6.0 ALTERNATIVES

As required by Section 15126.6 of the *CEQA Guidelines*, this EIR examines alternatives to the onsite development analyzed in this document. Included in this analysis are four alternatives that involve different configurations, sizes and intensity of development on the site, including the CEQA-required "no project" alternative. This section also identifies the Environmentally Superior Alternative.

The following alternatives are evaluated in this EIR:

- *Alternative 1: No Project*
- *Alternative 2: 650,000 Square Foot Maximum Buildout*
- *Alternative 3: 800,000 Square Foot Maximum Buildout*
- *Alternative 4: Regional Connector Corridor*

Table 6-1 provides a summary comparison of the development characteristics of the alternatives. A more detailed description of the alternatives is included in the impact analysis for each alternative.

6.1 NO PROJECT ALTERNATIVE

6.1.1 Alternative Description

This alternative assumes that the no onsite development is implemented and that the project site remains in its current condition with a 19,500 sf office building and surface parking lot. It should be noted that implementation of the No Project alternative would not preclude future development that is consistent with the site's General Plan land use designations of Regional Commercial and Heavy Manufacturing or the site's zoning designations of Commercial (C2) and Heavy Industrial (M3), nor would it meet project objectives.

6.1.2 Impact Analysis

The No Project alternative would involve no physical change to the project site. The existing structure would remain and no demolition or alteration to the structure would occur. Therefore, this alternative would involve no change in the average daily vehicle trips (ADT) associated with the onsite land use. This alternative would avoid the significant and unavoidable impacts associated with onsite development related to air quality, and transportation and circulation. This alternative would also avoid potentially significant, but mitigable impacts related to aesthetics, cultural and historic resources (potential for as yet undiscovered archaeological and/or paleontological resources), geology, hazards, land use and planning, noise, public services, and utilities.

Table 6-1
Comparison of Project Alternatives' Buildout Characteristics

Characteristic	Onsite Development Analyzed in EIR	Alternatives			
		No Project	650 ksf[d] Maximum Buildout	800 ksf Maximum Buildout	Regional Connector Corridor
Retail	200,000 sf[c]	0	140,000 sf	132,000 sf	200,000 sf
Office	500,000 sf	0	180,000 sf	330,000 sf	500,000 sf
Community Space	25,000 sf	0	12,500 sf	16,500	25,000 sf
Creative Live/Work[a]	75,000 sf (83 residential units plus 18,750 sf of commercial space)	0	67,500 sf (75 residential units plus 16,875 sf of commercial space)	49,500 sf (55 residential units plus 12,375 sf of commercial space)	75,000 sf (83 residential units plus 18,750 sf of commercial space)
Multiple Family Residential[b]	400,000 sf (445 units)	0	250,000 sf (278 units)	264,000 sf (293 units)	400,000 sf (445 units)
Total Square Footage	**1,200,000 sf**	**19,500[e]**	**650,000 sf**	**800,000 sf**	**1,200,000 sf**
Maximum Building Height	16 stories	2 stories	6 stories	11 stories	16 stories
Alteration of Onsite Structure	Demolition	No change	Demolition	Demolition	Demolition

[a]Note: The average size of the proposed creative live/work units is assumed to be 900 sf. It is anticipated that 75% of the floor space of each creative live/work unit would be devoted to living area and 25% would be commercial space.
[b] The average size of the proposed residential units is assumed to be 900 sf.
[c] sf: square feet
[d] ksf: 1,000 square feet
[e] Refers to the existing onsite medical office building.

6.2 650,000 SQUARE FOOT MAXIMUM BUILDOUT ALTERNATIVE

6.2.1 Alternative Description

This alternative would involve the construction of a mixed use development with the same components as the anticipated onsite development, but at a smaller scale. As indicated in Table 6-1, onsite structures would be up to six stories in height under this alternative and could accommodate an estimated 140,000 sf of retail space, 180,000 sf of office space, 12,500 sf of community space, 75 live/work units plus 16,875 sf of commercial space, and 250,000 sf of

multiple family residential space in 278 units. Overall, this alternative assumes 650,000 sf of onsite development, or about 54% of what is described in Section 2.0, *Project Description*, and considered in this EIR.

It is assumed that site access and the overall layout of the development under this alternative would be the same as for the anticipated onsite development. As with the anticipated onsite development, parking would be provided onsite, primarily in subterranean levels. However, it is expected that some parking, including loading/unloading spaces, would be provided at-grade. The building footprints would be generally the same as the building footprints for the anticipated onsite development analyzed in this EIR.

6.2.2 Impact Analysis

Aesthetics

The new buildings under this alternative would be larger in height and massing than the existing building onsite. However, this alternative would result in generally lower building heights and smaller massing than anticipated onsite development and would, therefore, be more comparable and compatible with the height and mass of adjacent development. The multi-family residential building directly south of the site is five stories in height; therefore, the six-story maximum building height under this alternative would generally conform to the size and massing of the adjacent residential building, resulting in a less than significant impact. As such, Mitigation Measure AES -2(d) would not apply to this alternative. Similar to anticipated onsite development, impacts related to scenic resources, light and glare, and shadows would be less than significant under this alternative.

