

VI. PROJECT ALTERNATIVES

1. INTRODUCTION

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 the California Environmental Quality Act (CEQA). This includes a comparative analysis of the alternatives to the proposed project pursuant to Section 15126(d) of the *CEQA Guidelines*, as amended. According to the *CEQA Guidelines*, the discussion of alternatives should focus on alternatives to a project that can avoid or substantially lessen the significant effects of the project, while meeting the basic objectives of the project. The *CEQA Guidelines* indicate that the range of alternatives included in this discussion should be sufficient to allow decision makers a reasoned choice between the alternatives and a proposed project. The alternatives discussion should provide decision makers with an understanding of the environmental merits and disadvantages of various project alternatives.

2. SELECTION OF ALTERNATIVES

As stated above, the principal purpose of alternatives is to define specific strategies that would reduce the magnitude of, or eliminate, potential project-related environmental impacts. The project, as proposed, would result in significant unavoidable adverse impacts associated with the following, even after implementation of mitigation measures designed to reduce the severity of project impacts:

- Construction of the proposed structure on the Hill Street site would be of a size, scale, proportion and mass that would have the potential to visually compete with and overwhelm the rehabilitated historic Broadway building and result in an indirect impact as a result of impairing the building's immediate surroundings;
- Construction of the Hill Street building adjacent to the historic Broadway building would result in a visual incompatibility due to a contrast in mass and height between the two buildings;
- During project construction and operation, both reactive organic compounds (ROC) and oxides of nitrogen (NO_x) emissions would exceed established thresholds of significance; and
- Operation of the proposed Hill Street building would result in interior noise levels in the residential units at the Hill Street building above 45 decibels measured on an A-weighted scale (dB(A)) due to operations at the loading docks.

First, an EIR should examine alternatives that meet basic objectives of the project, which include the following for the Herald Examiner project:

- To rehabilitate the 1913 Herald Examiner building, a City of Los Angeles Historic-Cultural Monument, which ceased newspaper operation in 1989;
- To provide much needed housing, including innovative urban dwellings for the City of Los Angeles;

- To provide high quality housing in an underutilized urban area of the City of Los Angeles;
- To provide conveniently located housing for downtown professionals who commute from neighboring communities and counties;
- To provide retail shopping and dining opportunities for the local community;
- To provide renovated office facilities for the community in the historic Herald Examiner building;
- To develop the site with a land use consistent with the intent of the Central Business District Redevelopment Plan and the City Center Redevelopment Plan;
- To improve and integrate the streetscape along Broadway, South Hill Street, 11th Street and 12th Street;
- To encourage privately financed redevelopment and investment in a redevelopment area without reliance on public subsidy;
- To enhance the property tax base for the Central Business District Redevelopment Project Area and the City Center Redevelopment Project Area;
- To provide jobs within the Central Business District Redevelopment Project Area and the City Center Redevelopment Project Area;
- To abate hazardous materials in the interest of public safety;
- To provide dedicated off-street parking for the historic Broadway building; and
- To create innovative architectural design statements that will create recognizable high-quality world-class buildings for Downtown Los Angeles.

Second, the *CEQA Guidelines* stipulate that alternatives addressed in an EIR should be feasible and should not be considered remote or speculative. The *CEQA Guidelines* Section 15126.6(f)(1) state that "...among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, jurisdictional boundaries and whether the applicant can reasonably acquire, control or otherwise have access to the alternative site."

In response to the criteria outlining requirements for an alternatives analysis, six alternatives have been selected and evaluated for the proposed project. For purposes of visually comparing the massing and scale of each alternative, **Figure VI-1, Broadway and Hill Street Buildings Proposed Scheme** and **Figure VI-2, 12th Street Site Proposed Scheme**, have been included. The following provides a summary of each alternative.

Figure VI-1, Broadway and Hill Street Buildings Proposed Scheme

Figure VI-2, 12th Street Site Proposed Scheme

The alternatives analyzed in the Draft EIR are as follows:

- Alternative 1 – No Project Alternative
- Alternative 2 – Reduced Density/Adaptive Reuse: Adaptive Reuse of the Press Building Alternative
- Alternative 3 – Reduced Density: Replace the Press Building with a Building of Similar Scale to the Broadway Building Alternative
- Alternative 4 – Reduced Density: 6:1 floor area ratio (FAR) Per Site Alternative
- Alternative 5 – Revised Land Use: Residential in Broadway Building Alternative
- Alternative 6 – Affordable Housing: 20–35 Percent Density Bonus Alternative

3. ALTERNATIVES CONSIDERED BUT REJECTED

In defining project alternatives that would be analyzed in the EIR, several alternatives were considered; however, some of those considered were rejected. *CEQA Guidelines* Section 15126.6(c) states: “The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency’s determination.” As stated previously, the *CEQA Guidelines* stipulate that alternatives addressed in an EIR should be feasible and should not be considered remote or speculative.

The agency initially considered, but ultimately rejected, during its determination of alternatives for the proposed Herald Examiner project the following three project alternatives:

- Commercial and Retail Alternative: Under this project alternative, one of the two new buildings proposed on either the Hill Street site or the 12th Street site would consist entirely of commercial and/or retail uses. The other building would remain a mixed-use building with retail, office and residential uses, as under the proposed project.
- Broadway Building Replacement Alternative: Under this project alternative, existing structures and uses on all three of the project sites, including the Broadway site, would be demolished and replaced with high-density mixed-use buildings.
- Alternative Site: Under this project alternative, the project as proposed would be constructed on up to three alternate project sites in the South Park area of Downtown Los Angeles.

The Commercial Retail Alternative was considered. However, this alternative was rejected because of its failure to meet most of the basic project objectives, primarily associated with providing much-needed housing in the growing South Park area of Downtown Los Angeles. This alternative would not further the housing goals and objectives included within the Central City Community Plan, Central Business District Redevelopment Plan, or the City Center Redevelopment Plan, nor would this alternative avoid or substantially lessen any of the significant impacts of the project. This alternative would still result in the

construction of a new building on the Hill Street site, adjacent to the historic and rehabilitated Broadway building, that would be incompatible in size, scale, proportion and mass. As such, the cultural resources and visual resources impacts of this alternative would be comparable to those of the proposed project.

This alternative would also result in air quality and noise impacts comparable to those from the proposed project. Similar construction activities and operational vehicle trips would occur under this project alternative, and loading dock operations on the Hill Street site would still result in interior noise levels above 45 dB(A). As such, air quality and noise impacts associated with this alternative would be comparable to those of the proposed project. Because this alternative would not avoid or substantially lessen any of the significant impacts of the project as proposed, this alternative has been rejected from further consideration and is not examined in detail in this EIR.

The Broadway Building Replacement Alternative was also considered. However, this alternative was rejected because of its failure to meet the primary objective of the project, which is the rehabilitation of the historic Herald Examiner building. Under this project alternative, a City of Los Angeles Historic-Cultural Monument would be demolished rather than rehabilitated in conformance with the Secretary of the Interior's Standards for Building Rehabilitation, thus resulting in a new significant impact greater than the significant impacts associated with the project as proposed. Because this alternative would not avoid or substantially lessen any of the significant impacts of the project as proposed, and instead would increase the severity of an impact to an historic resource, this alternative has been rejected from further consideration and is not examined in detail in this EIR.

Development of the project, as proposed, on an alternative site was also considered. However, this alternative was also rejected because of its failure to meet the primary objective of the project, which is the rehabilitation of the historic Herald Examiner building. Additionally, this project alternative was rejected because neither the project applicant nor the City owns or controls any other property in the vicinity of the proposed project site. Therefore, the ability of the project applicant to find and purchase an alternative site to develop the project on is considered speculative. While development of the proposed project on an alternate site could potentially avoid the construction of a building incompatible with an existing historic resource, this alternative would actually increase the severity of an impact because the historic resource would not undergo rehabilitation in conformance with the Secretary of the Interior's Standards for Building Rehabilitation. Because this alternative would not avoid or substantially lessen any of the significant impacts of the project as proposed, and instead would increase the severity of an impact to an historic resource, this alternative has been rejected from further consideration and is not examined in detail in this EIR.

As such, the EIR evaluates six alternatives to the proposed project in the sections that follow.

4. RANGE OF ALTERNATIVES

a. Alternative 1 – No Project Alternative

Section 15126.6(e) of the *CEQA Guidelines* requires that a No Project Alternative be evaluated. As described in the *CEQA Guidelines*, the purpose of describing and analyzing the No Project Alternative is to allow decision makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project.

Under the No Project Alternative, all three of the project sites would remain in their existing condition, and the proposed project would not be implemented. The existing Broadway building would remain as-is, unoccupied, and would not be rehabilitated. The existing Press building, on the Hill Street site, would remain as-is, unoccupied except for as an occasional film venue and in its current condition. The existing surface parking lot, located on the 12th Street site, would remain in use as a surface parking lot and remain void of built structures.

b. Alternative 2 – Adaptive Reuse of the Press Building Alternative

Under the Adaptive Reuse of the Press Building Alternative, the project would be dramatically modified from that currently proposed. This alternative is depicted in **Figure VI-3, Alternative 2 – Adaptive Reuse of the Press Building**. The primary difference between this alternative and the proposed project is that under this alternative, the existing Press building located on the Hill Street site would be adapted for reuse rather than demolished and replaced by a 23-story mixed-use building. The Broadway building would undergo rehabilitation in conformance with the Secretary of the Interior's Standards for Rehabilitation, consistent with the proposed project. The 12th Street site, which is currently paved and used as a surface parking lot, would be developed in the same manner as the proposed project with a 37-story mixed-use building.

