

### C. REDUCED PROJECT ALTERNATIVE

The Reduced Project Alternative includes demolition of all existing development at the Project Site and Add Area. This development would be replaced by approximately 151,875 square feet of office space, approximately 54 condominium units, and a senior housing facility consisting of approximately 389 independent living units and 35 senior housing units.

The Reduced Project Alternative is based on the need to reduce air quality impacts anticipated from the proposed Project. This Alternative assumes that, as with the proposed Project, both the Project Site and Add Area would be redeveloped. The four development scenarios considered under the proposed Project for both the Project Site and Add Area were examined to determine which *one* scenario would be further analyzed under the Reduced Project Alternative. Selection of a development scenario was based on reducing the proposed Project to a size that would not exceed the SCAQMD thresholds for air quality. This required that the air quality impacts of only one development scenario be reduced below the threshold. Therefore, the development scenario that resulted in the smallest amount of pollutant emissions (i.e. the smallest exceedance of air quality standards) under the proposed Project was chosen. This would result in the smallest percentage decrease in both air quality impacts and square footage of development, and therefore would maintain the largest potential project, or worst case scenario, for development at the Project Site and Add Area under the Reduced Project Alternative. The development scenario chosen for analysis under the Reduced Project Alternative was the Office/Residential scenario.

Under the proposed Project, the Office/Residential scenario includes 1,125,000 square feet of office space, 400 condominium units, and a senior housing facility of approximately 389 independent living units and 35 assisted living units. Based on the air quality analysis prepared for the proposed Project, it was determined that to reduce the air quality impacts of this development scenario below the established thresholds, the number of vehicle trips generated by the Project must be reduced by approximately 67 percent, or approximately one-third of the proposed Project trips. It is assumed under this Alternative that the previously approved Homeplace Retirement facility would be constructed in full, as approved. As a result, to achieve the required trip limitation, the Project would be reduced to approximately 138,375 square feet of office space, 49 condominium units, 389 independent senior living units, and 35 assisted living units, or approximately 12.3 percent of the proposed Project.

The environmental setting for the project area (Project Site and Add Area) is similar to that provided for the proposed Project. Further, all service and utility providers for the Reduced Project Alternative will be similar to those of the proposed Project.

Following is a discussion of environmental impacts anticipated as a result of the Reduced Project Alternative.

## **1. Aesthetics**

Due to the developed, commercial and industrial nature of the project area, redevelopment of the Project Site and Add Area will not alter the existing visual character of the project area. Based on the reduction of square footage associated with the Reduced Project Alternative, to utilize the majority of development area on the Site, the Reduced Project Alternative would result in building heights shorter than those included under the Proposed Project. The Proposed Project was determined to result in a less than significant impact to views. Therefore, the Reduced Project Alternative would result in a less than significant impact to views. The Reduced Project Alternative will therefore result in a less than significant impact to aesthetics.

## **2. Air Quality**

The Reduced Project Alternative would generate approximately 2,452 daily trips, a reduction of approximately 67 percent, compared to the proposed Project.

Due to the direct relationship between air quality and trip generation, a 67 percent reduction in trip generation will result in an approximately 67 percent reduction in impacts to air quality. Based on an air quality analysis conducted for the proposed Project, the construction phase of the Reduced Project Alternative would generate a maximum of approximately 11 pounds of CO, 7 pounds of ROG, 18 pounds of NO<sub>x</sub>, 1 pound of SO<sub>x</sub>, and 35 pounds of PM<sub>10</sub> after mitigation. All of these emissions fall below the identified SCAQMD threshold for the respective pollutant. Therefore, construction of the Reduced Project Alternative would not exceed air quality thresholds established by the SCAQMD and would result in a less than significant impact to air quality during construction.

Assuming a 67 percent reduction in trip generation, the Reduced Project Alternative project would generate approximately 403 pounds of CO, 53 pounds of ROG, 46 pounds of NO<sub>x</sub>, less than 1 pound of SO<sub>x</sub>, and 20 pounds of PM<sub>10</sub> during the operational phase. All of these emissions fall below the identified SCAQMD thresholds for the respective pollutants. Therefore, after mitigation, operation of the Reduced Project Alternative would not exceed air quality thresholds established by the SCAQMD and would result in a less than significant impact to air quality.

## **3. Biological Resources**

Due to the existing urban development on the Project Site and Add Area, the amount of impervious surface on both the Project Site and Add Area, and the length of time that these conditions have existed, there are no known or identified significant biological resources, including endangered or threatened species on the Project Site or Add Area. The City of Los Angeles Citywide General Plan Framework EIR does not identify the Project Site or Add Area as a Biological Resource Area, commonly known for providing habitat for threatened or endangered

species. The Project Site and Add Area are not located within an existing or proposed Significant Ecological Area. Therefore, the Reduced Project Alternative would result in a less than significant impact to biological resources due to conflicts with local environmental plans or the loss or destruction of listed, endangered, threatened, rare, protected, candidate, or sensitive species or their habitats.