Air Quality

The duration of construction activities would be shorter under this alternative as the size of the building area would be 550,000 sf (46%) less than the anticipated onsite development. However, because maximum daily construction emissions would be generally the same under this alternative, temporary air quality impacts during construction would be similar to those resulting from the anticipated onsite development. As such, as with anticipated onsite development, mitigation measures AQ-1(a-l) would be required to reduce potential construction-generated air quality impacts. As with anticipated onsite development, temporary construction impacts would be significant and unavoidable.

Long-term air quality impacts would be incrementally lower as there would be fewer vehicle trips generated under this alternative. This alternative would generate about 353 fewer trips in the AM peak period and 430 fewer trips PM peak period as compared to the anticipated onsite development. The emissions associated with vehicle trips and stationary emissions under this alternative would not exceed SCAQMD thresholds and long-term air quality impacts would be less than significant. Therefore, this alternative would avoid the significant and unavoidable long-term air quality impact that would occur with the anticipated onsite development.

Cultural and Historic Resources

As with the anticipated onsite development, activities associated with construction of this alternative could expose previously unknown, buried archaeological resources, human remains,

or paleontological resources at the site. As with the anticipated onsite development, impacts to unknown, buried archaeological resources, human remains, and paleontological resources would be significant, but mitigable. Implementation of mitigation measures required for the anticipated onsite development, which include mitigation measures CR-2(a-d) and CR-3(a-d), would also be required under this alternative. Therefore, impacts to cultural and historic resources would generally be the same under this alternative as the anticipated onsite development. As with the anticipated onsite development, implementation of mitigation measures CR-2(a-d) and CR-3(a-d) would reduce this alternative's impacts to a less than significant level.

Geology

The new structures under this alternative would be subject to the same potential geological impacts as the anticipated onsite development. Therefore, the potential for adverse effects caused by seismic and soil hazards would generally be the same under this alternative and the anticipated onsite development. Mitigation measures required for the anticipated onsite development, which include mitigation measures GEO-1(a and b) and GEO-3, would apply. As with anticipated onsite development, implementation of such measures would reduce this alternative's impacts to a less than significant level.

Hazardous Materials

Potential hazardous materials associated with the former industrial uses of the site may be present. Therefore, as with the anticipated onsite development, the impacts related to onsite hazardous materials would be significant, but mitigable. Mitigation Measure HAZ-3(b) would be required to reduce impacts related to onsite hazardous materials to a less than significant level. Standard City of Los Angeles mitigation measures included in Section 4.5, *Hazardous Materials*, would also be required for this alternative.

Hydrology and Water Quality

The building footprint under this alternative would generally be the same as that of the anticipated onsite development. Therefore, hydrology and water quality impacts under this alternative would be the same as those of the anticipated onsite development. As with anticipated onsite development, impacts related to the increase in the amount of pollutants on the project site would be potentially significant and implementation of mitigation measures HYD-3(a-t) would be required. With implementation of measures HYD-3(a-t), impacts related to surface water and groundwater quality would be reduced to a less than significant level. Standard City of Los Angeles mitigation measures included in Section 4.6, *Hydrology and Water Quality*, would also be required for this alternative.

Land Use and Planning

The intensity of development would be lower under this alternative than the anticipated onsite development as the total building area would be 46% lower. As with anticipated onsite development, with the necessary approvals and implementation of mitigation measures identified for the anticipated onsite development, this alternative would be consistent with applicable land use and zoning designations. However, this alternative would represent an underutilization of the site given its central location, proximity to jobs and transit accessibility. In accordance with the Transportation Element and the City's Land Use/Transportation Policy,

the site conforms to the "Urban Complex" station area prototype, given its proximity to fixed rail transit. As such, floor area ratios (FARs) of 4.5:1 to 10:1 are appropriate for such as site. As a result, a more intense project would be more consistent with applicable City of Los Angeles General Plan goals and objectives, which encourage development patterns that result in an improved linkage between transportation and land use and direct intense development in areas served by transit. Nonetheless, impacts to land use and planning would be less than significant with mitigation since this alternative would comply with applicable land use and zoning designations.

Noise

Temporary noise and vibration impacts due to construction activities under this alternative would be similar to those resulting from the anticipated development as the construction equipment used onsite would be similar. As with anticipated onsite development, temporary vibration impacts would be less than significant and temporary noise impacts would be significant, but mitigable. As with anticipated onsite development, mitigation measures N-1(a-e) would be required to reduce construction-generated noise to below a level of significance.

Long-term traffic-generated noise impacts under this alternative would be incrementally lower than the anticipated development as there would be 34% fewer vehicle trips generated under this alternative. As with anticipated onsite development, noise generated by traffic would be less than significant under this alternative.

As with the anticipated onsite development, long-term noise impacts related to rooftop ventilation and truck deliveries and trash pick-up would be less than significant after implementation of mitigation measures N-4(a) and N-4(b).

Public Services

The intensity of development would be lower under this alternative than the anticipated onsite development as the total square footage would be lower. As such, the demand for public services would be lower under this alternative due to the lower number of residences and reduced office and retail. Nonetheless, as with anticipated onsite development, impacts related to fire flow would be potentially significant and mitigation measures PS-1(a-c) would be required to reduce impacts to a less than significant level. Standard City of Los Angeles mitigation measures included in Section 4.9, *Public Services*, would also be required for this alternative.

