. However, the Alternative Design would relocate the proposed convention hotel to a Figueroa Street frontage, which would create an adverse wall-like effect. Visual quality impacts related to signage would be better compared to the Project. Visual quality impacts related to visual access would be worse relative to the Project.

Light and Glare. The Design Alternative on-site development would introduce new sources of light to the surrounding area. Design features proposed as part of the Project, such as minimizing impacts on sensitive receptors, the use of building materials that minimize reflectivity

and glare, and non-glare treatment of any glass building facades, would be implemented under this Alternative. As with the Project, this Alternative would result in a beneficial effect associated with the potential to moderately decrease glare conditions from surface parking lots. Orientation of the Project buildings more along a north-south axis (i.e., along Figueroa Street) would potentially increase the chance for reflective glare in morning and afternoon hours. In addition, a reduction in Project signage and associated illumination with the Alternative would still contribute to an increase in ambient nighttime illumination levels that would spill over onto and illuminate adjacent sensitive uses, resulting in a significant impact. In addition, by moving the convention hotel and central plaza to a Figueroa Street frontage, the Alternative's lighting may be more apparent to adjacent sensitive uses. Due to increased potential for glare and lighting orientation described above, light and glare impacts would be worse relative to the Project.

Shade/Shadow. Maximum and supplemental building heights under the Alternative Design would be equivalent to those of the Project. The tower for the Olympic East Properties and the associated maximum supplemental height would be moved from the northwest corner of the Olympic East Properties to the northeast corner, adjacent to Figueroa Street. Correspondingly, the shadows cast by the tower would shift further to the east. As the shift of the tower site would not change the overall maximum height of the Olympic East Properties, the maximum height winter shadows would still shade two multi-family residential structures (adjacent to Francisco Street) for more than three hours. In addition, the shift in tower location would increase the shading of the pool patio of the Hotel Figueroa. As with the Project, the maximum supplemental height for the Olympic North Properties would shade two multi-family residential structures (adjacent to Georgia Street) and the maximum height would shade one of these multi-family residential structures for more than three hours during the winter. And as with the Project, the winter maximum supplemental height shadows cast by the Figueroa South Properties would shade Gilbert Lindsay Plaza for more than three hours. The Design Alternative would result in significant shading impacts to five off-site shadow-sensitive uses during the winter. No off-site shadow-sensitive uses would be impacted during the summer. Shade impacts would be similar to the Project.

Population, Housing and Employment. As the amount of floor area and type of land use proposed for the Design Alternative would be consistent with the Project, the Design Alternative's generation of population, housing, and employment would be equivalent to that associated with the Project. Impacts would be less than significant and would be similar to the Project.

Drainage and Surface Water Quality. Both the Alternative Design and the Project would maintain the existing pattern of on- and off-site flows, would avoid potential flood hazards and would not generate an increase in runoff and associated demand for storm drain capacity. Drainage impacts would be similar to those of the Project.

As with the Project, the Alternative Design would include construction activities that could increase sediment transport in runoff during grading, and generate the potential for the discharge of

hazardous materials used in construction. Potential construction-related surface water quality impacts would be less than significant under either scenario with adherence to the Countywide general construction permit (NPDES) and other applicable regulations. As the same amount of acreage would be involved, construction-related surface water quality impacts would be equivalent with the Project. The Alternative Design would generate traffic during operations generating surface pollutant deposits at an equivalent level to that of the Project. The increase in pollutants in runoff would represent a small incremental and less than significant impact on receiving waters. Operation-related water quality impacts would be similar to the Project.

Air Quality. Both the Project and Alternative Design would generate NO_x, PM₁₀, CO and ROC emissions that exceed SCAQMD regional significance thresholds for construction activities resulting in a significant and unavoidable impact on regional air quality. This impact, however, would be short-term in nature. Local air quality impacts associated with construction emissions would remain less than significant for both the Project and the Alternative Design. During the operational phase, both the Project and the Alternative Design would result in regional emissions that exceed SCAQMD significance thresholds for CO, NO_x, PM₁₀, and ROC. The mitigation measures identified for the Project would reduce these air quality impacts to the degree technically feasible, but emissions would remain above SCAQMD significance thresholds. Therefore, as with the Project, operation of the Alternative Design would have a significant and unavoidable impact on regional air quality. No significant impacts to local air quality would result from either the Project or the Alternative Design. Air quality impacts would be similar to the Project.

Traffic. The Design Alternative would generate the same number of vehicle trips, and would have the same traffic impacts as the Project. Traffic impacts would be similar to the Project.

Parking. Both the Project and the Alternative Design would satisfy the operational parking need through the construction of parking facilities containing at minimum Code-required parking. Neither the Project nor the Alternative Design would result in a parking deficit and thus neither would result in parking impacts. Parking impacts would be similar with the Project.

Pedestrian Safety. Both the Project and the Alternative Design would generate patrons who would be pedestrians for at least part of their trip. However, the Alternative Design would concentrate more pedestrian activity on Figueroa Street compared to the Proposed Project, thereby increasing the possibility of pedestrian/vehicular conflicts. Pedestrian safety impacts would be less than significant, but worse than the Project.

Hazardous Materials. Both the Project and the Alternative Design would reduce existing hazards to persons, soil and groundwater by necessitating the identification and remediation of hazardous materials/waste sites. Potential exposure to existing hazards would be similar to the Project.

Grading and construction activities under either the Project or the Alternative Design could potentially pose a health hazard through the release of hazardous materials (i.e., contaminated soil, and asbestos containing materials in the case of the Project), a significant but mitigable impact. Construction-related hazards would be similar with the Project.

As with the Project, the Alternative Design would utilize small quantities of hazardous materials (cleaning fluids, oils, paints, etc.) during operations. The use of hazardous materials during operations would represent a significant but mitigable impact under either the Project or the Alternative Design. The potential for exposure to hazardous materials during operations would be similar to the Project.

Noise. The Alternative Design is expected to generate significant short-term construction noise and significant traffic-related operational noise impacts but to a slightly greater degree than the Project due to the location of the events plaza toward Figueroa Boulevard. The Alternative Design would be anticipated to have worse noise impacts compared to the Project.