The Reduced Project Alternative may relocate or remove a small stand of trees located at the southwestern corner of the Project Site, near the intersection of Nordhoff Street and Corbin Avenue. Trees located along street frontages of the Project Site and Add Area may be altered or removed as a result of the All Residential Alternative. The removal of trees and landscaping may result in a significant impact to biological resources. However, with incorporation of required mitigation to replace any trees removed at a 1:1 ratio, any significant impacts to biological resources would be reduced to a less than significant level. Therefore, as with the proposed Project the Reduced Project Alternative would result in a less than significant impact to biological resources.

#### **4. Geologic Hazards**

Impacts from seismic hazards would be similar to those anticipated from the proposed Project. The northern portion of the Project Site is not located within a designated area of liquefaction hazard; however, the southern portion of the Project Site is located within a designated area of liquefaction hazard. The Add Area is not located within an area of liquefaction. Due to the location of part of the Project Site within a liquefaction zone, a building-specific liquefaction evaluation will be required for the southern portion of the Project Site to evaluate the anticipated magnitude of liquefaction-induced settlement and to provide foundation recommendations to mitigate adverse effects from liquefaction. Therefore, a significant geologic hazard impact is not anticipated due to the location of a portion of the Project Site within a liquefaction zone.

The Project Site and Add Area are not within a currently established Alquist-Priolo Earthquake Fault Zone, therefore, the potential for surface rupture at the project area due to fault plane displacement is considered low. However, the project area could be subjected to strong ground shaking in the event of an earthquake, a hazard common in Southern California. Potential geologic hazards will be similar to those expected as a result of the proposed Project. Any potential effects of ground shaking can be mitigated by proper engineering design and construction in conformance with current building codes and engineering practices. A significant geologic hazard impact is not anticipated as a result of the Reduced Project Alternative due to the location of the project area within an area of potential strong ground shaking.

#### **5. Hazardous Materials and Waste**

According to the Phase I Environmental Assessment prepared by American Environmental Specialist, Inc. (AES), no major environmental concerns requiring immediate investigation or

remediation exist on the Project Site and Add Area. Soil and groundwater contamination were not identified on the Project Site or Add Area during the Phase I investigations performed.

With the proposed development of office and residential land uses at the Project Site and Add Area under the Reduced Project Alternative, the rate of use, transport, and disposal of hazardous waste would likely decrease. However, due to the age and type of buildings existing on the sites, it is likely that asbestos and lead paint may be located within the buildings. The demolition of any structures with asbestos containing materials or lead-based paint would have the potential to release these substances if they are not properly stabilized or removed prior to demolition activity and could result in a significant impact to hazardous materials. Similar to the proposed Project, proper stabilization and removal of such materials must occur prior to demolition of buildings at the Project Site and Add Area. After mitigation, the Reduced Project Alternative would result in a less than significant hazardous materials and hazardous waste impact.

## **6. Hydrology**

Due to the existing, developed nature of the Project Site and Add Area, the Reduced Project Alternative will not substantially alter hydrology at the site. A small stand of trees is currently located at the southwestern corner of the Project Site. However, similar to the proposed Project, removal of this stand of trees would reduce runoff from the site by an unsubstantial 1 cfs of water, or 0.4 percent of the existing runoff.

Existing storm drains along Shirley Avenue north of Teledyne Way are undersized and do not currently fully convey a 10 year storm event. However, runoff from the Project Site currently travels via sheet flow eastward along Teledyne Way to Shirley Avenue where it is conveyed southward along the Shirley Avenue street section to catch basins located at the intersection of Nordhoff Street and Shirley Avenue. Due to the developed nature of the Project Site, the existing undersized sewer conditions at the Project Site would not be altered by the Reduced Project Alternative and impacts would be similar to those of the proposed Project. However, when development of the Reduced Project Alternative occurs within the Add Area properties, the undersized storm drain conditions along Shirley Avenue would have to be reexamined as they may adversely affect conditions at the Project Site.

The approved Homeplace Retirement Community project includes the installation of a private storm drain to control runoff from the northwest, eight acre portion of the Project Site. Under the Reduced Project Alternative, it is assumed that only a portion of the approved Homeplace development would be constructed so it is unclear what portion, if any, of this storm drain would be constructed. However, with or without this improvement, as with the proposed Project, the Reduced Project Alternative will result in a less than significant impact to hydrology.