Recreation and Parks

The intensity of development would be lower under this alternative than the anticipated onsite development as the total square footage would be 46% lower. As such, the demand for recreational facilities and parks would be lower under this alternative due to the fewer number of residences and reduced office and retail space. As with the anticipated onsite development, impacts related to recreational facilities and parks would be less than significant without mitigation.

Transportation and Circulation

This alternative includes the same basic components of the anticipated onsite development, but at a smaller size and scale. The traffic study determined that this alternative would generate 353 fewer trips in the AM peak period and 430 fewer trips in the PM peak period as compared to anticipated onsite development. Based on LADOT's criteria for significant impacts, this alternative is expected to create significant traffic impacts at the following six study intersections:

- *Los Angeles Street and Temple Street*
- *Alameda Street and Temple Street*
- *Alameda Street and 1st Street*
- *Vignes Street and 1st Street*
- *Mission Road and 1st Street*
- *Hewitt Street and 1st Street*

The number of significant impacts is reduced by three intersections as compared to anticipated onsite development. Under this alternative, mitigation measures included in Section 4.11, *Transportation and Circulation*, which include TDM strategies and traffic signal upgrades, would be applied to the intersections where potentially significant impacts would occur. Implementation of such mitigation measures would potentially further reduce the number of intersections where potentially significant impacts would occur as compared to the anticipated onsite development. Nevertheless, it is anticipated that impacts would remain unavoidably significant at four of the six significantly affected intersections (Alameda Street/Temple Street, Vignes Street/1st Street, Mission Road/1st Street, and Hewitt Street/1st Street).

Utilities

The intensity of development would be 46% lower under this alternative than anticipated onsite development as the total square footage would be lower. As such, the demand for water, the generation of wastewater and the generation of solid waste would be commensurately lower under this alternative.

As discussed in section 4.12, *Utilities*, the anticipated onsite development would result in a net increase in water demand of 273 acre-feet per year (AFY), a net increase in wastewater of 239,607 gallons per day (GPD), and a net increase in solid waste of 5.46 tons per day. Therefore, based on the 46% reduction in onsite development under this alternative, this alternative would generate an net increase in water demand of approximately 147 AFY, a net increase in wastewater of about 130,000 gallons per day (GPD), and a net increase in solid waste of about 3 tons per day.

As with the anticipated onsite development, impacts related to utilities would be less than significant under this alternative. Standard City of Los Angeles mitigation measures included in Section 4.12, *Utilities*, would also be required for this alternative.

6.3 800,000 SQUARE FOOT MAXIMUM BUILDOUT ALTERNATIVE

6.3.1 Alternative Description

This alternative would involve the construction of a mixed use development, with the same components as the anticipated onsite development, but at a smaller scale. As indicated in Table 6-1, under this alternative, the structures would be up to 11 stories in height and could accommodate approximately 132,000 sf of retail space, 330,000 sf of office space, 16,500 sf of community space, 55 live/work units plus 12,375 sf of commercial space, and 265,000 sf of multiple family residential space in 293 units. Overall, this alternative assumes 800,000 sf of onsite development, or about 66% of what is described in Section 2.0, *Project Description*, and considered in this EIR.

It is assumed that site access and the overall layout of the development under this alternative would be generally the same as for the anticipated onsite development. As with the anticipated onsite development, parking would be provided onsite, primarily in subterranean levels. However, it is expected that some parking, including loading/unloading spaces, would be provided at-grade. The building footprints would be generally the same as the building footprints under the anticipated onsite development analyzed in this EIR.

6.3.2 Impact Analysis

Aesthetics

The new buildings under this alternative would be larger in height and massing than the existing building onsite. However, this alternative would result in lower building heights and 33% less massing than anticipated onsite development and would, therefore, be incrementally more comparable and compatible with the height and mass of adjacent development. The multi-family residential building directly south of the site is five stories in height; therefore, the 11-story maximum building height under this alternative would be more similar to the size and massing of the adjacent residential building than the 16-story maximum building height of anticipated onsite development. Nonetheless, an 11-story building could be considered out of scale with the existing surrounding development. As such Mitigation Measure AES -2(d) would apply to this alternative. Similar to anticipated onsite development, impacts related to scenic resources, light and glare, and shadows would be less than significant under this alternative. Standard City of Los Angeles mitigation measures included in Section 4.1, *Aesthetics*, would also be required for this alternative.

Air Quality

The duration of construction activities would be shorter under this alternative as the size of the building area would be 400,000 sf (33%) less than the anticipated onsite development. However, because maximum daily construction emissions would be generally the same under this alternative, temporary air quality impacts during construction would be similar to those resulting from the anticipated onsite development. As such, as with anticipated onsite development, mitigation measures AQ-1(a-l) would be required to reduce potential construction-generated air quality impacts. As with anticipated onsite development, temporary construction impacts would be significant and unavoidable.

Long-term air quality impacts would be incrementally lower as there would be fewer vehicle trips generated under this alternative. This alternative would generate about 221 fewer trips in the AM peak period and 322 fewer trips PM peak period as compared to the anticipated onsite development. The emissions associated with vehicle trips and stationary emissions under this alternative would not exceed SCAQMD thresholds for NOx and CO. Anticipated onsite development would result in an exceedance of NOx and CO thresholds. However, like the anticipated onsite development, ROG emissions would exceed SCAQMD thresholds. Therefore, as with anticipated onsite development, mitigation measures AQ-2(a) and AQ-2(b) would be required. With implementation of these measures, ROG emissions would be below SCAQMD thresholds and impacts would be less than significant. Therefore, this alternative would avoid the significant and unavoidable long-term air quality impact that would occur with the anticipated onsite development.