Fire. Both the Alternative Design and the Project would generate: (1) adverse but less than significant demands for LAFD fire protection services; (2) a need for the development of emergency access lanes; (3) construction activities which could cause adverse but less than significant impacts to emergency fire response times; and (4) expansion to the existing water system and site-specific fire suppression improvements may be required. These less than significant impacts would be similar under the Alternative Design due to the equivalent building floor area and the associated construction time and traffic generation.

Police. Both the Alternative Design and the Project would generate a cumulatively significant demand for additional LAPD police protection services. These less than significant impacts would be similar under the Alternative Design due to the equivalent building floor area and the associated construction time and traffic generation.

Parks and Recreation. As the amount of floor area and type of residential uses proposed for the Alternative Design would be similar to the Project, the Alternative Design's generation of residential population and the associated demand for parks and recreation services would be similar to that associated with the Project.

Schools. As the amount of floor area and type of residential uses proposed for the Alternative Design would be equivalent to the Project, the Alternative Design's generation of residential population and the associated generation of students would be equivalent to that associated with the Project. With mitigation, impacts would be less than significant and would be similar to the Project.

Utilities. As the amount of floor area and type of land uses proposed for the Alternative Design would be equivalent to the Project, the Alternative Design's associated demand for water and generation of sewage and solid waste would be similar to that associated with the Project. With mitigation, impacts would be less than significant and would be similar to the Project.

As with the Project, the Alternative Design would not require the extension of water and sewer lines to the Project site as the site is currently served by fully developed water and sewer systems, and would not require expansion of existing water and sewer line capacity. Infrastructure impacts would be similar under the Alternative Design.

Geologic and Seismic Hazards. As with the Project, the Alternative Design would not expose persons or property to fault rupture, landslide, or slope stability hazards. Both the Project and the Alternative Design would expose persons and property to a potentially significant seismic hazard. Adherence to building seismic safety code requirements would minimize this hazard. Impacts from geologic and seismic hazards would be better compared to the Project.

Architectural/Historic Resources. The Project site does not contain any buildings that are either listed or may be eligible for listing as a federal, State, or local historic structure. As with the Project, the historic properties located adjacent to the Project site would not be significantly impacted under the Alternative Design. Impacts with respect to historic resources would be similar to the Project.

c. Relationship of Alternative to the Project Objectives

The Alternative Design would achieve some, but not all of the Project's and the City's objectives. This Alternative would achieve the Project objectives to create attractive new market-rate and affordable housing near downtown employment centers; to connect the site to the surrounding community through pedestrian; vehicular, and visual linkages; to create a major regional retail/entertainment center and mixed-use district that will complement STAPLES Center and serve as a catalyst for downtown and the Los Angeles Convention and Exhibition Center; to locate major entertainment facilities in the downtown; to establish a focused spatial relationship between the Project, STAPLES Center and the Convention Center which links these uses in a mutually beneficial manner; and to develop a properly sized convention hotel. The Alternative Design would not promote the flow of pedestrian activities, instead focusing pedestrian entry onto Figueroa Street and not throughout the entire Project site. The Alternative Design would also not create the desired synergy between STAPLES Center, the Convention Center, and the surrounding community to the same level as the Project. City objectives to concentrate development next to mass transit facilities; to promote activity in the Convention Center area; to help foster a Convention Center District; to help foster the Figueroa Street corridor which links the City's financial core to the Convention Center; and to promote the redevelopment of the South Park Area would not be achieved as completely under this Alternative, by locating the Project focus away from the primary

center of activity that has evolved around the corner of Figueroa and 11th Streets during STAPLES Center and Convention Center events. The Alternative Design would thus be inferior to the Project with respect to achieving applicable Project objectives.

d. Impact Summary

The Alternative Design would have a worse impact than the Project with regard to visual quality (visual access), light and glare (by orienting Project buildings more along a north-south axis, thus increasing the potential for reflective glare in morning and afternoon hours), pedestrian safety, and noise. The Alternative Design would have equivalent impacts with regard to shade and shadow effects on surrounding sensitive land uses, except that it would increase the expected summer afternoon shading of the rear patio/pool of the Hotel Figueroa. The Alternative would have better impacts to visual quality (signage).

4. ALTERNATIVE D: LAND USE ALTERNATIVE

a. Description of the Land Use Alternative

This section presents an environmental analysis of an alternative project in which all hotel, retail/entertainment/restaurant and office/commercial development proposed for the Project, except for some retail development, would be converted to residential units. This Alternative would substitute approximately 2,400 housing units for approximately 1,740,000 square feet of non-residential development. Under this alternative, 194,000 square feet of retail development would be retained solely for the purpose of providing neighborhood-oriented retail facilities, which support the on-site residential uses. A comparison of this alternative with the proposed Project is presented in Table 69 on page 476.

b. Environmental Impacts of the Land Use Alternative

Land Use. The Alternative Land Use would support STAPLES Center and the Convention Center with a convention hotel and related retail activities but to a lesser degree than the Project and would not provided related entertainment activities. The Alternative Land Use would not create as great a synergy between continuing activities at STAPLES Center, the Convention Center and the general downtown area. The Alternative Land Use would promote City land use objectives to a reduced degree compared to the Project. Thus, impacts related to land use policies would be greater than the Project. Impacts to off-site land use would be better under the Alternative Land Use due to the reduction of hotel and entertainment floor area.