Reuse of the Press building under this alternative could result in the provision of approximately 50 residential condominium units in the existing 72,000-square-foot building. The building would remain approximately 55 feet tall and no parking spaces would be added to the building, as allowed by the Adaptive Reuse Ordinance. Therefore, under this alternative, the project would consist of the components shown in **Table VI-1, Alternative 2 – Adaptive Reuse of the Press Building Alternative Components**.

Table VI-1
Alternative 2 – Adaptive Reuse of the Press Building
Alternative Components

	Broadway Site	Hill Street Site	12 th Street Site	Total Project
Residential Units	0	50	319	369
Retail (sf)	29,000	0	8,050	37,050
Office (sf)	39,725	0	0	39,725
Service/Storage/ Circulation Space (sf)	21,775	0	39,960	61,735
Indoor Amenities (sf)	0	0	4,630	4,630
Outdoor Amenities (sf)	0	0	100,235	100,235
Parking Stalls	0	0	487	487
Number of Stories	4	3.5	37	
Total Program (sf)	90,500	72,000	370,605	533,105
Lot Size (sf)	41,860	46,220	47,916	135,996

sf = square feet

In order to reuse the Press building, abatement of asbestos-containing materials and lead-based paint would occur, followed by selective demolition, renovation and reconstruction to accommodate the proposed 50 condominium units.

As discussed in the Cultural Resources Technical Report prepared for the proposed project, the Press building has been evaluated and determined not eligible for listing in the National Register of Historic Resources or the California Register of Historic Resources. The Press building is also not a Historic-Cultural Monument within the City of Los Angeles. As such, the building is not considered a discretionary historic resource under CEQA. Rehabilitation and adapted reuse of the Press building is not required to conform to the Secretary of the Interior's Standards for Rehabilitation of a historic resource.

c. Alternative 3 – Replace the Press Building with a Building of a Scale Similar to the Broadway Building

Under the Replace the Press Building with a Building of a Scale Similar to the Broadway Building Alternative, the project would be slightly modified from that currently proposed. This alternative is depicted in **Figure VI-4, Alternative 3 – Replace Press Building with New Building of Similar Scale**. The Broadway building would undergo rehabilitation in conformance with the Secretary of the Interior's Standards for Rehabilitation, consistent with the proposed project. The 12th Street site, which is currently

Figure VI-3, Alternative 2 – Adaptive Reuse of the Press Building

Figure VI-4, Alternative 3 – Replace Press Building with New Building of Similar Scale

paved and used as a surface parking lot, would be developed in the same manner as the proposed project, with a new 37-story mixed-use building. The primary difference between this alternative and the proposed project is that under this alternative, the existing Press building, located on the Hill Street site, would be demolished and replaced by a building designed to be compatible with the adjacent Broadway building such that the Hill Street building would be similar in size, scale and massing to the adjacent Broadway building.

The new building constructed in place of the demolished Press building under this alternative, would be approximately 110,000 square feet and have a maximum height of 80 feet. A majority of the new building would be three stories in height; however, in a small portion of the building, the building would be taller than three stories. The new building would accommodate approximately 66 residential condominium units, and would provide 83 parking spaces. Under this alternative, the project would consist of the components shown in **Table VI-2**, below.

Table VI-2
Alternative 3 – Replace the Press Building with a Building of a Scale
Similar to the Broadway Building – Alternative Components

	Broadway Site	Hill Street Site	12 th Street Site	Total Project
Residential Units	0	66	319	385
Retail (sf)	29,000	0	8,050	37,050
Office (sf)	39,725	0	0	39,725
Service/Storage/ Circulation Space (sf)	21,775	0	39,960	61,735
Indoor Amenities (sf)	0	0	4,630	4,630
Outdoor Amenities (sf)	0	0	100,235	100,235
Parking Stalls	0	83	487	570
Number of Stories	4	8	37	
Total Program (sf)	90,500	110,000	370,605	571,105
Lot Size (sf)	41,860	46,220	47,916	135,996

sf = square feet

d. Alternative 4 – Build to 6:1 FAR Alternative

Under this alternative, the Broadway building would undergo rehabilitation in conformance with the Secretary of the Interior's Standards for Rehabilitation, as in the case of the proposed project. However, the buildings proposed on the Hill Street and 12th Street sites would be reduced in size in comparison to the proposed project. This alternative is depicted in **Figure VI-5, Alternative 4 – Build to 6:1 Floor Area Ratio (FAR), Broadway and Hill Street Sites**, and **Figure VI-6, Alternative 4 – Build to 6:1 Floor Area Ratio (FAR), 12th Street Site**. The buildings would be constructed to the extent permitted by existing allowed floor area ratio (FAR) of 6:1 without any City action required to permit a variance, averaging or

transfer of FAR from the Broadway site to the Hill Street and 12th Street sites. Consequently both the buildings on the Hill Street and 12th Street sites would be reduced in size in order to meet a 6:1 FAR for each individual building. Due to the relatively small scale of the Broadway building, the three sites would average out to well below the 6:1 maximum FAR for the area.

The proposed project FARs for the Hill Street and 12th Street buildings are 6.4:1 and 8.6:1, respectively. The difference in FAR when comparing the proposed project FAR to the alternative project FAR is 0.4 for the Hill Street building and 2.6 for the 12th Street building. The reduced sizes of the alternative project developments would reduce the number of residential units, retail square footage and office space square footage compared to that of the proposed project, as shown in **Table VI-3**, below.

Table VI-3
Alternative 4 – Build to 6:1 FAR
Alternative Components

	Broadway Site	Hill Street Site	12 th Street Site	Total Project
Residential Units	0	220	253	473
Retail (sf)	29,000	2,560	8,050	39,610
Office (sf)	39,725	0	0	39,725
Service/Storage/ Circulation Space (sf)	21,775	31,200	39,960	92,935
Indoor Amenities (sf)	0	0	0	0
Outdoor Amenities (sf)	0	0	0	0
Parking Stalls	0	275	380	655
Number of Stories	4	20	27	
Total Program (sf)	90,500	277,320	287,500	655,320
Lot Size (sf)	41,860	46,220	47,916	135,996
FAR	2.2:1	6:1	6:1	4.8:1

sf = square feet

e. Alternative 5 – Residential in Broadway Building Alternative

Under this project alternative, the Broadway building would be rehabilitated in conformance with the Secretary of the Interior’s Standards for Rehabilitation for new retail, office and residential uses. The building would include approximately 23,650 square feet of retail space on the ground floor facing Broadway and 11th Street. The upper levels would include approximately 32,670 square feet of office space. The building would also include 24 residential units along the western side of the building, utilizing the City’s Adaptive Reuse Ordinance. Development proposed for the Hill Street and 12th Street sites under this alternative would be similar to that planned for the proposed project. The Press building on the Hill Street site would be replaced with a new 23-story, mixed-use building and would contain 235

Figure VI-5, Alternative 4 – Build to 6:1 Floor Area Ratio (FAR), Broadway and Hill Street Sites

Figure VI-6, Alternative 4 – Build to 6:1 Floor Area Ratio (FAR, 12th Street Site

condominium units and approximately 5,900 square feet of retail space on the ground floor. Under this alternative, the 12th Street site would be developed with a 37-story building similar to the proposed project and would contain 330 condominium units. The ground floor would feature approximately 8,050 square feet of retail space. Components of Alternative 5 are summarized in **Table VI-4**, below.

Table VI-4
Alternative 5 – Residential in Broadway Building
Alternative Components

	Broadway Site	Hill Street Site	12 th Street Site	Total Project
Residential Units	24	235	330	589
Retail (sf)	23,650	5,900	8,050	37,600
Office (sf)	32,670	0	0	32,670
Service/Storage/ Circulation Space (sf)	21,775	31,200	39,960	92,935
Indoor Amenities (sf)	0	0	0	0
Outdoor Amenities (sf)	0	0	0	0
Parking Stalls	0	422	487	909
Number of Stories	4	23	37	
Total Program (sf)	92,000	327,000	396,000	815,000
Lot Size (sf)	41,860	46,220	47,916	135,996
FAR	2.2:1	7.1:1	8.3:1	6:1

sf = square feet

f. Alternative 6 – Affordable Housing Alternative: 20–35 Percent Density Bonus Alternative

Senate Bill 1818 authorizes a by-right density bonus of up to 35 percent in development projects when a percentage of residential units are set aside for affordable housing (i.e., low income or very low income).

Under this alternative to the proposed project, a 20–35 percent density bonus would be granted to the proposed 12th Street building as long as 5–11 percent of the units in the building are set aside for very low-income affordable housing. This would increase the total number of units by 20–35 percent in the 12th Street building, resulting in an increase from 319 to between 383 and 430 residential units. Therefore, under this alternative between 5–11 percent of the total residential units in the 12th Street building would be set aside as affordable housing for a very low-income population, resulting in between 19 and 47 affordable residential units. **Table VI-5, Alternative 6 – Affordable Housing Alternative, 20–35 Percent Density Bonus Alternative Components**, lists the components included in this alternative:

Table VI-5
Alternative 6 – Affordable Housing Alternative, 20–35 Percent Density Bonus
Alternative Components

	Broadway Site	Hill Street Site	12 th Street Site	Total Project
Residential Units	0	256	383–430	639–686
Affordable Units	0	0	19	19
Retail (sf)	29,000	2,560	8,050	39,610
Office (sf)	39,725	0	0	39,725
Service/Storage/ Circulation Space (sf)	21,775	31,200	39,960	92,935
Indoor Amenities (sf)	0	1,700	4,630	6,330
Outdoor Amenities (sf)	0	40,065	100,235	140,300
Parking Stalls	0	422	575–645	997–1,067
Number of Stories	4	23	43–48	
Total Program (sf)	90,500	327,000		
Lot Size (sf)	41,860	46,220	47,916	135,996

sf = square feet

5. FINANCIAL FEASIBILITY ANALYSIS OF ALTERNATIVES

Accompanying the definition and design of each project alternative is a financial analysis to determine the net margin of return to determine the financial feasibility of each alternative. The financial analysis takes the net margin return for each separate project component, the Broadway site, Hill Street site and 12th Street site, and the combined project into consideration. The results of the analysis, as shown in **Table VI-6, Financial Feasibility Analysis for Alternatives**, show a baseline scenario, in addition to the six project alternatives. The baseline scenario for the Broadway building, which remains the same for almost of the project alternatives, the exceptions being the No Project Alternative and the Residential in Broadway Building Alternative, demonstrates a net margin of -7.3 percent, which reflects the high cost associated with rehabilitating the building in conformance with the Secretary of Interior’s Standards for Rehabilitation. This figure demonstrates the financial infeasibility of rehabilitating the Broadway building as a stand-alone project. Therefore, development on the other two project sites must subsidize rehabilitation of the Broadway building to render the project as financially feasible. According to industry standard, 20 percent is the minimum acceptable net margin of return for long-term, for-sale housing projects.¹ As shown in the table below, the baseline scenario is the only scenario that approaches the 20 percent net margin return, the industry standard and acceptable rate of return as determined by lending institutions.