Cultural and Historic Resources

As with the anticipated onsite development, activities associated with construction of this alternative could expose previously unknown, buried archaeological resources, human remains, or paleontological resources at the site. As with the anticipated onsite development, impacts to unknown, buried archaeological resources, human remains, and paleontological resources would be significant, but mitigable. Implementation of mitigation measures required for anticipated onsite development, which include mitigation measures CR-2(a-d) and CR-3(a-d), would also be required under this alternative. Therefore, impacts to cultural and historic resources would generally be the same under this alternative as the anticipated onsite development. As with anticipated onsite development, implementation of mitigation measures CR-2(a-d) and CR-3(a-d) would reduce this alternative's impacts to a less than significant level.

Geology

The new structures under this alternative would be subject to the same potential geological impacts as the anticipated onsite development. Therefore, the potential for adverse effects caused by seismic and soil hazards would generally be the same under this alternative and the anticipated onsite development. Mitigation measures required for anticipated onsite development, which include mitigation measures GEO-1(a and b) and GEO-3, would apply to this alternative. As with anticipated onsite development, implementation of such measures would reduce this alternative's impacts to a less than significant level.

Hazardous Materials

Potential hazardous materials associated with the former industrial uses of the site may be present. Therefore, as with anticipated onsite development, impacts related to onsite hazardous materials would be significant but mitigable. Mitigation Measure HAZ-3(b) would be required to reduce impacts related to onsite hazardous materials to a less than significant level. Standard City of Los Angeles mitigation measures included in Section 4.5, *Hazardous Materials*, would also be required for this alternative.

Hydrology and Water Quality

The building footprint under this alternative would generally be the same as that of anticipated onsite development. Therefore, hydrology and water quality impacts under this alternative would be the same. As with the anticipated onsite development, impacts related to the increase

in the amount of pollutants on the project site would be potentially significant and implementation of mitigation measures HYD-3(a-t) would be required. With implementation of HYD-3(a-t), impacts related to surface water and groundwater quality would be reduced to below a level of significance. Standard City of Los Angeles mitigation measures included in Section 4.6, *Hydrology and Water Quality*, would also be required for this alternative.

Land Use and Planning

The intensity of development would be lower under this alternative than the development intensity of anticipated onsite development as the total building area would be 33% lower. As with anticipated onsite development, with the necessary approvals and implementation of mitigation measures identified for the anticipated onsite development, this alternative would be consistent with applicable land use and zoning designations. However, this alternative would represent an underutilization of the site given its central location, proximity to jobs and transit accessibility. In accordance with the Transportation Element and the City's Land Use/Transportation Policy, the site conforms to the "Urban Complex" station area prototype, given its proximity to fixed rail transit. As such, floor area ratios (FARs) of 4.5:1 to 10:1 are appropriate for such as site. As a result, a more intense project would be more consistent with applicable City of Los Angeles General Plan goals and objectives, which encourage development patterns that result in an improved linkage between transportation and land use and direct intense development in areas served by transit. Nonetheless, impacts to land use and planning would be less than significant with mitigation since this alternative would comply with applicable land use and zoning designations.

Noise

Temporary noise and vibration impacts due to construction activities under this alternative would be similar to those resulting from anticipated development as the construction equipment used onsite would be similar. As with anticipated onsite development, temporary vibration impacts would be less than significant and temporary noise impacts would be potentially significant. Mitigation measures N-1(a-e) would be required and would reduce construction-generated noise to a less than significant level.

Long-term traffic-generated noise impacts under this alternative would be incrementally lower than anticipated development as there would be 27% fewer vehicle trips generated under this alternative. As with anticipated onsite development, noise generated by traffic would be less than significant under this alternative.

As with anticipated onsite development, long-term noise impacts related to rooftop ventilation and truck deliveries and trash pick-up would be less than significant after implementation of mitigation measures N-4(a) and N-4(b).

Public Services

The intensity of development would be lower under this alternative than anticipated onsite development as the total building area would be 33% lower. As such, the demand for public services would be lower under this alternative due to the fewer number of residences and reduced office and retail. Nonetheless, as with anticipated onsite development, impacts related to fire flow would be potentially significant and mitigation measures PS-1(a-c) would be

required to reduce impacts to a less than significant level. Standard City of Los Angeles mitigation measures included in Section 4.9, *Public Services*, would also be required for this alternative.

Recreation and Parks

The intensity of development would be lower under this alternative than the anticipated onsite development as the total building area would be 33% lower. As such, the demand for recreational facilities and parks would be lower under this alternative due to the lower number of residences and reduced office and retail space. As with the anticipated onsite development, impacts related to recreational facilities and parks would be less than significant without mitigation. Standard City of Los Angeles mitigation measures included in Section 4.10, *Recreation and Parks*, would also be required for this alternative.