## **7. Land Use**

The Project Site and Add Area are currently zoned MR2-1, Industrial, [T][Q]M1-1, and P-1, Parking. With the adoption of a General Plan designation and zoning that are consistent, such as the proposed C2-1 zoning and the Community Commercial designation, the Reduced Project Alternative would result in a less than significant land use impact. This impact would be similar to the proposed Project at the Project Site and development scenarios analyzed for the Add Area.

## **8. Noise**

The Reduced Project Alternative would introduce a smaller number of residential units into the project area and therefore, a smaller number of potential sensitive receptors.

The Project Site and Add Area are located in an urban environment. The existing noise environment is characterized by the mix of land uses within it, which includes commercial, industrial, and residential development as well as arterial roadways. Similar to the proposed Project, vehicular traffic is the primary source of noise in the vicinity and is the largest consistent noise source.

The Reduced Project Alternative will reduce the trips generated at the Project Site and Add Area by approximately 4,903 daily trips. Therefore, impacts to noise under the Reduced Project Alternative will be similar to, or less significant than (as a result of the reduced trip generation) impacts of the proposed Project. Because the proposed Project will result in a less than significant impact to noise, the Reduced Project Alternative will result in a less than significant impact to noise.

## **9. Population and Housing**

The Reduced Project Alternative could result in the introduction of a maximum of 1,130 residents into the project area. As with the proposed Project, the total population and number of housing units as a result of development will not exceed projections made for the project area in the City of Los Angeles Citywide General Plan Framework EIR. Therefore, as with the proposed Project, the Reduced Project Alternative will result in a less than significant impact to population or housing.

## **10. Employment**

Under the Reduced Project Alternative, a maximum of approximately 771 employees will be introduced into the project area, a decrease of approximately 229 employees. As a result of the loss of jobs and employees in the project area, the Reduced Project Alternative would result in a significant impact to employment.

## **11. Fire Protection**

The Project Site is currently served by the following Fire Station Nos 103, 104, and 107. Based on a fire protection service analysis completed for the proposed Project, the Project Site would be adequately served with the incorporation of mitigation measures. The Reduced Project Alternative, which will result in less development on the Project Site and Add Area, will therefore be adequately served by existing fire protection services with the incorporation of necessary mitigation measures. Therefore, the Reduced Project Alternative will result in a less than significant impact to fire protection services.

## **12. Police Protection**

Due to the currently understaffed conditions of the Devonshire Division, as with the proposed Project, the Reduced Project Alternative would result in a significant impact to police protection services in the area.

## **13. Libraries**

Based on the current service capacity of the Porter Ranch Library (approximately 100,000 residents) and the current population served, the additional 1,130 residents generated by the Reduced Project Alternative would not exceed the level of service available at the library branch currently serving the project area. Therefore, as with the proposed Project, the Reduced Project Alternative will result in a less than significant library services impact.

## **14. Schools**

LAUSD schools currently serving the project area include: Calahan Elementary School, Nobel Middle School, and Cleveland High School. Currently, all three of the schools operate on a traditional school calendar. The Reduced Project Alternative would generate school aged children, approximately two elementary school students, one middle school student, and one high school student. Both Calahan Elementary and Nobel Middle Schools have adequate capacity to accommodate the potential student generation from the Reduced Project Alternative. However, the addition of students to Cleveland High School due to area growth and the Reduced Project Alternative would exceed the current operating capacity for the school. Therefore, the Reduced Project Alternative could result in a significant impact to schools. However, as with the proposed Project, this impact would be mitigated by the payment of school fees. As with the proposed Project, the Reduced Project Alternative would result in a less than significant impact to school services.

## **15. Recreation**

As with the proposed Project, there is no open space or parkland located on the Project Site or Add Area. The Reduced Project Alternative does not include the construction or removal of open space or parkland. The Reduced Project Alternative could increase population in the area by approximately 1,130 residents which would result in a decrease in the ratio of acres of parkland to residents from 32.5 acres of parkland per 1,000 residents to 32.1 acres of parkland per 1,000 residents. This ratio is still greater than both the City of Los Angeles requirement of 4 acres of parkland per 1,000 residents and the City of Los Angeles provision of 4.25 acres per 1,000 residents. The Reduced Project Alternative would be required to pay an in-lieu fee in accordance with the City's Ordinance (No. 141,422) and as set forth in the Zoning Code (Section 17.12). Therefore, the Reduced Project Alternative will result in a less than significant impact on parkland and open space. With the incorporation of mitigation measures, the Reduced Project Alternative would result in a less than significant impact on parkland and open space.

## **16. Traffic**

Based on a trip generation analysis conducted for the proposed Project at the Project Site, a sixty seven percent reduction in trips under the Reduced Project Alternative would generate approximately 2,452 daily trips, a net reduction of 4,976 trips at the Project Site and Add Area. Therefore, the Reduced Project Alternative would result in a less than significant impact to traffic.