¹ Letter from The Ackman-Ziff Real Estate Group, LLC; dated March 10, 2006.

**Table VI-6
Financial Feasibility Analysis for Alternatives**

Scenario	Net Margin			
	Broadway Building	Hill Street Building	12 th Street Building	Total Project
Baseline – Proposed Project	-7.3%	20.9%	21.8%	19.5%
Alternative 1 – No Project	N/A	N/A	N/A	N/A
Alternative 2 – Adaptive Reuse	-7.3%	-58.9%	21.8%	13.6%
Alternative 3 – Replace Press Building	-7.3%	8.4%	21.8%	16.4%
Alternative 4 – 6:1 FAR	-7.3%	12.6%	19.3%	14.2%
Alternative 5 – Residential in Broadway	-16.3%	20.9%	21.8%	18.3%
Alternative 6 – Affordable Housing (20-35%)	-7.3%	20.9%	14.9%	16.1%

Source: Memorandum from Urban Partners, LLC Re: Herald Examiner Project EIR Alternatives – Financial Feasibility Analysis; Dated March 13, 2006.

6. ENVIRONMENTAL ANALYSIS OF ALTERNATIVES

Section IV, Environmental Impact Analysis, of this EIR identifies four significant unavoidable impacts that would result from the project as proposed. The construction of the new mixed-use building adjacent to the historic Broadway building would result in significant unavoidable adverse impacts to a cultural resource, to visual resources, to air quality and to noise. Mitigation measures are available to reduce the severity of significant cultural resource impacts associated with the proposed project; however, not to a level determined to be less than significant. Mitigation is also available to reduce the severity of the visual incompatibility between the rehabilitated historic Broadway building and the new Hill Street building. However, due to the proposed mass and height of the new Hill Street building relative to the adjacent Broadway building, significant unavoidable impacts associated with visual incompatibility would remain.

Construction and operation of the proposed project would also result in significant impacts associated with air quality. During both project construction and operation, both ROC and NO_x emissions would exceed established thresholds of significance. Even through the implementation of mitigation measures, air quality impacts would remain significant and unavoidable. Operation of the proposed Hill Street building would result in significant noise impacts. Interior noise levels in the residential units at the Hill Street building would remain above 45 dB(A) due to operations at the loading docks. Mitigation is available to reduce this impact, although not to less than significant level. Therefore, even through the implementation of mitigation measures, noise impacts at the Hill Street building would remain significant and unavoidable. The analysis in this Draft EIR indicates that the proposed project would potentially impact the environment in the areas of geology, water resources, transportation, hazards, noise, public services and public utilities. As discussed in the Draft EIR, the implementation of mitigation measures recommended by the Draft EIR would lessen these impacts to less than significant levels.

The alternatives analyzed in this EIR respond to the requirements of CEQA to present analysis of a range of reasonable alternatives that can avoid or lessen these impacts while meeting the basic objectives of the proposed project. A summary comparison of impacts of alternatives to the proposed project is shown in **Table VI-7**, below.

**Table VI-7
Project Alternatives Impact Summary Comparison**

	Project Alternatives					
	Alternative 1 No Project	Alternative 2 Adaptive Reuse	Alternative 3 Replace Press Building	Alternative 4 6:1 FAR	Alternative 5 Residential in Broadway	Alternative 6 Affordable Housing (20- 35% Bonus)
Land Use & Planning	--	=	=	=	=	=
Population & Housing	=	=	=	=	=	=
Geology	=	=	=	=	=	=
Water Resources		=	=	=	=	=
Air Quality	+	+	+	+	=	=
Transportation	=	=	=	=	=	=
Hazards & Hazardous Materials	--	=	=	=	=	=
Noise	--	=	=	=	=	=
Public Services	=	=	=	=	=	=
Public Utilities	=	=	=	=	=	=
Visual Resources	+	+	+	=	=	=
Cultural Resources	--	+	+	=	=	=
Meets All Project Objectives	NO	PARTIALLY	PARTIALLY	PARTIALLY	YES	PARTIALLY

- + *Alternative reduces environmental impacts and thus is environmentally superior*
 = *Alternative does not change the significance of environmental impacts after mitigation*
 -- *Alternative increases environmental impacts and thus is not environmentally superior*

a. Alternative 1 – No Project Alternative

As stated above, under the No Project Alternative the project sites would remain in their present condition. Consequently, potential project-related impacts described throughout the EIR would not occur. The following analysis provides a summary of anticipated impacts associated with the No Project Alternative.

Land Use

Under the No Project Alternative, the current underutilized Broadway and Press buildings would remain on the sites, and the surface parking lot on the 12th Street site would continue to operate. All three of these project sites lie within the Central City Community Plan Area, the Central Business District Redevelopment Project Area and the City Center Redevelopment Project Area. By not redeveloping these three sites to implement the goals and objectives outlined in the Central City Community Plan, the Central Business District Redevelopment Plan and the City Center Redevelopment Plan, land use and planning impacts would be greater under this alternative than those anticipated with implementation of the proposed project. Consequently, this alternative is not considered environmentally superior with respect to land use.

Population and Housing

Under the No Project Alternative, the current underutilized Broadway and Press buildings would remain on the sites, and the surface parking lot on the 12th Street site would continue to operate. No new residential units would be constructed and no new residents or employees would be introduced to the project sites. However, neither the project nor this alternative would result in population and/or housing growth in excess of the projected population growth for the Central City area and the City of Los Angeles. Consequently, this alternative is not considered environmentally superior with respect to population growth as neither the proposed project nor this alternative would result in significant population growth impacts.

Geology

Under the No Project Alternative, the current buildings and uses on the three project sites would remain undisturbed. No demolition, excavation or construction activities would occur, and no soils would be disturbed. Therefore, no impacts associated with geology would result from the No Project Alternative, and potential geologic impacts for this alternative would be less than those of the proposed project. Since any potential impacts to site geology would be avoided, this alternative is considered incrementally superior with respect to geology, but since the project does not have any significant impacts to geology after mitigation, this alternative is not technically environmentally superior.

Water Resources

Under the No Project Alternative, the current buildings and uses on the three project sites would remain undisturbed. All site hydrology, runoff, surface water quality and groundwater quality would remain unaffected and unchanged under the No Project Alternative. Therefore, no impacts associated with

water resources would result from the No Project Alternative and potential water resources impacts for this alternative would be less than those of the proposed project. Since any potential impacts to water resources would be avoided, this alternative is considered incrementally superior with respect to water resources, but since the project does not have any significant impacts to water resources after mitigation, this alternative is not technically environmentally superior.

Air Quality

Under the No Project Alternative, the current buildings and uses on the three project sites would remain undisturbed. No construction activities would occur on the project sites and no additional vehicle trips would be generated. Therefore, no construction or operational emission increases would result from the No Project Alternative. As such, the No Project Alternative would avoid significant air quality impacts associated with the proposed project; therefore, this alternative is considered environmentally superior with respect to air quality.

Transportation

Under the No Project Alternative, the current buildings and uses on the three project sites would remain undisturbed. No construction vehicle trips or new operational vehicle trips would be generated. Therefore, no transportation impacts would result from the No Project Alternative. While, the No Project Alternative would result in fewer transportation impacts than the proposed project, neither the proposed project nor this alternative would result in significant transportation impacts. Consequently, this alternative is not considered environmentally superior with respect to transportation impacts.

Hazards and Hazardous Materials

Under the No Project Alternative, the current buildings and uses on the three project sites would remain undisturbed. However, under the No Project Alternative, the known asbestos-containing material and lead-based paint in both the Broadway and Press buildings would not be removed; these materials would remain in the two existing buildings. As such, the No Project Alternative would result in leaving known hazardous materials in the buildings; therefore, potentially significant hazardous materials impacts could result and impacts would be greater than those anticipated for the proposed project. Consequently, this alternative has the potential to result in significant impacts in comparison to the proposed project. As such, this alternative is not considered environmentally superior with respect to hazards and hazardous materials.

Noise

Under the No Project Alternative, the current buildings and uses on the three project sites would remain undisturbed. No construction activities would occur on the project sites and no additional operational noise sources or vehicle trips would be generated. Therefore, no construction or operational noise increases would result from the No Project Alternative. As such, the No Project Alternative would not result in impacts to noise, and thus, would avoid significant operational noise impacts associated with the proposed project. Since the significant operational noise impact of the proposed project would be avoided, this alternative is considered environmentally superior with respect to noise.