Visual Quality. The Land Use Alternative would include the elements proposed under the Project that would have a beneficial effect on the aesthetic character of the area, however,

Table 69

**COMPARISON OF ALTERNATIVE D COMPONENTS:
LAND USE ALTERNATIVE TO PROPOSED PROJECT**

Project Component	Alternative Project	Proposed Project	Numerical Difference	Percent Change
Hotel	1,237,000 sq.ft. 1,400 rooms	1,590,000 sq.ft. 1,800 rooms	-353,000 sq.ft. -400 rooms	-78%
Retail/Entertainment/ Restaurant	153,000 sq.ft.	1,115,000 sq.ft.	-962,000 sq.ft.	-86%
Office/Commercial	0 sq.ft.	425,000 sq.ft.	-425,000 sq.ft.	-100%
Residential	2,610,000 sq.ft. <u>2,400 d.u.</u>	870,000 sq.ft. <u>800 d.u.</u>	+1,740,000 sq.ft. <u>+1,600 d.u.</u>	<u>+200%</u>
Total Floor Area	4,000,000 sq.ft.	4,000,000 sq.ft.	0 sq.ft.	0%

Source: PCR Services Corporation, December 2000.

application of some of these elements may be reduced. Such elements would include the pedestrian-oriented environment; the open space areas, landscaped and streetscape elements proposed as part of the Project Design Guidelines; unifying design elements creating a visual linkage with the STAPLES Center and the Convention Center, and the replacement of land uses (surface parking lots and warehouse/mechanical buildings) which do not possess unique or valuable aesthetic attributes or contribute demonstrably and positively to the local aesthetic character of the community. It is likely that some of the elements that would contribute to a sense of place reflecting the unique identity of the area, such as the Central Plaza, signage, and unifying design elements creating a visual linkage with the STAPLES Center and the Convention Center, would be reduced or eliminated. As with the Project, the Land Use Alternative would be prominent in the viewshed of some commercial and residential properties immediately north of the site and would obstruct views to the south. The Land Use Alternative would present a contrast to some of the existing commercial and residential buildings located immediately to the north along Olympic Boulevard and east along Flower Street, however, the contrast to the residential buildings would be less than that associated with the Project. As with the Project, buildings would be constructed in accordance with established height zones. The maximum building heights would conform to current zoning requirements, and compliance with lot coverage restrictions. As with the Project, the design of this Alternative could result in adverse impacts to visual quality. Therefore, impacts to visual quality would be significant under this Alternative, but better compared to the Project.

Light and Glare. The Land Use Alternative on-site development would introduce new sources of light to the site. Design features proposed as part of the Project, such as minimizing impacts on sensitive receptors, the use of building materials that minimize reflectivity and glare, and non-glare treatment of any glass building facades, would be implemented under this Alternative. As with the Project, this Alternative would result in a beneficial effect associated with the potential to moderately decrease glare conditions from surface parking lots. This Alternative would not involve nighttime illumination associated with special-event lighting and entertainment. Illumination

associated with signage would also be reduced in comparison to the Project. However, even with a reduction in overall illumination levels, the Alternative would still contribute to an increase in ambient nighttime illumination levels, which would spill over onto and illuminate adjacent sensitive uses. Light and glare impacts would be better relative to the Project, principally through the elimination of special event and reduced signage.

Shade/Shadow. Maximum and supplemental building heights under the Land Use Alternative would be equivalent to those of the Project, except for the tower element for the Olympic East Properties. Building massing would presumably be similar to the Project's residential uses proposed for Figueroa Central Properties (i.e., FAR of 6.0), with height ranging from 100 feet to 450 feet over limited portions of the site. In addition, the character and design of the buildings within the Land Use Alternative would likely allow for the creation of greater active open space areas, which would, themselves, reduce shading impacts, but which may be shaded by adjacent buildings during most of the year. Depending upon the location and massing of buildings under the Land Use Alternative, they would likely result in equivalent shading impacts to three, and maybe five off-site shadow-sensitive uses during the winter. No off-site shadow-sensitive uses would be impacted during the summer. Shade impacts would be better relative to the Project.

Implementation of this alternative would result in 2,400 dwelling units, a 1,600 dwelling unit increase over the proposed Project. This alternative would be expected to house 6,816 residents. This population growth represents 1.5 percent of the growth forecasted for the City of Los Angeles subregion for the years 2000 to 2010, consistent with the Land Use Alternative's contribution to the subregion's housing supply, and 81.7 percent of the growth assumed for the Central City Area. The population growth associated with implementation of this alternative would be within the population projections set forth for the subregion and the Central City Area, but would be greater than under the proposed Project. However, the population growth associated with this alternative would not substantially alter the location, distribution, density or growth rate of populations projected for the area. In regard to consistency with regional growth forecasts, population and housing impacts would be worse compared to the proposed Project because this alternative would consume more of the available population and housing capacity. From a planning perspective, relative to planning documents such as the CRA's South Park Redevelopment Plan, population and housing impacts would be better than the proposed Project because of the provision of additional housing.

Due to the reduction in proposed floor area for hotel, retail/entertainment/ restaurant, and office/commercial uses, the workforce generated as a result of construction and operation of this alternative would be reduced as compared with the workforce generated by the Project. It is anticipated that the location of these jobs within the Central City Area would improve the balance between jobs and housing, though not as great of degree as the Project. Impacts would be less than significant and would be worse as compared with the Project.

Drainage and Surface Water Quality. Both the Alternative Land Use and the Project would maintain the existing pattern of on- and off-site flows, would avoid potential flood hazards and would not generate an increase in runoff and associated demand for storm drain capacity. Drainage impacts would be similar to those of the Project.

As with the Project, the Alternative Land Use would include construction activities that could increase sediment transport in runoff during grading, and generate the potential for the discharge of hazardous materials used in construction. Potential construction-related surface water quality impacts would be less than significant under either scenario with adherence to the Countywide general construction permit (NPDES) and other applicable regulations. As the same amount of acreage would be involved, construction-related surface water quality impacts would be equivalent with the Project. The Alternative Land Use would generate traffic during operations which in turn would generate surface pollutant deposits at an equivalent level to that of the Project. The increase in pollutants in runoff would represent a small incremental and less than significant impact on receiving waters. Operation-related water quality impacts would be similar to the Project.

Air Quality. Both the Project and Alternative Land Use would generate NO_x, PM₁₀, CO, and ROC emissions that exceed SCAQMD regional significance thresholds for construction activities resulting in a significant and unavoidable impact on regional air quality. This impact, however, would be short-term in nature. Local air quality impacts associated with construction emissions would remain less than significant for both the Project and the Alternative Land Use.

During the operational phase, both the Project and the Alternative Land Use would result in regional emissions that exceed SCAQMD significance thresholds for CO, NO_x, PM₁₀, and ROC. The mitigation measures identified for the Project would reduce these air quality impacts to the degree technically feasible, but emissions would remain above SCAQMD significance thresholds. Therefore, as with the Project, operation of the Alternative Land Use would have a significant and unavoidable impact on regional air quality. No significant impacts to local air quality would result from either the Project or the Land Use Alternative. Air quality impacts would be better compared to the Project.