Transportation and Circulation

This alternative includes the same basic components of the anticipated onsite development, but at a smaller size and scale. The traffic study determined that this alternative would generate 221 fewer trips in the AM peak period and 322 fewer trips in the PM peak period as compared to the anticipated onsite development. Based on LADOT's criteria for significant impacts, this alternative is expected to create significant traffic impacts at the following seven study intersections:

- *Los Angeles Street and Temple Street*
- *Alameda Street and 1st Street*
- *Alameda and 1st Street*
- *Vignes Street and 1st Street*
- *Mission Road and 1st Street*
- *U.S. 101 on/off-ramps and 1st Street*
- *Hewitt Street and 1st Street*

The number of significant impacts is reduced by two intersections as compared to the anticipated onsite development. Under this alternative, mitigation measures included in Section 4.11, *Transportation and Circulation*, which include TDM strategies and traffic signal upgrades, would be applied to the intersections where potentially significant impacts would occur. Implementation of these mitigation measures would reduce impacts to the degree feasible; nevertheless, it is anticipated that the same five intersections that would experience unavoidably significant impacts with anticipated onsite development would also have unavoidably significant impacts under this alternative.

Utilities

The intensity of development would be 33% lower under this alternative than anticipated onsite development as the total square footage would be lower. As such, the demand for water, the generation of wastewater and the generation of solid waste would be commensurately lower under this alternative.

As discussed in section 4.12, *Utilities*, the anticipated onsite development would result in an estimated net increase in water demand of 273 acre-feet per year (AFY), a net increase in

wastewater of 239,607 gallons per day (GPD), and a net increase in solid waste of 5.46 tons per day. Therefore, based on the 33% reduction in onsite development under this alternative, this alternative would generate an net increase in water demand of approximately 183 AFY, a net increase in wastewater of about 160,500 gallons per day (GPD), and a net increase in solid waste of about 3.5 tons per day.

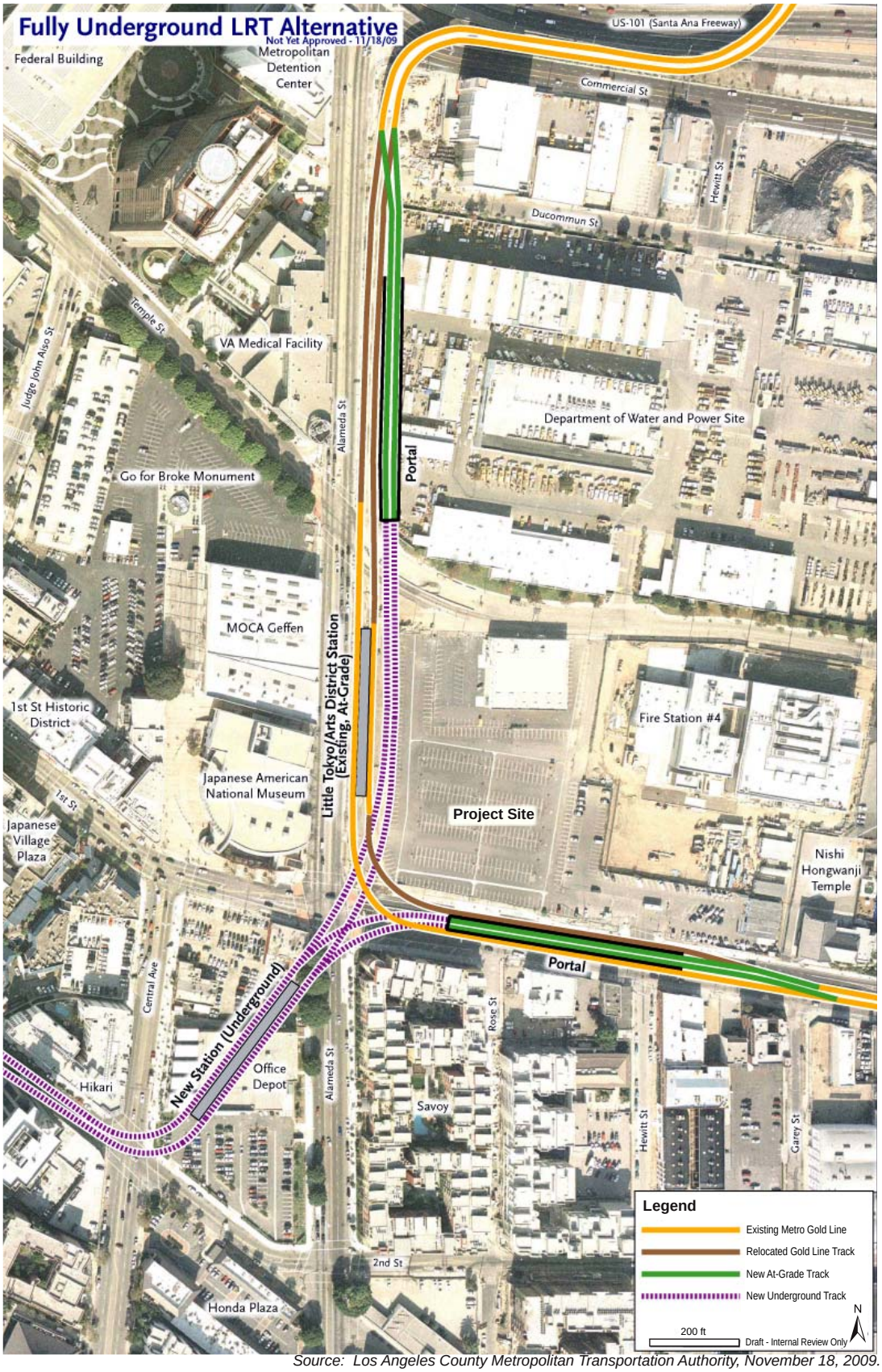
As with the anticipated onsite development, impacts related to utilities would be less than significant under this alternative. Standard City of Los Angeles mitigation measures included in Section 4.12, *Utilities*, would also be required for this alternative.