Public Services

Under the No Project Alternative, the current underutilized Broadway and Press buildings would remain on the sites, and the surface parking lot on the 12th Street site would continue to operate. No additional demand beyond that currently generated by the existing on-site uses would occur for police, fire, school, library and recreation services. As such, the No Project Alternative would not result in impacts to public services, and thus, fewer impacts than those anticipated to result from the proposed project. However, since neither the proposed project nor this alternative would result in significant public services impacts, this alternative is not considered environmentally superior with respect to public services.

Public Utilities

Under the No Project Alternative, the current underutilized Broadway and Press buildings would remain on the sites, and the surface parking lot on the 12th Street site would continue to operate. No additional demand beyond that currently generated by the existing on-site uses would occur for water, wastewater, solid waste and energy services. As such, the No Project Alternative would not result in impacts to public utilities and thus fewer impacts to public utilities than those anticipated to result from the proposed project. However, since neither the proposed project nor this alternative would result in significant public utilities impacts, this alternative is not considered environmentally superior with respect to public utilities.

Visual Resources

Under the No Project Alternative, the current underutilized Broadway and Press buildings would remain on the sites and the surface parking lot on the 12th Street site would continue to operate. The existing visual character of the project sites and views within the vicinity of the project sites would remain unchanged. Therefore, no change to the visual resources would occur, and no significant visual resource incompatibility impacts would result. The No Project Alternative would avoid a significant impact

relative visual incompatibility; as such, this alternative is environmentally superior with respect to visual resources.

Cultural Resources

Under the No Project Alternative, the current underutilized Broadway and Press buildings would remain on the sites, and the surface parking lot on the 12th Street site would continue to operate. Under the No Project Alternative, the Broadway building and the adjacent Press building would remain in their deteriorated conditions and unoccupied. Development of the Hill Street building as proposed would no longer be constructed on the Hill Street site; the existing Press building, which is not an historic resource, would remain.

However, under this project alternative, the historic Broadway building would not be rehabilitated in conformance with the Secretary of the Interior's Standards for Rehabilitation. Thus, further deterioration of a historic resource would result under the No Project Alternative. As such, impacts to cultural resources under the No Project Alternative would be greater than those anticipated with implementation of the proposed project due to the potential for further degradation of a historic resource. Consequently, this alternative is not considered environmentally superior with respect to impacts upon cultural resources.

Relation to Project Objectives

The No Project Alternative would not be consistent with policies defined in the City of Los Angeles General Plan, which seeks to promote housing for all income levels and neighborhood-oriented businesses. Nor would this alternative achieve any of the following project objectives: rehabilitate the historic Herald Examiner building; provide additional off-street parking for the historic Herald Examiner building; provide additional housing convenient to downtown, in the City of Los Angeles; provide office, retail shopping and dining opportunities for the community; implement goals and objectives outlined in the Central Business District Redevelopment Plan and City Center Redevelopment Plan; improve streetscapes in the vicinity of the project sites; or abate hazardous materials.

As such, implementation of the No Project Alternative would not meet any of the objectives for the proposed project.

Conclusion

Implementation of the No Project Alternative would avoid most of the environmental impacts associated with the proposed project; however, under the No Project Alternative, greater impacts to an historic

resource would result, as a recognized historic resource would not undergo rehabilitation. This alternative would also result in greater impacts associated with hazards and hazardous materials, as known hazards would not be removed from the Broadway and Press buildings. Additionally, this alternative would not meet any of the project objectives. Therefore, since this alternative would result in greater impacts to cultural resources and hazards and hazardous materials in comparison to the proposed project, this alternative is not considered environmentally superior.

b. Alternative 2 – Adaptive Reuse of the Press Building Alternative

This alternative would result in the redevelopment of the existing Press building on the Hill Street site, rehabilitation of the Broadway building and construction of a 37-story mixed use building on the 12th Street site. Alternative 2 would provide approximately 369 residential dwelling units, 37,050 square feet of retail space, 39,725 square feet of office space, 487 parking stalls and would have a total program square footage of approximately 533,105 square feet, as detailed in **Table VI-1**. Potential environmental impacts associated with Alternative 2 are discussed below.

Land Use

Development of this alternative would be done in accordance with existing provisions of the Central City Community Plan, the Central Business District Redevelopment Plan and the City Center Redevelopment Plan. However, as with the proposed project, this alternative would still require the transfer or average of additional FAR and unit density credits from the Broadway site to the 12th Street site. Further, this alternative would provide fewer residential units than the proposed project. Consequently, this alternative would not achieve the objectives outlining the provision for housing within the South Park neighborhood in the Central City Community Plan and Central Business District Redevelopment Plan to the same extent as the proposed project and would still require a approval from the City of Los Angeles to allow additional FAR on the 12th Street site. As such, this alternative is not considered environmentally superior with respect to land use.

Population and Housing

This alternative would provide 206 fewer residential units than the proposed project; therefore, approximately 697 individuals would occupy the residential units under this alternative, as opposed to the approximately 1,087 individuals under the proposed project. Implementation would also result in the creation of approximately 260 employees, similar to the employment rate expected under the proposed project. Therefore, the potential population and housing associated with this alternative would be less than the growth anticipated to result from the proposed project. However, neither the project nor this alternative would result in population and/or housing growth in excess of the projected population

growth for the Central City area and the City of Los Angeles. Consequently, this alternative is not considered environmentally superior with respect to population growth as neither the proposed project nor this alternative would result in significant population growth impacts.

Geology

The alternative project would have minimal geology and soils impacts. This alternative would utilize two existing structures and would only require the demolition of the surface parking lot on the 12th Street site in order to complete the project. Therefore, in comparison to the proposed project, this alternative would require less soil disturbance. The alternative project, which includes rehabilitation of the Broadway building, renovation of the Press building and construction of a new building on the 12th Street site, would be subject to the same mitigation measures outlined in **Section IV.C, Geology** of this EIR. Impacts upon geology for this project alternative would be considered less than significant, similar to the proposed project. Consequently, neither the proposed project nor this project alternative would result in significant geology impacts. As such, this alternative is not considered environmentally superior with respect to geology.

Water Resources

The project alternative would be smaller in scale than the proposed project yet place a similar demand on the stormwater drainage system. The same amount of impermeable surface as the proposed project would be found in the project alternative, and both the proposed project and this project alternative would be subject to the requirements of the State Water Resources Control Board to obtain a National Pollution Discharge Elimination System (NPDES) permit. Consequently, neither the proposed project nor this project alternative would result in significant water resource impacts. As such, this alternative is not considered environmentally superior with respect to water resources.

Air Quality

Air quality impacts are evaluated in two categories, construction emissions and operational emissions. Construction-related emissions are associated with construction activities such as demolition, earthmoving, use of construction equipment and application of coatings to surfaces. Operational emissions are associated with (1) stationary sources such as the use of natural gas in building operations and landscape maintenance equipment; and (2) mobile sources associated with vehicle trips generated by the project. Implementation of this alternative would result in fewer emissions being generated than the proposed project, as both the Broadway building and Press building would remain.

Therefore, no demolition or earthmoving activities would occur on these two sites. Additionally, under this alternative, approximately 390 fewer residents would be introduced to the site; therefore, approximately 1,215 fewer daily vehicle trips would occur. As such, overall construction and operational emissions are not anticipated to result in significant air quality impacts and thus would be less than the impacts generated by the proposed project. For this reason, this alternative is considered environmentally superior with respect to air quality.

Transportation

A traffic analysis was prepared analyzing the potential impacts to traffic and circulation resulting from implementation of the proposed project. Under this alternative 206 fewer residential units would be provided; as such, approximately 390 fewer residents would occupy the new buildings and approximately 1,215 fewer daily trips would be generated by this alternative. Additionally, approximately 79 fewer AM peak hour trips and approximately 108 fewer PM peak hour trips would result, daily, through the implementation of this project alternative. This alternative would impact the same intersections as the proposed project during both the AM and PM peak hours. Therefore, this alternative would have less of an impact on future traffic and the level of service for intersections and roadways in the project vicinity. Although it was determined in **Section IV.F, Transportation** of this EIR that the proposed project would not have a significant impact with regards to transportation and traffic, the project alternative would fewer impacts on transportation and traffic. However, neither the proposed project nor this project alternative would result in significant transportation impacts. Consequently, this alternative is not considered environmentally superior with respect to transportation and traffic impacts.

Hazards and Hazardous Materials

Environmental site assessments, asbestos and lead surveys, and the methane survey for the proposed project documented existing conditions relative to the presence of hazards and hazardous materials on each of the three project sites. The results from each of these investigations are summarized in **Section IV.G, Hazards and Hazardous Materials** of this EIR. Implementation of this alternative would require the same remediation of asbestos-containing materials and lead-based paint identified within the existing Broadway building and Press building. Under this alternative, the reuse of the Broadway building and Press building, and the construction of a new mixed-use building on the 12th Street site would result in the presence of similar hazards and hazardous materials on each of the sites. As in the case of the proposed project, all potential impacts associated with hazards and hazardous materials can be reduced to less than significant levels with mitigation. Since neither the proposed project nor this project alternative would result in significant hazards and hazardous materials impacts, this project alternative is not considered environmentally superior with respect to hazards and hazardous materials.

Noise

The amount of noise generated during construction and operation of a project can be related to the intensity of development as well as the nature and location of this development activity. Given the reduced size of this alternative, construction activities under this alternative would occur over a shorter period of time than that required for the proposed project. However, distance between the noise source and surrounding noise sensitive land uses would remain unchanged. Operationally, use of the loading dock at the reused Press building would still have the potential to result in interior noise levels above 45 dB(A). As such, both the proposed project and this project alternative could result in potentially significant operational noise impacts. Consequently, this project alternative is not considered environmentally superior with respect to noise.