Traffic. The Land Use Alternative would generate approximately 1,136 additional vehicle trips in the weekday P.M. peak hour and approximately 1,091 additional vehicle trips in the Saturday evening peak hour. These trip totals would be 68 to 79 percent respectively than the additional trips generated by the Project. Although significant impacts would likely remain, impacts would be better compared to the Project.

Parking. Both the Project and the Alternative Land Use would satisfy the operational parking need through the construction of parking facilities containing at minimum Code-required parking. Neither the Project nor the Alternative Land Use would result in a parking deficit and thus neither would result in parking impacts. Parking impacts would be similar to the Project.

Pedestrian Safety. Both the Project and the Alternative Land Use would generate patrons who would be pedestrians for at least part of their trip. Pedestrian movement would not be as conducive to flow, as would that of the Project. Pedestrian safety impacts would be less than significant and worse than the Project.

Hazardous Materials. Both the Project and the Alternative Land Use would reduce existing hazards to persons, soil and groundwater by necessitating the identification and remediation of hazardous materials/waste sites. Potential exposure to existing hazards would be similar to the Project.

Grading and construction activities under either the Project or the Alternative Land Use could potentially pose a health hazard through the release of hazardous materials (i.e., contaminated soil, and asbestos containing materials in the case of the Project), a significant but mitigable impact. Construction-related hazards would be similar to the Project.

As with the Project, the Alternative Land Use would utilize small quantities of hazardous materials (cleaning fluids, oils, paints, etc.) during operations. The use of hazardous materials during operations would represent a significant but mitigable impact under either the Project or the Alternative Land Use. The potential for exposure to hazardous materials during operations would be similar to the Project.

Noise. The Alternative Land Use is expected to generate significant and unavoidable short-term construction noise and significant traffic-related operational noise impacts but to a lesser degree than the Project due to the reduction in entertainment and retail floor area. The Alternative Land Use would be anticipated to have better noise impacts compared to the Project.

Fire. Both the Alternative Land Use and the Project would generate: (1) adverse but less than significant demands for LAFD fire protection services; (2) a need for the development of emergency access lanes; (3) construction activities which could cause adverse but less than significant impacts to emergency fire response times; and (4) expansion to the existing water system and site-specific fire suppression improvements may be required. These less than significant impacts would be better under the Alternative Land Use due to the reduction in Project event activities.

Police. Both the Alternative Land Use and the Project would generate: (1) an adverse but less than significant demand for additional LAPD police protection services and (2) construction activities which could result in adverse but less than significant impacts to LAPD emergency police response times. These less than significant impacts would be better under the Alternative Land Use due to the reduction in Project event activities.

Parks and Recreation. As the amount of residential floor area proposed for the Alternative Land Use would be greater than for the Project, the Alternative Land Use would result in significantly higher demand for parks and recreational facilities associated with generation of residential population. Impacts would be significant and worse than the Project.

Schools. As the amount of residential floor area proposed for the Alternative Land Use would be greater than the Project, the Alternative Land Use's generation of residential population and the associated generation of students would be greater than the Project. With mitigation, impacts would be less than significant and would be worse than the Project.

Utilities. The Alternative Land Use would generate a reduced demand for water and generation of sewer and solid waste, as shown in Table 71 on page 481, Table 73 on page 482, and Table 75 on page 482, respectively. With mitigation, impacts would be less than significant and would be better than the Project.

As with the Project, the Alternative Land Use would not require the extension of water and sewer lines to the Project site as the site is currently served by fully developed water and sewer systems, and would not require expansion of existing water and sewer line capacity. Infrastructure impacts would be similar under the Alternative Land Use.

Geologic and Seismic Hazards. As with the Project, the Alternative Land Use would not expose persons or property to fault rupture, landslide or slope stability hazards. Both the Project and the Alternative Land Use would expose persons and property to a potentially significant seismic hazard. Adherence to building seismic safety code requirements would minimize this hazard. Impacts from geologic and seismic hazards would be similar to the Project.

Architectural/Historic Resources. The Project site does not contain any buildings that are either listed or may be eligible for listing as a federal, State, or local historic structure. As with the Project, the historic properties located adjacent to the Project site would not be significantly impacted under the Alternative Land Use. Impacts with respect to historic resources would be similar to the Project.

c. Relationship of Alternative to the Project Objectives

The Alternative Land Use would achieve some of the Project's and the City's objectives. This Alternative would achieve the Project objectives to create attractive new market-rate and affordable housing near downtown employment centers, to concentrate development next to mass transit facilities, and to connect the site to the surrounding community through pedestrian, vehicular, and visual linkages. The Alternative would not achieve the objectives to create a major regional retail/entertainment center and mixed-use district that will complement STAPLES Center and serve

Table 71

ALTERNATIVE D (ALTERNATIVE LAND USE) WATER DEMAND

Use	Size/Units	Water Demand Factor (gpd/unit)	Water Demand (gpd)
Retail	76,500 sq. ft.	0.096	7,344
Dining	76,500 sq. ft.	Gpm	183,600
Hotel	1,400 rooms	Gpm	218,400
Hotel—Meeting/Ball Rooms	100,000 sq. ft.	Gpm	85,200
Residential	2,400 units	192	<u>460,800</u>
Alternative Total			955,340
Project Total			<u>1,660,140</u>
Difference			-704,800

Source: Psomas Associates, Inc., September 2000.

as a catalyst for downtown and the Los Angeles Convention and Exhibition Center, to locate major entertainment facilities in the downtown, to establish a focused spatial relationship between the Project, STAPLES Center, and the Convention Center which links these uses in a mutually beneficial manner, and to develop a properly sized convention hotel. City objectives, to promote activity in the Convention Center area, help foster a Convention Center District, help foster the Figueroa Street corridor which links the City's financial core to the Convention Center, and promote the redevelopment of the South Park Area, would also not be achieved under this Alternative. The Alternative Land Use would thus be inferior to the Project with respect to achieving applicable Project objectives.

d. Impact Summary

The Land Use Alternative would have better impacts compared to the Project with regard to land use (off-site uses), light and glare, shade/shadow, noise, public services (fire and police), and utilities. The Alternative would have worse impacts with regard to land use (land use policies), pedestrian safety, and public services (parks and schools).