However, under the Reduced Project Alternative, the applicant would not have be required to provide a fair-share contribution to the Mason Avenue At-Grade Crossing project. Therefore, it is unclear when, or whether, the Mason Avenue At-Grade Crossing project would move forward.

## **17. Electricity**

Existing development at the Project Site and Add Area consumes approximately 6,393,428 Kwh annually. The Reduced Project Alternative could consume approximately 4,453,291 Kwh annually which would be a reduction of approximately 1,940,137 Kwh annually at the Project Site. Based on an electricity demand analysis conducted for the proposed Project, the LADWP has determined that electricity could be provided for the Reduced Project Alternative without affecting the electricity distribution system. The LADWP does not expect disruption of service to existing customers as a result of the Reduced Project Alternative. The Reduced Project Alternative will result in a less than significant impact to electricity provision.

## 18. Natural Gas

Existing development at the Project Site and Add Area consumes approximately 1,392,719 cubic feet of natural gas monthly. The Reduced Project Alternative could consume approximately 2,174,190 cubic feet of natural gas monthly. This would be an increase of approximately 781,471 cubic feet monthly.

Based on a natural gas demand analysis conducted by The Gas Company for the proposed Project, the Gas Company will be able to accommodate the additional natural gas demand resulting from the Reduced Project Alternative. The Gas Company has indicated that adequate supply for estimated demand in the foreseeable future is available and future service problems are not anticipated.<sup>133</sup> Therefore, the Reduced Project Alternative will result in a less than significant impact to natural gas provision.

## 19. Water

Development on the Project Site and Add Area currently consumes approximately 89,263 gallons per day of water, or 100 acre-feet annually. The Reduced Project Alternative could demand approximately 82,053 gallons per day of water, or 91.9 acre-feet annually, a reduction of approximately 7,210 gallons per day or 8.1 acre-feet annually compared to the proposed Project. The proposed Project was determined to result in a less than significant impact to the water supply. Therefore, the Reduced Project Alternative would result in a less than significant water supply impact.

## 20. Sewers

Development at the Project Site and Add Area currently generates approximately 84,547 gallons per day of sewage. Development of the Reduced Project Alternative could generate approximately 96,350 gallons per day of sewage, an increase of approximately 11,803 gallons per day. According to the Los Angeles Citywide General Plan Framework EIR, the Tillman WRP currently operates at a surplus and an increase of approximately 11,803 gallons per day will not exceed the capacity of the Tillman WRP. Therefore, as with the proposed Project, the Reduced Project Alternative will result in a less than significant impact to sewage treatment in the project area.

According to a sewer capacity analysis conducted by the City of Los Angeles - Bureau of Engineering for the proposed Project, it is likely that sewers currently located in Corbin Avenue and Nordhoff Street would have adequate capacity to facilitate construction of the proposed Project at the Project Site. However, if development upstream of or within the add area does

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<sup>133</sup>Letter from Jim Hammel, Technical Services, Northern Region of The Gas Company to Carrie Riordan of Planning Associates, Inc. May 9, 2002.

occur, local sewers in Melvin Avenue, Prairie Street, and Shirley Avenue must be studied independently for capacity sufficiency. Therefore, the Reduced Project Alternative is not anticipated to result in a significant impact to sewers in the project area.

As with the proposed Project, the following mitigation measure should be considered for inclusion into the Reduced Project Alternative: Although a significant impact is not expected on local sewer lines as a result of the proposed project, in the instance that growth and development occurs within the add area, a study of the capacity of local sewers must be completed prior to the issuance of a new building permit.

## **21. Solid Waste**

Demolition of existing development will generate approximately 37,778 tons of debris, similar to the proposed Project. A portion of the materials could be recycled. The remainder of the demolition debris will be disposed of at a landfill. Construction of the Reduced Project Alternative will generate approximately 272 tons of debris. Based on the materials utilized during construction, it is assumed that a portion of the debris could be recycled. The remainder of the construction debris will be disposed of within a landfill. Any waste generation resulting from the construction phase of the Reduced Project Alternative would be temporary in nature and would not result in long-term disposal of waste into any one landfill. Based on the temporary nature of the construction phase and the limited amount of debris generated, the Reduced Project Alternative would result in a less than significant impact to solid waste during the construction phase.

The project site and add area currently generates approximately 11,288 pounds per day, or approximately 1,761 tons per year. Operation of the Reduced Project Alternative will generate approximately 2,932 pounds per day, or approximately 457 tons per year, a decrease of approximately 8,356 pounds per day, or approximately 1,304 tons per year. Therefore, the Reduced Project Alternative will result in a less than significant impact to solid waste during the operational phase.