Public Services

With regard to police and fire protection services, implementation of this alternative would result in a smaller population increase, as compared to the proposed project. Under the proposed project, approximately 1,087 individuals would occupy the 575 new condominium units. However, under this alternative, approximately 697 individuals would occupy the 369 new condominium units. Based on a smaller resident population, it is expected that fewer calls for service would be generated by this alternative in comparison to the proposed project. Demand on library, park and recreational services is also expected to be less due to a smaller population increase. Similarly, fewer public school students would likely be residents on site under this project alternative in comparison to the proposed project, and therefore, less of a demand would be placed on the Los Angeles Unified School District (LAUSD) schools. Thus, it is expected that this alternative would result in less of an impact on the Los Angeles Police Department, Los Angeles Fire Department, the Los Angeles Public Library system, City of Los Angeles Parks and Recreation facilities and LAUSD schools in comparison with the proposed project. However, as determined in **Section IV.I, Public Services** of this EIR, the proposed project would not result in significant impacts to public services. Consequently, this alternative is not considered environmentally superior with respect to public services, since neither the proposed project nor this project alternative would result in significant public services impacts.

Public Utilities

Impacts related to water, wastewater, solid waste and energy under this alternative would likely be less than those generated by the proposed project. Given the reduced size of the alternative project, there would be approximately 390 fewer residents than under the proposed project and a comparable number employees; therefore, this project alternative would result in less of a demand for utility services.

However, as determined in **Section IV.J, Public Utilities** of this EIR, the proposed project would not result in significant impacts to public utilities. Consequently, this alternative is not considered environmentally superior with respect to public utilities, since neither the proposed project nor this alternative would result in significant public utilities impacts.

Visual Resources

Under this alternative, the existing Press building would remain, and thus, would not affect the visual character and surrounding area of the Broadway building. As a result, the visual character of the historic Broadway building would not be significantly affected such that a visual incompatibility would result. Additionally, by keeping development on the Hill Street site at a lower height, greater visibility of the Broadway building and the project area would be provided. For the Broadway and Hill Street sites, this alternative would have no visual impacts with respect to the surrounding downtown area because on these two sites, the project would be utilizing existing buildings; thus, a significant visual resource impact associated with visual incompatibility between the Broadway and Hill Street buildings would be avoided. However, a new mixed-use building would still be constructed on the 12th Street site. This alternative would have a similar intensity of light sources as utilized for the proposed project, which would be of similar intensity to the surrounding land uses near the project sites. The reduced height of the buildings would reduce shadows cast on surrounding uses compared with the proposed project. Similar to the proposed project, this alternative would result in a less than significant impact with respect to shadows.

Consequently, since this alternative would reuse the existing Press building and avoid the construction of a new high-rise building on the Hill Street site, this alternative would avoid the unavoidable significant visual resource impact anticipated with implementation of the proposed project. Therefore, this alternative would be considered environmentally superior with respect to visual resources.

Cultural Resources

Although the Press building, located on the Hill Street site, is not considered a cultural resource as determined by the Cultural Resources Technical Report in **Appendix IV.L**, prepared for this EIR, the size, scale and massing of the Press building has been determined to affect the adjacent Broadway building, which is a cultural historic resource. As discussed in **Section IV.L, Cultural Resources** of this EIR, construction of the proposed structure on the Hill Street site would be of a size, scale, proportion and mass that would alter the immediate surroundings of the historic Broadway building in a manner that reduces the historic significance of the Broadway building. The new construction adjacent to the Broadway building would affect the existing setting and spatial relationships of the Broadway building,

and the mass and height of the Hill Street building would have the potential to visually compete with and overwhelm the rehabilitated historic Broadway building and result in an indirect impact as a result of impairing the building's immediate surroundings. While mitigation would reduce this impact to the extent feasible, the impact cannot be reduced to a level that is less than significant due to the sheer height of the Hill Street building. This alternative project would renovate and utilize the existing Press building adjacent to the Broadway building instead of replacing it as in the proposed project. This alternative project would conform to the Secretary of the Interior's Standards 1 through 10. However, given that the adjacent rehabilitated Press building would better complement the Broadway building's size, scale, proportion, massing and height, this project alternative would avoid significant impacts to the historic Broadway building. Since the significant cultural resource impact of the proposed project would be avoided through the implementation of this project alternative, this alternative is considered environmentally superior with respect to cultural resources.

Relation to Project Objectives

Adaptive reuse of both the Broadway and Press building, and construction of the mixed-use building on the 12th Street site would partially meet some of the project objectives. However, under this alternative, approximately 206 fewer dwelling units would be developed, thus, reducing the number of units available to individuals opting to live in the Downtown Los Angeles area. Therefore, under this alternative, the project objectives of providing housing, retail shopping, commercial uses and dining opportunities in the Downtown area, providing dedicated off-street parking for the historic Broadway building and enhancing the property tax base for the Central Business District and City Center Redevelopment Project Areas would not be achieved to the same extent as with the proposed project.

Conclusion

As shown in **Table VI-7**, implementation of this alternative would avoid potentially significant impacts to air quality, visual resources and cultural resources as compared with the proposed project; however, this alternative would not avoid or change the significance of impacts associated with land use and planning, population and housing, geology, water resources, transportation, hazards and hazardous materials, noise, public services, or public utilities as compared to the proposed project; operational noise impacts would remain significant and unavoidable under this alternative. As such, Alternative 2 avoids some significant environmental impacts but only partially meets project objectives, in comparison with the proposed project.

While this project alternative does avoid significant impacts to cultural resources, visual resources and air quality as shown in **Table VI-6**, this alternative would be financially infeasible and would not be

constructed, as it would only result in a 13.6 percent net margin of profit upon build out. In addition to being financially infeasible, this alternative design assumes the majority of parking for the rehabilitated Press building and Broadway building would be located off site at the 12th Street site, thus, rendering the project unable to be financed and at a competitive disadvantage in the marketplace. As such, this alternative limits the returns on the project investment such that the project would no longer be economically feasible for the applicant.

c. Alternative 3 – Replace the Press Building with Building of Similar Scale Alternative

Implementation of Alternative 3 would result in the replacement of the Press building on the Hill Street site, with a new building of similar height and scale to the adjacent Broadway building. As detailed in **Table VI-2**, this alternative would provide 385 residential dwelling units, 37,050 square feet of retail space, 39,725 square feet of office space, a total of 570 underground parking stalls, 487 of which would be provided at the 12th Street building and 83 of which would be provided at the Hill Street building, and a total program square footage of approximately 571,105 square feet.

Land Use

Development of this alternative would be done in accordance with existing provisions of the Central City Community Plan, the Central Business District Redevelopment Plan, and the City Center Redevelopment Plan. However, this alternative would still require the transfer of additional FAR from the Broadway site to the 12th Street site or other additional FAR and residential density approval, and this alternative would provide **190** fewer residential units than the proposed project. Consequently, this alternative would not achieve the objectives of providing housing within the South Park neighborhood in the Central City Community Plan and Central Business District Redevelopment Plan to the same extent as the proposed project and would still require discretionary approvals under the City of Los Angeles Municipal Code. However, neither the proposed project nor this alternative would result in significant land use impacts; therefore, this alternative is not considered environmentally superior with respect to land use.

Population and Housing

This alternative would provide 190 fewer residential units than the proposed project; therefore, approximately 728 individuals would occupy the residential units under this alternative, as opposed to the approximately 1,087 individuals under the proposed project. Implementation would also result in the creation of approximately 260 employees, similar to the employment rate expected under the proposed project. Therefore, the potential population and housing associated with this alternative would be less than anticipated as a result of the proposed project. However, neither the project nor this alternative

would result in population and/or housing growth in excess of the projected population growth for the Central City area and the City of Los Angeles. Consequently, this alternative is not considered environmentally superior with respect to population growth as neither the proposed project nor this alternative would result in significant population growth impacts.

Geology

The component on the Hill Street site of this project alternative would be smaller in height than the proposed project but would still require excavation for construction of the subterranean parking structure. Construction and excavation activities on the 12th Street site would be comparable to those anticipated for the proposed project on the 12th Street site. Consequently, this alternative project would be subject to the same mitigation measures outlined in Section IV.C, Geology of this EIR. The project alternative impacts on geology would be comparable with those of the proposed project. Consequently, neither the proposed project nor this project alternative would result in significant geology impacts. As such, this alternative is not considered environmentally superior with respect to geology.

Water Resources

The project alternative would be smaller in scale than the proposed project yet place a similar demand on the stormwater drainage system. The same amount of impermeable surfaces as the proposed project would be constructed under the project alternative, and both the proposed project and this project alternative would be subject to the requirements of the State Water Resources Control Board to obtain a NPDES permit. Consequently, neither the proposed project nor this project alternative would result in significant water resource impacts. As such, this alternative is not considered environmentally superior with respect to water resources.

Air Quality

Air quality impacts are evaluated in two categories: construction emissions and operational emissions. Construction-related emissions are associated with construction activities such as demolition, earthmoving, use of construction equipment and application of coatings to surfaces. Operational emissions are associated with (1) stationary sources such as the use of natural gas in building operations and landscape maintenance equipment; and (2) mobile sources associated with vehicle trips generated by the project. Implementation of this alternative would result in fewer emissions being generated than with the proposed project. Under this alternative, the Broadway building would remain in place and a smaller scale building would be constructed in place of the Press building. However, a total of 83 underground parking spaces would still be provided beneath the Hill Street building under this project alternative; therefore, during construction, earthmoving, excavation and construction activities would still occur on

the Hill Street site. Under this alternative, approximately 359 fewer residents would be introduced to the site, thus resulting in approximately 1,129 fewer daily vehicle trips. As such, overall construction and operational emissions would be less than those generated by the proposed project, and thus, would have the potential to avoid significant operational air quality impacts. For this reason, this alternative is considered environmentally superior with respect to air quality.