5. ALTERNATIVE E: ALTERNATIVE SITE

a. Description of the Alternative Site Alternative

The Alternative Site selected for analysis is the Cornfields site, located outside the Central Business District northeast of Chinatown in the City of Los Angeles. This Alternative Site was selected because it is currently an underutilized site of adequate size near the Central City area.

Table 73

**ALTERNATIVE D (ALTERNATIVE LAND USE) SEWAGE
GENERATION**

Use	Size/Units	Sewer Generation (gpd)
Retail	76,500 sq. ft.	6,120
Dining	76,500 sq. ft.	153,000
Hotel	1,400 rooms	182,000
Hotel—Meeting/Ball Rooms	100,000 sq. ft.	71,000
Residential	2,400 DU	<u>384,000</u>
Alternative Total		725,120
Project Total		<u>1,383,450</u>
Difference		<u>-658,330</u>

Source: Psomas Associates, Inc., September 2000.

Table 75

ALTERNATIVE D (ALTERNATIVE LAND USE) SOLID WASTE GENERATION

Site Use	Units/ Floor area	Generation Factor	Daily Generation (lbs/day)	Annual Generation (tons/yr)
Retail	76,500 sq.ft.	5 lbs./1,000 sq.ft.	382.5	69.8
Restaurant(s)	76,500 sq.ft.	50 lbs./1,000 sq.ft.	3,825	698.0
Hotel	1,400 rooms	2 lbs./room	2,800	511.0
Hotel Meeting Rooms	100,000 sq.ft.	5 lbs./1,000 sq.ft.	500	91.0
Residential	2,400 units	4 Lbs./unit	<u>9,600</u>	<u>1,752</u>
Alternative Total			17,107	3,121.8
Project Total			<u>31,170</u>	<u>5,414.5</u>
Difference			-14,063	-2292.7

Source: PCR Services Corporation, December 2000.

Under the Alternate Site (Cornfields) Alternative, hereafter referred to as the Cornfields Alternative, the Project, inclusive of all proposed land uses and floor area would be developed on approximately 27.1 acres at the Cornfields site. The Cornfields site is bounded generally by North Broadway, North Spring Street, College Street and Baker Street, and includes vacant land and inactive railroad track. No direct freeway access is provided to this site and no direct transit access is currently available. Surface street access is provided from North Broadway and North Spring Street.

b. Environmental Impacts of the Alternative Site Alternative

Land Use. Existing land uses at the Cornfields site include railroad trackage, automobile storage area and vacant land. The Cornfields Alternative would replace these uses with hotel, retail, entertainment, restaurant, and office uses.

The land uses adjacent to the Cornfields site include: commercial, industrial, residential, institutional,¹⁴² park, and vacant uses across North Broadway to the north; industrial, commercial, and vacant uses across North Spring Street to the south; institutional uses¹⁴³ across the Los Angeles River to the east; and parking, commercial, and industrial uses directly adjacent to the site to the west. The Cornfields Alternative would not create synergy between continuing activities at STAPLES Center, the Convention Center and the general downtown area. Given the close proximity of the Cornfields site to multiple sensitive uses (i.e., residential, religious, institutional, parks), the Cornfields Alternative would be expected to cause significant impacts to a greater number of off-site uses than the Project. Impacts to off-site land use would thus be worse under the Cornfields Alternative.

The City's *Central City North Community Plan* designates the Cornfield site as Light Industrial and as a Cultural/Historical Site.¹⁴⁴ The Restricted Light Industrial Designation (MR2-1 zoning) permits only industrial uses and specifically prohibits unrelated commercial and other non-industrial uses. A Conditional Use Permit (CUP) would permit the development of hotel, retail, entertainment, restaurant, and office uses. The City has not adopted redevelopment goals for the Cornfields site as it has for the Project site. Unlike the Project, the Cornfields Alternative would not support STAPLES Center and the Convention Center with a convention hotel and related entertainment and retail activities, and would not promote the expansion of the Convention Center to accommodate and hold large national conventions. The Cornfields Alternative would thus not relate to City redevelopment objectives. The Project would implement a number of City policies with respect to the Convention Center and South Park Area, concentration of development in the vicinity of transit stations and promotion of activity centers downtown. The Cornfields Alternative would thus be inferior to the Project with regard to promoting City land use objectives. Impacts related to land use policy would be worse compared to the Project.

Visual Quality. As with the Project, the Cornfields Alternative would include signage, which would require a variance from or modification to the City's sign regulations. Also similar to the Project, the Cornfields Alternative would avoid the removal of aesthetically unique features and

¹⁴² These include St. Petersburg Italian Catholic Church, and the Casa Italiana Social Center.

¹⁴³ These include the Young Nak Church of L.A., and the Downey Recreation Center and Pool.

¹⁴⁴ The City's *Central City North Community Plan* is the only source of designation of the Cornfields site as a cultural/historic resource. Notwithstanding, the River Station, within the Cornfields site, is listed as a designated City Cultural/Historical Monument.

would improve the visual quality of the respective area. However, unlike the Project, the Cornfields Alternative would not create a visual linkage with the STAPLES Center and the Convention Center. The Cornfields Alternative would be prominent in the viewshed of some commercial, industrial, and residential properties surrounding the site and could obstruct views, though due to the lower ground elevation, to a lesser degree than the Project. This Alternative would exceed zoning height and bulk standards and thus include a building of a scale out of character with adjacent development, which would be a significant impact. Therefore, development of the Cornfields Alternative would result in significant impacts associated with visual quality. Impacts would be worse than those of the Project.