6.4 REGIONAL CONNECTOR ALTERNATIVE

6.4.1 Alternative Description

The Metro Regional Connector Transit Corridor project, if built, would create an almost two-mile transit link between the Metro Gold and Metro Blue Line light rail transit (LRT) systems through downtown Los Angeles. The Los Angeles County Metropolitan Transportation Authority (Metro) is currently preparing a Draft Environmental Impact Statement/Environmental Impact Report (Draft EIS/EIR) to evaluate a number of alternatives that include both below grade and at-grade alignments. This environmental review, which follows the Alternatives Analysis phase (AA), was authorized by the Metro Board of Directors at its January 2009 meeting. One of the conceptual alignments being considered would include the development of the Regional Connector Corridor on a portion of the project site. According to Metro's preliminary concepts for this alternative, the Regional Connector would be located along the western and southern portions of the site (see Figure 6-1). As such, under this potential alternative, no component of the project could be constructed below grade from the western site boundary line for a distance of 35 feet to the east. Additionally the southern site boundary would be shifted by as much as 70 feet north. Therefore, the overall area of the site would be reduced to approximately 4.5 acres.

As indicated in Table 6-1, this alternative would involve the construction of the same mixed use development, with the same components as the anticipated onsite development analyzed in the EIR at the same scale. The primary difference between this alternative and the anticipated onsite development would be the incrementally higher development intensity of the site under this alternative due to the reduced size of the site. As such, the FAR would be about 6:1 as compared to the approximately 5:1 FAR of the anticipated onsite development. In addition, under this alternative, it is expected that Regional Connector would limit north-south through traffic at the intersection of 1st Street and Hewitt Street, affecting traffic circulation on the planned new Hewitt Street extension north of 1st Street. Although the development on the site would be more compact under this alternative, it is assumed that the overall layout and building footprints under this alternative would be generally the same as for the anticipated onsite development. As with the anticipated onsite development, parking would be provided onsite, primarily in subterranean levels. However, it is expected that some parking, including loading/unloading spaces, would be provided at-grade.



Source: Los Angeles County Metropolitan Transportation Authority, November 18, 2009.

Regional Connector Corridor Conceptual Plan

Figure 6-1

6.4.2 Impact Analysis

Aesthetics

The new buildings under this alternative would be larger in height and massing than the existing building onsite. This alternative would result in the same building heights and massing as the anticipated onsite development. However, the development of the Regional Connector on the southern portion of the site would cause onsite buildings to be set back at least 75 feet farther north than anticipated onsite development. Therefore, Mitigation Measure AES -2(d), which restricts building height in the southern half of the site, would not be required under this alternative as the distance between any building on the north side of 1st Street and the south side of 1st Street would be about 170 feet. As with anticipated onsite development, impacts related to scenic resources, light and glare, and shadows would be less than significant under this alternative. Standard City of Los Angeles mitigation measures included in Section 4.1, *Aesthetics*, would also be required for this alternative.

Air Quality

The duration of construction activities would be generally the same under this alternative as the size of the buildings would be the same as anticipated onsite development. Maximum daily construction emissions would be generally the same under this alternative and temporary air quality impacts during construction would be similar to those resulting from the anticipated onsite development. Long-term air quality impacts would be generally the same as there would be generally the same number of vehicle trips generated under this alternative. (The Regional Connector would be expected to incrementally reduce vehicle trips to and from the site as it would increase transit service in the region; however, the actual reduction in trips is unknown.) Therefore, as with anticipated onsite development, temporary and long-term air quality impacts would be significant. As such, mitigation measures AQ-1(a-l) andAQ-2(a and b) would be required to reduce potential air quality impacts; however, as with anticipated onsite development, emissions would continue to exceed SCAQMD construction and operational air quality thresholds after mitigation. Therefore, impacts would be unavoidably significant.

Cultural and Historic Resources

As with anticipated onsite development, activities associated with the construction of this alternative could expose previously unknown, buried archaeological resources, human remains, or paleontological resources at the site. As with anticipated onsite development, impacts to unknown, buried archaeological resources, human remains, and paleontological resources would be significant, but mitigable. Implementation of mitigation measures required for the anticipated onsite development, which include mitigation measures CR-2(a-d) and CR-3(a-d), would also be required under this alternative. As with the anticipated onsite development, implementation of mitigation measures CR-2(a-d) and CR-3(a-d) would reduce this alternative's impacts to a less than significant level.

Geology

The new structures under this alternative would be subject to the same potential geological impacts as the anticipated onsite development. Therefore, the potential for adverse effects caused by seismic and soil hazards would generally be the same under this alternative and anticipated onsite development. Mitigation measures required for anticipated onsite

development, which include mitigation measures GEO-1(a and b) and GEO-3, would apply to this alternative. As with the anticipated onsite development, implementation of such measures would reduce this alternative's impacts to a less than significant level.