Transportation

A traffic analysis analyzed the potential impacts to traffic and circulation that would result from the implementation of the proposed project. According to this traffic analysis, there is no potential for significant impacts associated with transportation and traffic for the proposed project. Under this alternative 190 fewer residential units would be provided; as such, approximately 359 fewer residents would occupy the project, and, thus, approximately 1,129 fewer daily trips would be generated by this alternative. Additionally, approximately 73 fewer AM peak hour trips and approximately 100 fewer PM peak hour trips would result, daily, through the implementation of this project alternative. This alternative would impact the same intersections as the proposed project during the both the AM and PM peak hours because the alternative project would be constructed on the same sites. Therefore, this alternative would result in less of an impact on future traffic and the level of service for intersections and roadways in the project vicinity. Although it was determined in **Section IV.F, Transportation** of this EIR that the proposed project would not have a significant impact with regards to transportation and traffic, the project alternative would have an incrementally smaller impact on transportation and traffic as approximately 1,129 fewer daily vehicle trips would result from implementation of this alternative. However, since neither the proposed project nor this alternative would result in significant transportation impacts, this alternative is not considered environmentally superior with respect to transportation.

Hazards and Hazardous Materials

Environmental site assessments, asbestos and lead surveys, and the methane survey for the proposed project documented existing conditions relative to the presence of hazards and hazardous materials on each of the three project sites. The results from each of these investigations are summarized in **Section IV.G, Hazards and Hazardous Materials** of this EIR. Implementation of this alternative would require the same remediation of asbestos-containing materials and lead-based paint identified within the existing Broadway building and Press building. Under this alternative, the reuse of the Broadway building, the demolition of the Press building and construction of a replacement building, and the construction of a new mixed-use building on the 12th Street site would result in the presence of similar hazards and hazardous materials on each of the sites. As in the case of the proposed project, all potential impacts associated with hazards and hazardous materials can be reduced to less than significant levels with

mitigation. Consequently, this alternative is not considered environmentally superior with respect to hazards and hazardous materials.

Noise

The amount of noise generated during construction and operation of a project can be related to the intensity of development as well as the nature and location of this development activity. Given the reduced size of this alternative, construction activities under this alternative would occur over a shorter period of time than that required for the proposed project. However, distance between the noise source and surrounding noise sensitive land uses would remain unchanged. Therefore, this alternative would still result in short-term construction noise impacts. Operationally, use of the loading dock at the newly constructed Hill Street building would still result in the potential for interior noise levels inside the building to exceed 45 dB(A). Consequently, this alternative is not considered environmentally superior with respect to noise impacts as it would not avoid or substantially lessen the significant operational noise impacts identified for the proposed project.

Public Services

With regard to police and fire protection services, implementation of this alternative would result in a smaller population increase, as compared with the proposed project. With implementation of the proposed project, approximately 1,087 individuals would occupy the 575 new condominium units. However, under this project alternative, approximately 728 individuals would occupy the 385 new condominium units. Based on a smaller resident population, it is expected that fewer calls for service would be generated under this alternative when compared with the proposed project. Demand on library, park and recreational services is also expected to be less due to a smaller population increase. Similarly, fewer public school students would reside on site under this project alternative when compared with the proposed project; therefore, incrementally less demand would be placed on the LAUSD schools. Thus, it is expected that this alternative would result in less of an impact on the Los Angeles Police Department, Los Angeles Fire Department, the Los Angeles Public Library system, City of Los Angeles Parks and Recreation facilities, and LAUSD schools in comparison with the proposed project. However, as determined in **Section IV.I, Public Services** of this EIR, the proposed project would not result in significant impacts to public services. Consequently, this alternative is not considered environmentally superior with respect to public services, since neither the proposed project nor this project alternative would result in significant public services impacts.

Public Utilities

Impacts related to water, wastewater, solid waste and energy under this alternative would likely be less than those generated by the proposed project. Due to the reduced size of this project alternative, there would be approximately 359 fewer residents than with implementation of the proposed project and a comparable number of employees; as such, this project alternative would result in less of a demand for utility services. However, as determined in **Section IV.J, Public Utilities** of this EIR, the proposed project would not result in significant impacts to public utilities. Consequently, this alternative is not considered environmentally superior with respect to public utilities, since neither the proposed project nor this alternative would result in significant public utilities impacts.

Visual Resources

Under this alternative, the Press building would be demolished and replaced by a building designed to be compatible with the neighboring Broadway building such that the building would be of similar scale, height and mass to the adjacent Broadway building. The two buildings would be comparable in size and the new building would not detract from or be visually incompatible with the adjacent historic Broadway building. Additionally, by keeping development on the Hill Street site at a height comparable to the adjacent Broadway building, greater visibility of the project area would be provided. For the Broadway site, this alternative would have no visual impacts with respect to the surrounding downtown area because on this site, the project would be utilizing the existing building. On the Hill Street site, a new mixed-use building would be constructed. The building would be designed to be compatible with the Broadway building and would be of similar scale, height and mass to the adjacent Broadway building. And, similar to the proposed project, a new mixed-use building would be constructed on the 12th Street site. This alternative would have a similar intensity of light sources as utilized for the proposed project, which would be of similar intensity to the surrounding land uses near the project sites. The reduced height of the buildings would reduce shadows cast on surrounding uses compared with the proposed project. Similar to the proposed project, this alternative would result in a less than significant impact with respect to shadows.

Consequently, since this alternative would replace the existing Press building with a building of similar design, mass and height as the adjacent Broadway building, this alternative would avoid the unavoidable significant visual resource impact resulting from visually incompatibility anticipated with implementation of the proposed project. Therefore, this alternative is considered environmentally superior with respect to visual resources.

Cultural Resources

As discussed in **Section IV.L, Cultural Resources** of this EIR, construction of the proposed structure on the Hill Street site would be of a size, scale, proportion and mass that would alter the immediate surroundings of the historic Broadway building in a manner that reduces the historic significance of the Broadway building. The new construction adjacent to the Broadway building would affect the existing setting, and spatial relationships of the Broadway building and the mass and height of the Hill Street building would have the potential to visually compete with and overwhelm the rehabilitated historic Broadway building and result in an indirect impact as a result of impairing the building's immediate surroundings. While mitigation would reduce this impact to the extent feasible, the impact cannot be reduced to a level that is less than significant due to the sheer height of the Hill Street building.

Under this alternative, the Hill Street building would be similar to the size, scale, proportion, massing and height of the Broadway building, and therefore, more compatible with the Broadway building. Due to the compatible scale of the Hill Street building under this project alternative, this alternative would neither affect the existing setting or spatial relationships of the existing and newly constructed building or visually compete with or overwhelm the historic Broadway building, nor would this alternative impair the building's immediate surroundings. Therefore, this project alternative would have a less than significant impact on the adjacent Broadway building. Consequently, since the significant cultural resources impact associated with the proposed project would be avoided by constructing a building of similar size, scale, proportion and mass to the adjacent Broadway building on the Hill Street site, this alternative would be considered environmentally superior with respect to cultural resources.

Relation to Project Objectives

Rehabilitation and adaptive reuse of the Broadway building, replacement of the Press building with a building of similar scale to the Broadway building on the Hill Street site, and construction of the mixed-use building on the 12th Street site would partially meet all of the project objectives. However, under this alternative, approximately 190 fewer dwelling units would be developed, thus reducing the number of units available to individuals opting to live in the Downtown Los Angeles area. Therefore, under this alternative, the project objectives of providing housing, retail shopping, commercial uses and dining opportunities in the Downtown Los Angeles area and enhancing the property tax base for the Central Business District and City Center Redevelopment Project Areas would not be achieved to the same extent as with the proposed project.

Conclusion

As shown in **Table VI-7**, implementation of this alternative would avoid significant impacts to air quality, visual resources and cultural resources as compared with the proposed project; however, this alternative would not avoid or change the significance of impacts associated with land use, population and housing, geology, water resources, transportation, hazards and hazardous materials, noise, public services or public utilities as compared to the proposed project; operational noise impacts would remain significant under this alternative. As such, Alternative 3 avoids some significant environmental impacts but only partially meets project objectives, in comparison to the proposed project.

While this project alternative does avoid significant impacts to cultural resources, visual resources and air quality, as shown in **Table VI-6**, construction of this alternative would only result in a 16.4 percent net margin of profit upon build out, which renders it financially infeasible. In addition to being financially infeasible, this alternative design assumes that only 83 parking spaces would be provided at the Hill Street building, while the remainder of the parking spaces for the Hill Street building would be located off-site at the 12th Street site, thus, rendering the project unable to be financed and at a competitive disadvantage in the marketplace. As such, this alternative limits the returns on the project investment such that the project would no longer be economically feasible for the applicant.

d. Alternative 4 – Build to 6:1 FAR Alternative

Implementation of Alternative 4 would result in the rehabilitation of the Broadway building in conformance with the Secretary of the Interior’s Standards for Rehabilitation and construction of new mixed-use buildings on the Hill Street and 12th Street sites. Each of the two buildings would be constructed with a floor area ratio (FAR) of 6:1. As detailed in **Table VI-3**, Alternative 4 would result in the construction of a total of approximately 473 residential dwelling units, 39,610 square feet of retail space, 39,725 square feet of office space, 655 parking stalls, and a total program square footage of approximately 655,320 square feet.