Light and Glare. Design features proposed as part of the Project, such as minimizing impacts on sensitive receptors, the use of building materials that minimize reflectivity and glare, and non-glare treatment of any glass building facades, would be implemented under this Alternative. Both the Cornfields Alternative and the Project would introduce new sources of nighttime lighting, including lit signage in their respective areas of downtown Los Angeles, which would result in significant unavoidable impacts. Existing sensitive receptors in the vicinity of the Project site include residential and hotel uses, which could be impacted by nighttime lighting and glare associated with the Project. Existing sensitive receptors in the vicinity of the Cornfields site include primarily multi-family residential uses north of the site. Existing ambient lighting on the Cornfields site is low. Introduction of a brightly lit entertainment district would represent a substantial increase in lighting conditions, which could impact the surrounding residential uses (across Broadway to the north). Since the residential community adjacent to the Cornfields site is more defined and cohesive than the scattered sensitive uses adjacent to the Project site, the perceived impact of such an increase in ambient lighting conditions would be greater. Light impacts would therefore be worse under the Cornfields Alternative.

Shade/Shadow. The Cornfields site is located adjacent to five shadow-sensitive uses. These include the St. Peters Italian Catholic Church, Casa Italiana Social Center, and residential uses across Broadway to the north, and the Young Nak Church of L.A., and Downey Recreation Center and Pool across the Los Angeles River to the east. The nearest of these uses is located approximately 100 feet from the proposed Alternative footprint. Also, the Cornfields site is located at a ground elevation approximately 40 feet below these uses (which would reduce the length of any shadow from the Cornfields site). The Cornfields Alternative would not result in significant winter or summer shading impacts to any shadow-sensitive uses. Shading impacts would be better under the Cornfields Alternative.

Population, Housing and Employment. Currently, the Cornfields site does not contain any residential population and only a few, if any, employees associated with on-site automobile storage facilities. As the amount of floor area and type of land use proposed for the Cornfields Alternative would be consistent with the Project, the Cornfields Alternative's generation of population, housing, and employment would be similar to that associated with the Project. Impacts would be less than significant and would be similar to the Project.

Drainage and Surface Water Quality. Both the Cornfields Alternative and the Project would: (1) maintain the existing pattern of on- and off-site flows; and (2) avoid potential flood hazards.¹⁴⁵ The Alternative would not necessitate the relocation of existing storm drains, as would the Project because no existing storm drains bisect the Cornfields site. The Alternative would generate a greater incremental increase in runoff and associated demand for storm drain capacity than the Project because it would convert more acreage to impervious surfaces.¹⁴⁶ Unlike the existing drainage system serving the Project, it is likely that the existing storm drain system serving the Cornfields site would require improvement to accommodate project-related flows, which would constitute a significant impact. Drainage impacts would thus be worse under the Cornfields Alternative.

As with the Project, the Cornfields Alternative would include construction activities that could increase sediment transport in runoff during grading, and generate the potential for the discharge of hazardous materials used in construction. Potential construction-related surface water quality impacts would be less than significant under either scenario with adherence to the Countywide general construction permit (NPDES) and other applicable regulations. Construction-related surface water quality impacts would be equivalent with the Project. The Cornfields Alternative would generate traffic during operations equivalent to the Project, generating surface pollutant deposits. Concentration of pollutants in storm water runoff would be equivalent to the Project. The increase in pollutants in runoff would represent a small incremental and less than significant impact on receiving waters, and would not impair the beneficial uses of these waters. Operation-related water quality impacts would be similar with the Project.

Air Quality. The Cornfields site is directly adjacent to sensitive uses to the north (i.e., St. Peters Italian Catholic Church, Casa Italiana Social Center, and residential uses, all of which are across Broadway). Both the Project and this Alternative would generate NO_x, PM₁₀, CO and ROC emissions that exceed SCAQMD regional significance thresholds for construction activities resulting in a significant and unavoidable impact on regional air quality. This impact, however, would be short-term in nature. Local air quality impacts associated with construction emissions would remain less than significant for both the Project and the Cornfields Alternative, and air quality impacts would be similar to the Project.

During the operational phase, both the Project and the Cornfields Alternative would result in regional emissions that exceed SCAQMD significance thresholds for CO, NO_x, PM₁₀, and ROC.

¹⁴⁵ All runoff from the Cornfields site would be channeled to existing storm drains or new extensions to existing storm drains. No runoff from the site would thus adversely impact other properties. Neither the Cornfields site nor adjacent properties are within an area subject to flooding (City of Los Angeles General Plan Framework, 100-Year and 500-Year Flood Plains in the City of Los Angeles Map, March, 1994).

¹⁴⁶ Approximately 30 percent of the Cornfields site currently consists of impervious surfaces (i.e., trackage and asphalt). The remaining 70 percent (approximately 28 acres) consists of pervious vacant areas that would be converted to impervious surfaces under this Alternative.

The mitigation measures identified for the Project would reduce these air quality impacts to the degree technically feasible, but emissions would remain above SCAQMD significance thresholds. Therefore, as with the Project, operation of the Cornfields Alternative would have a significant and unavoidable impact on regional air quality. No significant impacts to local air quality would result from either the Project or the Cornfields Alternative. The Cornfields Alternative would not meet applicable air quality objectives (i.e., focused on intensification of uses downtown and adjacent to mass transit facilities) to the same degree as the Project. Operational air quality impacts would thus be worse under the Cornfields Alternative.

Traffic. This Alternative would generate more vehicle trips than the Project. Although the land use program for this Alternative would be similar to the Project's, there would not be the synergy or the joint trip-making opportunities as with STAPLES Center and the Convention Center. There would also be somewhat less transit use and walk-in trips with this Alternative, as the site is further from downtown, and is more isolated. This Alternative would generate an estimated 4,954 additional vehicle trips in the P.M. peak hour, and approximately 6,525 additional vehicle trips in the Saturday evening peak hour. These trip totals would be 37 and 26 percent higher respectively than the additional trips generated by the Project. Access to the Cornfields site, however, is severely restricted, as the site is only accessible from North Spring Street. No direct freeway access is available. A circuitous route from the North Hill Street off-ramp to Alpine Street, and then to North Spring Street provides access from the northbound Pasadena Freeway. A circuitous route from the Stadium Way off-ramp to Chavez Ravine Place, College Street, North Broadway, Alpine Street and North Spring Street provides access from the southbound Pasadena Freeway. Access from the northbound and southbound Santa Ana Freeway is provided from the North Spring Street off- and on-ramps. Access from the northbound I-101 Freeway is from the North Alameda Street off-ramp to North Spring Street. Arterial street access to the Cornfields site is limited to North Spring Street. In the future, Blue Line rail service (Pasadena Line) will serve the extreme south end of the site via the proposed Chinatown Station. Given the higher trip generation and poorer access system in place to serve the Cornfields Alternative, the traffic impacts would be worse than with the Project.