Hazardous Materials

Potential hazardous materials associated with the former industrial uses of the site may be present. Therefore, as with anticipated onsite development, impacts related to onsite hazardous materials would be significant, but mitigable. Mitigation Measure HAZ-3(b) would be required to reduce impacts related to onsite hazardous materials to a less than significant level. Standard City of Los Angeles mitigation measures included in Section 4.5, *Hazardous Materials*, would also be required for this alternative.

Hydrology and Water Quality

The building footprint under this alternative could be incrementally larger than that of the anticipated onsite development due to the smaller size of the project site. Therefore, hydrology and water quality impacts under this alternative could be incrementally greater than those of the anticipated onsite development. As with the anticipated onsite development, impacts related to the increase in the amount of pollutants on the project site would be potentially significant and implementation of mitigation measures HYD-3(a-t) would be required. With implementation of HYD-3(a-t), impacts related to surface water and groundwater quality would be reduced to below a level of significance. Standard City of Los Angeles mitigation measures included in Section 4.6, *Hydrology and Water Quality*, would also be required for this alternative.

Land Use and Planning

The intensity of development would be higher under this alternative than the development intensity of anticipated onsite development as the total building area would be the same but the site would be incrementally smaller. As such, the FAR would be about 6:1 as compared to the approximately 5:1 FAR of the anticipated onsite development. Like the anticipated onsite development, with the necessary approvals and implementation of mitigation measures identified for the anticipated onsite development, this alternative would be consistent with applicable City of Los Angeles General Plan's goals and objectives and the zoning designation, as well as all other applicable land use plans, policies, and regulations. This level of development is appropriate for the Project site given its central location, proximity to jobs and transit accessibility. In accordance with the General Plan Framework, the Transportation Element of the General Plan and the City's adopted Land Use/Transportation Policy, the site conforms to the "Urban Complex" station area prototype, given its proximity to fixed rail transit, and, as such, floor area ratios (FARs) of 4.5:1 to 10:1 are appropriate for such as site. As a result, this more intense project would be consistent with applicable City of Los Angeles General Plan's goals and objectives which encourage development patterns that result in an improved linkage between transportation and land use and direct intense development in those areas served by transit. Therefore, impacts related to land use and planning under this alternative would generally be the same as those of anticipated development. As with anticipated development, impacts to land use and planning would be less than significant with mitigation.

Noise

Temporary noise and vibration impacts due to construction activities under this alternative would be similar to those resulting from anticipated onsite development as the construction equipment used onsite would be similar. As with anticipated onsite development, temporary vibration impacts would be less than significant and temporary noise impacts would be significant. Mitigation measures N-1(a-e) would be required to reduce construction-generated noise and would reduce impacts to a less than significant level.

Long-term traffic-generated noise impacts under this alternative would be generally the same as those of anticipated development as the vehicle trips generated under this alternative would be about the same as the anticipated development. As with anticipated onsite development, noise generated by traffic would be less than significant under this alternative. Under this alternative, onsite residences may be exposed to greater levels of rail-related noise; however, mitigation measures N-5(a) through N-5(c) would reduce such impacts to a less than significant level.

As with the anticipated onsite development, long-term noise impacts related to rooftop ventilation and truck deliveries and trash pick-up would be less than significant after implementation of mitigation measures N-4(a) and N-4(b). Note that the development of the Regional Connector could shield the existing residences to the south from some noise generated on the project site.

Public Services

The intensity of development would be the same as anticipated onsite development as the total onsite building area would be the same. As such, the demand for public services would be the same under this alternative. As with anticipated onsite development, impacts related to fire flow would be potentially significant and mitigation measures PS-1(a-c) would be required to reduce impacts to a less than significant level. Standard City of Los Angeles mitigation measures included in Section 4.9, *Public Services*, would also be required for this alternative.

Recreation and Parks

Total onsite building area would be the same under this alternative and anticipated onsite development. As such, the demand for recreational facilities and parks would be the same under this alternative. As with anticipated onsite development, impacts related to recreational facilities and parks would be less than significant without mitigation. Standard City of Los Angeles mitigation measures included in Section 4.10, *Recreation and Parks*, would also be required for this alternative.

Transportation and Circulation

This alternative includes the same components of the anticipated onsite development, at the same size and scale. As such, based on the Institute of Transportation Engineers (ITE) trip generation rates the number of trips generated by this alternative would be identical to the number of trips generated by anticipated onsite development. As with the anticipated onsite development, onsite development would create significant traffic impacts at the following nine study intersections based on LADOT's criteria for significant impacts:

- *Alameda Street and Aliso Street*
- *Los Angeles Street and Temple Street*

- *Alameda Street and Temple Street*
- *Grand Avenue and 1st Street*
- *Alameda Street and 1st Street*
- *Vignes Street and 1st Street*
- *Mission Road and 1st Street*
- *US-101 on and off-ramps and 1st Street*
- *Hewitt Street and 1st Street*

As with anticipated onsite development, mitigation measures included in Section 4.11, *Transportation and Circulation*, which include TDM strategies and traffic signal upgrades, would be applied to the intersections where potentially significant impacts would occur. As with anticipated onsite development, implementation of such mitigation measures would reduce potentially significant impacts at four of the nine adversely affected intersections to below a level of significance and impacts at five of the nine intersections would be unavoidably significant.