Land Use

Development of this alternative would result in the build out of the Hill Street and 12th Street sites within the existing 6:1 FAR provisions of the Central City Community Plan, the Central Business District Redevelopment Plan, and the City of Los Angeles Municipal Code without approval for the averaging or additional FAR. Although, this alternative would provide 102 fewer residential units than the proposed project and would not achieve the objectives outlining the provision for housing within the South Park neighborhood in the Central City Community Plan, Central Business District Redevelopment Plan and City Center Redevelopment Plan Areas to the same extent as the proposed project, this alternative would

result in comparable impacts to the proposed project in terms of land use and planning consistency. Consequently, this alternative is not considered environmentally superior with respect to land use, as neither the proposed project nor this alternative would result in significant land use impacts.

Population and Housing

This alternative would provide approximately 102 fewer residential units than the proposed project; therefore, approximately 894 individuals would occupy the residential units under this alternative, as opposed to the approximately 1,087 individuals under the proposed project. Implementation would also result in the creation of approximately 260 employees, similar to the employment rate expected under the proposed project. Therefore, the potential population and housing increase associated with this alternative would be less than the growth anticipated as a result of implementing the proposed project. However, neither the project nor this alternative would result in population and/or housing growth in excess of the projected population growth for the Central City area and the City of Los Angeles. Consequently, this alternative is not considered environmentally superior with respect to population or housing growth as neither the proposed project nor this alternative would result in significant population or housing growth impacts.

Geology

Implementation of this alternative would result in the rehabilitation of the existing Broadway building and construction of mixed-use buildings on the Hill Street and 12th Street sites, as in the case of the proposed project. The buildings on the Hill Street and 12th Street sites would be reduced in height in comparison to those under the proposed project; however, construction and excavation activities associated with implementation of this alternative would be similar to those associated with implementing the proposed project. As detailed in **Section IV.C, Geology** of this EIR, the geology of each of the three project sites has been studied in detail, and implementation of this alternative would require implementation of the same mitigation measures outlined in **Section IV.C**. Therefore, due to the similarity between this alternative and the proposed project, and the fact that the same sites and soils would be disturbed by both this alternative and the proposed project, impacts to geology and soils would be comparable. Consequently, neither the proposed project nor this project alternative would result in significant geology impacts. As such, this alternative is not considered environmentally superior with respect to geology.

Water Resources

The project alternative would be smaller in scale than the proposed project yet place a similar demand on the stormwater drainage system. Under this alternative, the same amount of impermeable surfaces as the

proposed project would exist upon project build out, and both the proposed project and this project alternative would be subject to the requirements of the State Water Resources Control Board to obtain a NPDES permit. Consequently, neither the proposed project nor this project alternative would result in significant water resource impacts. As such, this alternative is not considered environmentally superior with respect to water resources.

Air Quality

Air quality impacts are evaluated in two categories: construction emissions and operational emissions. Construction-related emissions are associated with construction activities such as demolition, earthmoving, use of construction equipment and applying coatings to surfaces. Operational emissions are associated with (1) stationary sources such as the use of natural gas in building operations and landscape maintenance equipment; and (2) mobile sources associated with vehicle trips generated by the project. Implementation of this alternative would result in fewer emissions being generated than the proposed project. Under this alternative, the Broadway building would remain, and smaller scale buildings would be constructed on the Hill Street site in place of the Press building and on the 12th Street site in place of the existing surface parking lot. However, underground parking would still be provided beneath both the Hill Street and 12th Street buildings under this project alternative; therefore, during construction, earthmoving, excavation and construction activities would still occur on the Hill Street site. Under this alternative, approximately 193 fewer residents would be introduced to the site, thus, resulting in approximately 683 fewer daily vehicle trips. As such, overall construction and operational emissions would be less than those generated by the proposed project and thus would have the potential to avoid significant operational air quality impacts. For this reason, this alternative is considered environmentally superior with respect to air quality.

Transportation

A traffic analysis was prepared for the proposed project in which it analyzed the potential impacts to traffic and circulation as a result of the implementation of the proposed project. According to this traffic analysis, there is no potential for significant impacts associated with transportation and traffic for the proposed project. Under this alternative approximately 102 fewer residential units would be provided, thus, resulting in a decreased site population of approximately 193 fewer residents; as such, approximately 683 fewer daily vehicle trips would be generated by this alternative. Additionally, approximately 40 fewer AM peak hour trips and approximately 60 fewer PM peak hour trips would result daily, through the implementation of this project alternative. This alternative would impact the same intersections as the proposed project during the both the AM and PM peak hours. Therefore, this alternative would have less of an impact on future traffic and the level of service for intersections and

roadways in the project vicinity. However, since neither the proposed project nor this alternative would result in significant transportation impacts, this alternative is not considered environmentally superior with respect to transportation.

Hazards and Hazardous Materials

Potential hazards identified in the environmental site assessments, asbestos and lead surveys, and the methane survey for the proposed project documented existing conditions relative to the presence of hazards and hazardous materials on each of the three project sites. The results from each of these investigations are summarized in **Section IV.G, Hazards and Hazardous Materials**, of this EIR. Implementation of this alternative would require the same remediation of asbestos-containing materials and lead-based paint identified within the existing Broadway building and Press building. Under this alternative, the reuse of the Broadway building, the demolition of the Press building and construction of a replacement building, and the construction of a new mixed-use building on the 12th Street site would result in the presence of similar hazards and hazardous materials on each of the sites. As in the case of the proposed project, all potential impacts associated with hazards and hazardous materials can be reduced to less than significant levels with mitigation. Consequently, this alternative is not considered environmentally superior with respect to hazards and hazardous materials.

Noise

The amount of noise generated during construction and operation of a project can be related to the intensity of development as well as the nature and location of this development activity. Given the slightly reduced size of this alternative, construction activities under this alternative would occur over a slightly shorter period of time than that of the proposed project. However, distance between the noise source and surrounding noise sensitive land uses would remain unchanged. Therefore, this alternative would still result in short-term construction noise impacts. Operationally, use of the loading dock at the newly constructed Hill Street building would still result in the potential for interior noise levels inside the building to exceed 45 dB(A). Consequently, this alternative is not considered environmentally superior with respect to noise impacts as it would not avoid or substantially lessen the significant operational noise impacts identified for the proposed project.

Public Services

With regard to police and fire protection services, implementation of this alternative would result in a smaller population increase, as compared to the proposed project. Under the proposed project, approximately 1,087 individuals would occupy the 575 new condominium units. However, under this alternative, approximately 894 individuals would occupy the 473 new condominium units. Based on a

smaller resident population, it is expected that fewer calls for service would be generated by this alternative when compared to the proposed project. Demand on library, park and recreational services is also expected to be less due to a smaller population increase. Similarly, fewer students would be generated by this project alternative when compared to the proposed project, and therefore, less of a demand would be placed on the LAUSD schools. Thus, it is expected that this alternative would have less of an impact on the Los Angeles Police Department, Los Angeles Fire Department, the Los Angeles Public Library system, City of Los Angeles Parks and Recreation facilities, and LAUSD schools in comparison to the proposed project. However, as determined in **Section IV.I, Public Services** of this EIR, the proposed project would not result in significant impacts to public services. Consequently, this alternative is not considered environmentally superior with respect to public services, since neither the proposed project nor this project alternative would result in significant public services impacts.

Public Utilities

Impacts related to water, wastewater, solid waste, and energy under this alternative would likely be less than those generated by the proposed project. Given the reduced size of the alternative project, there would be approximately 193 fewer residents than the proposed project and the alternative project would result in less of a demand for utility services. However, as determined in **Section IV.J, Public Utilities** of this EIR, the proposed project would not result in significant impacts to public utilities. Consequently, this alternative is not considered environmentally superior with respect to public utilities, since neither the proposed project nor this alternative would result in significant public utilities impacts.

Visual Resources

Under this alternative, similar to the proposed project, the Broadway building would undergo rehabilitation, the Press building would be demolished, a new mixed-use building would be constructed on the Hill Street site, and a new mixed-use building would be constructed on the 12th Street site. Given the reduced FAR under this alternative, in comparison to the proposed project, the building heights on the Hill Street and 12th Street sites would be less than the heights of the buildings on these two sites upon build out of the proposed project. As a result, greater visibility of the surrounding downtown in the project area would be provided. However, as with the proposed project, this alternative would result in the construction of a building that potentially contrasts with the adjacent historic Broadway building, and as such would result in a significant unavoidable visual resource impact associated with the incompatibility between these two buildings. This alternative would result in a similar intensity of light sources as the project. The slightly reduced height of the buildings would slightly reduce shadows cast on surrounding uses when compared to the proposed project. As in the case of the proposed project, these light and glare impacts would be considered less than significant. Therefore, due to comparable

impacts associated with visual incompatibility between the new Hill Street building and the adjacent historic Broadway building, both the proposed project and this alternative would result in significant unavoidable visual resource impacts. Consequently, this alternative is not considered environmentally superior with respect to visual resources.

Cultural Resources

As discussed in **Section IV.L, Cultural Resources** of this EIR, construction of the proposed structure on the Hill Street site would be of a size, scale, proportion and mass that would alter the immediate surroundings of the historic Broadway building in a manner that reduces the historic significance of the Broadway building. The new construction adjacent to the Broadway building would affect the existing setting and spatial relationships of the Broadway building and the mass and height of the Hill Street building would have the potential to visually compete with and overwhelm the rehabilitated historic Broadway building and result in an indirect impact as a result of impairing the building's immediate surroundings. While mitigation would reduce this impact to the extent feasible, the impact cannot be reduced to a level that is less than significant due to the sheer height of the Hill Street building.

This alternative project is slightly smaller than the proposed project. The FAR for the proposed Hill Street project is 6.4 leaving only a difference in FAR of 0.4. The alternative proposed herein would be slightly smaller in size, scale, proportion, massing and height compared to that of the proposed project. Although the alternative project may be smaller when compared to that of the proposed project, the size, scale, proportion, massing and disparate height of the alternative project would still be considered incompatible when compared to that of the Broadway building and still has the potential to visually compete with and overwhelm the historic Broadway building as well as impair the building's immediate surroundings. Consequently, this alternative is not considered environmentally superior with respect to cultural resource impacts as it would not avoid or substantially lessen the significant cultural resource impacts identified for the proposed project.