Parking. Both the Project and the Cornfields Alternative would satisfy the operational parking need through the construction of parking facilities containing at minimum Code-required parking. Neither the Project nor the Cornfields Alternative would result in a parking deficit and thus, would not be expected to result in parking impacts. Parking impacts would be similar to the Project.

Pedestrian Safety. Both the Project and the Cornfields Alternative would generate patrons who would be pedestrians for at least part of their trip. Parking would be provided internal to the Cornfields block. Therefore, most of the pedestrians under this Alternative would not be required to cross arterial streets, as would be required under the Project. Pedestrian safety impacts would thus be better under this Alternative.

Hazardous Materials. A Phase I Environmental Site Assessment of the Cornfields site has not been performed. However, it is expected that, like the Project site, there are listed and/or suspected hazardous material/waste sites within the Cornfields property given its previous use. Any existing investigation/remediation activities now taking place at some of these sites would continue and possibly be accelerated under either the Project or the Cornfields Alternative. Both the Project and the Cornfields Alternative would reduce existing hazards to persons, soil and groundwater by necessitating the identification and remediation of hazardous materials/waste sites. Potential exposure to existing hazards would be similar with the Project.

Grading and construction activities under either the Project or the Cornfields Alternative could potentially pose a health hazard through the release of hazardous materials (i.e., contaminated soil, and asbestos containing materials in the case of the Project), a significant but mitigable impact. Construction-related hazards would be similar with the Project.

As with the Project, the Cornfields Alternative would utilize small quantities of hazardous materials (cleaning fluids, oils, paints, etc.) during operations. The use of hazardous materials during operations would represent a significant but mitigable impact under either the Project or the Cornfields Alternative. The potential for exposure to hazardous materials during operations would be similar with the Project.

Noise. There are numerous noise sensitive uses adjacent to the Cornfields site,¹⁴⁷ as well as several sensitive receptors on or adjacent to the Project site. Given the industrial nature of uses adjacent to the Cornfields site, existing ambient noise levels are expected to be greater at the Cornfields Alternative site. Because of the similarity in project characteristics, both the Cornfields Alternative and the Project are expected to generate significant and unavoidable short-term construction noise, adverse on-site operational noise, and significant traffic-related operational noise impacts. As a greater amount of demolition of existing uses would occur under the Project, the Cornfields Alternative would be anticipated to have better short-term construction noise impacts.

Given the similarity between the Project and the Cornfields Alternative with regard to the physical structure proposed and the traffic generated, the Cornfields Alternative would be anticipated to have worse long-term operational noise impacts because of the greater number of noise sensitive uses affected.

Fire. Both the Cornfields Alternative and the Project would generate: (1) adverse but less than significant demands for LAFD fire protection services; (2) a need for the development of

¹⁴⁷ Noise sensitive uses adjacent to the Cornfields site include the Royal Pagoda Hotel, St. Peters Italian Catholic Church, Casa Italian Social Center, three apartment buildings, single family residences, Elysian Park and the Young-Nak Church of L.A. on North Broadway, and the Downey Recreation Center and Pool on North Springs Street. The Los Angeles River separates the Young-Nak Church of L.A. and the Downey Recreation Center and Pool from the site.

emergency access lanes; (3) construction activities which could cause adverse but less than significant impacts to emergency fire response times; and (4) expansion to the existing water system and site-specific fire suppression improvements may be required. Both sites are located within the City's first-in response requirements (i.e., specified distance to nearest truck and engine company).¹⁴⁸ Traffic conditions, rather than distance, would therefore determine emergency response times during operation of the two scenarios. The Cornfields Alternative would have a lower level of the temporary post-event traffic, which could cause significant impacts to emergency fire response times during the post-event hour than the Project. However, arterial and freeway access are more limited under this Alternative, potentially increasing emergency response times during both pre-event and post-event time frames. Fire protection impacts would be similar under this Alternative.

Police. Both scenarios would generate: (1) an adverse but less than significant demand for additional LAPD police protection services during Project events with implementation by the Applicant of a Security Plan and Emergency Procedures Plan, and inclusion of a police substation on-site; and (2) construction activities which could result in adverse but less than significant impacts to LAPD emergency police response times. The Cornfields Alternative would have a lower level of the temporary post-event traffic that could cause significant impacts to police response times during the post-event hour than the Project. However, arterial and freeway access are more limited under this Alternative, potentially increasing emergency response times during both pre-event and post-event time frames. Police protection impacts would be similar under this Alternative.

Parks and Recreation. As the amount of floor area and type of land use proposed for the Cornfields Alternative would be consistent with the Project, the Cornfields Alternative's generation of population and the associated demand for parks and recreation services would be similar to that associated with the Project. With mitigation, impacts would be less than significant and would be similar to the Project.

Schools. As the amount of floor area and type of land use proposed for the Cornfields Alternative would be consistent with the Project, the Cornfields Alternative's generation of population and the associated generation of students would be similar to that associated with the Project. With mitigation, impacts would be less than significant and would be similar to the Project.

Utilities. As the amount of floor area and type of land use proposed for the Cornfields Alternative would be consistent with the Project, the Cornfields Alternative's generation of population and the associated demand for water and generation of sewage and solid waste would be

¹⁴⁸ For high-density commercial land uses such as an arena, the Los Angeles Fire Code indicates a maximum response distance of 0.75 miles and 1.0 mile to the nearest engine and truck company, respectively. The Cornfields site is located approximately 0.5 miles from the nearest truck and engine company (both at Fire Station No. 4 at Union Station). The Project site is located approximately 0.6 miles from the nearest truck and engine company (both at Fire Station No. 10).

similar to that associated with the Project. With mitigation, impacts would be less than significant and would be similar to the Project.