It should be noted that the purpose of the Regional Connector would be to increase transit service in the region. As such, an incremental reduction in daily trips to and from the site as compared to anticipated onsite development could be expected under this alternative, though this reduction has not been quantified for the purposes of this study.

Utilities

This alternative includes the same components of the anticipated onsite development, at the same size and scale. As such, the demand for water, the generation of wastewater and the generation of solid waste would be the same under this alternative. As with anticipated onsite development, impacts related to utilities would be less than significant under this alternative. Standard City of Los Angeles mitigation measures included in Section 4.12, *Utilities*, would also be required for this alternative.

6.5 ALTERNATIVE SITES

The California Supreme Court, in *Citizens of Goleta Valley v. Board of Supervisors* (1990), indicated that a discussion of alternative sites is needed if the project "may be feasibly accomplished in a successful manner considering the economic, environmental, social, and technological factors involved" at another site. As suggested in *Goleta*, several criteria form the basis of whether alternative sites need to be considered in detail. These criteria take the form of the following questions:

1. *Could the size and other characteristics of another site physically accommodate the project?*
2. *Is another site reasonably available for acquisition?*
3. *Is the timing of carrying out development on an alternative site reasonable for the applicant?*
4. *Is the project economically feasible on another site?*
5. *What are the land use designation(s) of alternative sites?*
6. *Does the lead agency have jurisdiction over alternative sites? and*

7. *Are there any social, technological, or other factors that may make the consideration of alternative sites infeasible?*

Other sites that could physically accommodate anticipated onsite development are present in the City of Los Angeles and some sites have land use designations that would accommodate the anticipated onsite development. However, a fundamental objective of the proposed project is to provide a high quality, economically viable mixed use development on the project site that enhances the Little Tokyo community and takes advantage of the site's access to transit opportunities. Other locations could not achieve this fundamental objective. Therefore, discussion of the impacts of alternative sites is not warranted.

6.6 ALTERNATIVES CONSIDERED, BUT REJECTED

Alternatives considered, but rejected include a range of scenarios that might eliminate the unavoidably significant transportation and circulation impacts associated with anticipated onsite development. However, the level of reduction in project size needed to reduce impacts to below significance thresholds would be so great (roughly 90%) that it would render development of the site infeasible. As such, alternatives that would further restrict onsite development beyond what is considered in this EIR were rejected from consideration.

6.7 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Table 6-2 compares the impacts for each of the alternatives to the impacts of the anticipated onsite development.

The No Project Alternative would be the overall environmentally superior alternative. However, the No Project Alternative would not achieve the basic project objectives as stated in Section 2.0, *Project Description*.

Among the development options, the 650,000 Square Foot Maximum Buildout Alternative would be the environmentally superior alternative, as the traffic generated under this alternative would be lower than that of the other development options and would not cause a significant impact at the intersections of Alameda Street and Aliso Street, Grand Avenue and 1st Street, and U.S. 101 on and off-ramps and 1st Street. In addition, this alternative would avoid the significant and unavoidable long-term air quality impact that would occur as a result of anticipated onsite development. Finally, because this alternative would have a maximum building height of six stories, impacts related to aesthetics would be lower under this alternative than under the other development options. This alternative would achieve the basic project objectives stated in Section 2.0, *Project Description*, which include providing high quality, economically viable mixed use development; enhancing the Little Tokyo community; implementing City planning objectives; and taking advantage of the site's access to transit, particularly the adjacent Little Tokyo/Arts District Metro Gold Line station. However, this alternative involves only about 54% as much building area as anticipated onsite development. As such, although it would not conflict with objectives relating to maximizing development around transit centers, this alternative would not meet objectives related to enhancing transit access to the same degree that anticipated onsite development would. In addition, by reducing development potential on the project site, the 650,000 Square Foot Maximum Buildout

Alternative may increase development pressure on other sites in order to meet demand for housing and jobs fueled by regional population growth. In this way, minimizing development potential on the project site may increase environmental impacts elsewhere in the region.

Table 6-2
Impact Comparison of Alternatives

Issue	Onsite Development Analyzed in the EIR	Alternatives			
		No Project	650 ksf Maximum Buildout	800 ksf Maximum Buildout	Regional Connector Corridor
Aesthetics	=	+	+	+	=/+
Air Quality	=	+	+	+	=
Cultural Resources	=	+	=	=	=
Geology	=	+	=	=	=
Hazardous Materials	=	+	=	=	=
Hydrology and Water Quality	=	+	=	=	=
Land Use and Planning	=	+	=/+	=/+	=
Noise	=	+	=/+	=/+	=
Public Services	=	+	=/+	=/+	=
Recreation	=	+	=/+	=/+	=
Traffic	=	+	+	+	=
Utilities	=	+	=/+	=/+	=

+ Superior to the anticipated development analyzed in the EIR (reduced level of impact)
- Inferior to the anticipated development analyzed in the EIR (increased level of impact)

= /+ slightly superior to the anticipated development analyzed in the EIR in one or more aspects, but not significantly superior
= Similar level of impact to the anticipated development analyzed in the EIR