The Cornfields site is not currently served by the existing water and sewer infrastructure systems, which serve the mixed uses along North Broadway and the industrial uses along North Spring Street adjacent to the site. Water and sewer line extension would be required from the existing systems to serve the Cornfields Alternative. It is also possible that improvements to the existing water and sewer systems would be necessitated by this Alternative. By contrast, the Project would not require the extension of water and sewer lines to the Project site as the site is currently served by fully developed water and sewer systems, and would not require expansion of existing water and sewer line capacity. Infrastructure impacts would thus be worse under the Cornfields Alternative.

Geologic and Seismic Hazards. Neither the Cornfields Alternative nor the Project would expose persons or property to fault rupture, landslide, or slope stability hazards.^{149,150} The Cornfields site is not located within an oil field or identified major oil drilling area, and thus is not subject to related subsidence or methane migration.¹⁵¹ The Cornfields Alternative would expose persons and property to a potentially significant liquefaction hazard.¹⁵² Both the Project and the Cornfields Alternative would expose persons and property to a potentially significant seismic hazard. Adherence to building seismic safety code requirements would minimize this hazard. Impacts from geologic and seismic hazards would be similar to the Project.

Architectural/Historic Resources. The Cornfields site does not contain any existing buildings, which are either listed or may be eligible for listing as a federal, State, or local historic structure. The Cornfields Alternative would, however, convert the historic train yard use of the site, as indicated by the Cultural/Historical Site designation of the site by the City's *Central City North Community Plan* as a Historic-Cultural Monument, to other uses. By comparison, the Project site does not contain any buildings, which are either listed or may be eligible for listing as a federal, State, or local historic structure. The Variety Arts Center located adjacent to the Figueroa Properties North would not be significantly impacted under the Project. Impacts with respect to historic resources would be worse than the Project.

¹⁴⁹ *City of Los Angeles General Plan Framework, Alquist-Priolo Special Study Zones and Fault Rupture Study Areas Map, March 1994.*

¹⁵⁰ *City of Los Angeles General Plan Framework, Landslide Inventory and Hillside Areas Map, June 1994.*

¹⁵¹ *City of Los Angeles General Plan Framework, Oil Field and Oil Drilling Areas Map, May 1994. This map indicates the Cornfields site is located just east of the Los Angeles City Oil Field.*

¹⁵² *City of Los Angeles General Plan Framework, Areas Susceptible to Liquefaction Map, October 1993.*

c. Relationship of Alternative to the Project Objectives

The Cornfields Alternative would not achieve many of the Project's and City's objectives. This Alternative would achieve the Project objectives to create attractive new market-rate and affordable housing near downtown employment centers, and to connect the site to the surrounding community through pedestrian, vehicular, and visual linkages. However, this Alternative would not achieve the Project objectives to create a major regional retail/entertainment center and mixed-use district that will complement STAPLES Center and serve as a catalyst for downtown and the Los Angeles Convention and Exhibition Center; to locate major entertainment facilities in the downtown; to establish a focused spatial relationship between the Project, STAPLES Center, and the Convention Center, which links these uses in a mutually beneficial manner; and to develop a properly sized convention hotel. City objectives to concentrate development next to mass transit facilities, to promote activity in the Convention Center area, help foster a Convention Center District, help foster the Figueroa Street corridor which links the City's financial core to the Convention Center, and promote the redevelopment of the South Park Area, would also not be achieved under this Alternative. The Cornfields Alternative would thus be inferior to the Project with respect to achieving applicable Project objectives.

d. Impact Summary

Impacts would be better under the Cornfields Alternative compared to the Project with regard to shade/shadow, pedestrian safety, and noise (construction). The Alternative would have worse impacts with regard to land use, visual quality, light and glare, drainage, air quality (operational), traffic, noise (operational), utilities (infrastructure), and historic resources. This Alternative would require the extension of new drainage, sewer, and water infrastructure to serve a previously underserved area.

F. ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Section 15126.6(e)(2) of the *CEQA Guidelines* indicates that an analysis of alternatives to a proposed project shall identify an environmentally superior alternative among the alternatives evaluated in an EIR. The Guidelines also state that should it be determined that the No Project Alternative is the environmentally superior alternative; the EIR shall identify another environmentally superior alternative among the remaining alternatives.

A comparative summary of the environmental impacts anticipated under each Alternative with the environmental impacts associated with the proposed Project is provided in Table 61 beginning on page 453. A more detailed description of the potential impacts associated with each Alternative is provided above. Pursuant to Section 15126.6(c) of the *CEQA Guidelines*, the analysis

below addresses the ability of the Alternatives to “avoid or substantially lessen one or more of the significant effects” of the project.

Of the Alternatives analyzed in the Draft EIR, the No Project Alternative (Alternative A) is considered the overall environmentally superior alternative, as it would reduce nearly all of the significant impacts occurring under the Project (i.e., regional construction air emissions, regional operational air emissions, construction noise, and traffic) to less than significant levels. Thus, no significant impacts would occur under this Alternative. However, as indicated in the discussion of the No Project Alternative, this Alternative would not meet any of the programmatic, physical, economic, or operational objectives established for the Project, would not include many of the beneficial effects associated with the proposed Project, nor would it fulfill the objectives of the City of Los Angeles’ existing plans for the Project area.

In accordance with the *CEQA Guidelines* requirement to identify an environmentally superior alternative other than the No Project Alternative, a comparative evaluation of the remaining alternatives indicates that the Reduced Density Alternative (Alternative B) would be environmentally superior. Relative to the proposed Project, this Alternative would result in reduced impacts with respect to regional construction air emissions, regional operational air emissions, and traffic. However, these impacts would remain significant. Construction noise impacts associated with the Alternative would be equivalent to those anticipated under the proposed Project and would also be significant due to the proximity of residential uses to the project site. Therefore, although the Reduced Density Alternative would generally reduce the significant impacts occurring under the Project, it would not reduce such impacts to less than significant levels. Under the Reduced Density Alternative, other environmental impacts would be either generally reduced or substantially equivalent to those associated with the proposed Project and would remain less than significant. Additionally, the Reduced Density Alternative would achieve many, but not all, of the programmatic, physical, economic, and operational objectives established for the proposed Project.