Relation to Project Objectives

Rehabilitation and reuse of the Broadway building, and construction of mixed-use buildings with a FAR of 6:1 on the Hill Street and 12th Street sites would partially meet all project objectives, but to a lesser degree when compared to the proposed project. Under this alternative, approximately 102 fewer dwelling units would be developed, thus reducing the number of units available to individuals opting to live in the Downtown Los Angeles area. Therefore, under this alternative, the project objectives of providing housing, retail shopping, commercial uses and dining opportunities in the downtown area and

enhancing the property tax base for the Central Business District and City Center Redevelopment Project Areas would not be achieved to the same extent as with the proposed project.

Conclusion

As shown in **Table VI-7**, implementation of this alternative would avoid significant impacts to air quality as compared with the proposed project; however, this alternative would not avoid or change the significance of impacts associated with land use, population and housing, geology, water resources, transportation, hazards and hazardous materials, noise, public services, public utilities, visual resources or cultural resources as compared to the proposed project. Operational noise impacts, visual resource impacts and cultural resources impacts would remain significant and unavoidable under this alternative; significant air quality impacts would be avoided under this alternative; and all other environmental impacts would remain less than significant. As such, Alternative 4 avoids one significant environmental impact but only partially meets project objectives, in comparison with the proposed project.

While this project alternative does avoid significant impacts to air quality, as shown in **Table VI-6**, construction of this alternative would only result in a 14.2 percent net margin of profit upon build out, which is considered financially infeasible and as such the project would not be constructed. Therefore, this alternative limits the returns on the project investment such that the project would no longer be economically feasible for the applicant.

e. Alternative 5 – Residential in Broadway Building Alternative

Implementation of Alternative 5 would result in the rehabilitation of the Broadway building in conformance with the Secretary of the Interior's Standards for Rehabilitation, as proposed, but would include residential units as well as the proposed office and retail uses, and construction of new mixed-use buildings on the Hill Street and 12th Street sites. Distinguishing this alternative from the proposed project is the provision of 24 residential units within the rehabilitated Broadway building. As detailed in **Table VI-4**, Alternative 5 would include approximately 589 residential dwelling units, 37,600 square feet of retail space, 32,670 square feet of office space, 909 parking stalls, and a total program square footage of approximately 815,000 square feet.

Land Use

Development of this alternative would be done in accordance with existing provisions of the Central City Community Plan, the Central Business District Redevelopment Plan and the City Center Redevelopment Plan. However, like the proposed project, in order to comply with the City of Los Angeles Municipal Code 6:1 FAR requirement, this alternative would require the averaging of FAR among the Broadway,

Hill Street and 12th Street sites, or other discretionary approval. Additionally, this alternative would provide a slightly higher number of residential units, 589 instead of 575 condominiums, in comparison to the proposed project. Consequently, this alternative would conform to and achieve the same objectives as the proposed project outlining the provision for housing within the South Park neighborhood in the Central City Community Plan, Central Business District Redevelopment Plan and the City Center Redevelopment Plan. Therefore, the proposed project and Alternative 5 would be comparable and result in less than significant environmental impacts in terms of land use consistency. This alternative is not considered environmentally superior with respect to land use, as neither the proposed project nor this alternative would result in significant land use impacts.

Population and Housing

This alternative would provide a slightly higher number of residential units to the proposed project, approximately 589 in comparison to 575 units under the proposed project. Therefore, implementation of this project alternative would result in approximately 1,113 new residents introduced to the South Park neighborhood rather than 1,087 residents under the proposed project. This would result in an additional 26 individuals over the proposed project. Implementation would also result in the creation of approximately 225 employees, as opposed to 260 employees associated with the proposed project. Therefore, the potential population and housing growth associated with this alternative would be comparable to or slightly higher than the growth anticipated as a result of implementation of the proposed project. However, as discussed in **Section IV.B, Population and Housing**, growth projected with the proposed project would not exceed projected population or housing growth anticipated by the Southern California Association of Governments (SCAG). The additional 26 individuals associated with this project alternative also would not result in growth that is in excess of the projected population growth of the community. Consequently, this alternative is not considered environmentally superior with respect to population or housing growth as neither the proposed project nor this alternative would result in significant population or housing growth impacts.

Geology

Implementation of this alternative would result in the rehabilitation of the existing Broadway building and construction of mixed-use buildings on the Hill Street and 12th Street sites, as in the case of the proposed project. As detailed in **Section IV.C, Geology** of this EIR, the geology of each of the three project sites has been studied in detail, and implementation of this alternative would require implementation of the same mitigation measures outlined in **Section IV.C, Geology**. Therefore, due to the similarity between this alternative and the proposed project, and the fact that the same sites and soils would be disturbed by both this alternative and the proposed project, impacts to geology and soils would

be comparable. Consequently, neither the proposed project nor this project alternative would result in significant geology impacts. As such, this alternative is not considered environmentally superior with respect to geology.

Water Resources

Implementation of this project alternative would result in nearly identical construction and operational impacts and thus would place a similar demand on the stormwater drainage system when compared to the proposed project. The same amount of impermeable surfaces would exist upon project build out as compared to the proposed project, and both the proposed project and this project alternative would be subject to the requirements of the State Water Resources Control Board to obtain a NPDES permit. Consequently, neither the proposed project nor this project alternative would result in significant water resource impacts. As such, this alternative is not considered environmentally superior with respect to water resources.

Air Quality

Air quality impacts are evaluated in two categories: construction emissions and operational emissions. Construction-related emissions are associated with construction activities such as demolition, earthmoving, use of construction equipment, and applying coatings to surfaces. Operational emissions are associated with (1) stationary sources such as the use of natural gas in building operations and landscape maintenance equipment; and (2) mobile sources associated with vehicle trips generated by the project. Under this project alternative, the existing Broadway building would undergo rehabilitation in a manner consistent with that under the proposed project, and new multi-story buildings would be constructed on the Hill Street and 12th Street project sites. Due to comparable construction activities under this alternative, as well as the comparable number of residents that would be introduced to the project area through implementation of this project alternative, this alternative would generate a comparable amount of air quality emissions, both during construction and operationally. Similar to the proposed project, this alternative would involve rehabilitation of the Broadway building and construction of new mixed-use buildings on the Hill Street and 12th Street sites. As such, air quality impacts are expected to be comparable to those discussed in **Section IV.E, Air Quality**, of this EIR. Consequently, this alternative is not considered environmentally superior with respect to air quality impacts, as it would not avoid or substantially lessen the significant air quality impacts identified for the proposed project.

Transportation

A traffic analysis was prepared for the proposed project in which it analyzed the potential impacts to traffic and circulation as a result of the implementation of the proposed project. According to this traffic

analysis, there is no potential for significant impacts associated with transportation and traffic for the proposed project. Under this alternative approximately 17 additional residential units would be provided, yet under the proposed project more office and retail square footage would be provided than under this project alternative. According to the trip generations applied to the project in the traffic analysis, office and retail space generate more trips generations than residential condominiums. In this case the proposed project, which has more retail and office space, would have more of an impact on transportation and traffic by generating approximately 5,416 total daily vehicle trips when compared to the alternative project with more residential units; this alternative would generate approximately 5,319 total daily vehicle trips. Additionally, approximately 15 fewer AM peak hour trips and approximately 9 fewer PM peak hour trips would result, daily, through the implementation of this project alternative. This alternative would impact the same intersections as the proposed project during both the AM and PM peak hours. Therefore, this alternative would have slightly less of an impact on future traffic and the level of service for roadways and intersections in the project vicinity. However, since neither the proposed project nor this alternative would result in significant transportation impacts, this alternative is not considered environmentally superior with respect to transportation.

Hazards and Hazardous Materials

Potential hazards identified in the environmental site assessments, asbestos and lead surveys, and the methane survey for the proposed project documented existing conditions relative to the presence of hazards and hazardous materials on each of the three project sites. The results from each of these investigations are summarized in **Section IV.G, Hazards and Hazardous Materials**, of this EIR. Implementation of this alternative would require the same remediation of asbestos-containing materials and lead-based paint identified within the existing Broadway building and Press building. Under this alternative, the reuse of the Broadway building, the demolition of the Press building and construction of a replacement building, and the construction of a new mixed-use building on the 12th Street site would result in the presence of similar hazards and hazardous materials on each of the sites. As in the case of the proposed project, all potential impacts associated with hazards and hazardous materials can be reduced to less than significant levels with mitigation. Consequently, this alternative is not considered environmentally superior with respect to hazards and hazardous materials.

Noise

The amount of noise generated during construction and operation of a project can be related to the intensity of development as well as the nature and location of this development activity. Under this project alternative, the same construction activities associated with the proposed project would occur on each of the three project sites. Operationally, use of the loading dock at the newly constructed Hill Street

building would still result in the potential for interior noise levels inside the building to exceed 45 dB(A). Consequently, this alternative is not considered environmentally superior with respect to noise impacts as it would not avoid or substantially lessen the significant operational noise impacts identified for the proposed project.

Public Services

With regard to police and fire protection services, implementation of this alternative would result in a comparable population increase when compared to the proposed project. Based on a comparable number of residents, approximately 1,113 new residents and approximately 225 new employees generated by this alternative, it is expected that a comparable number calls for service would be generated by this alternative in comparison to the proposed project. Demand on library, park and recreational services is also expected to be comparable to that anticipated through build out of the proposed project due to a similar population increase. Similarly, a comparable number of students would be generated by this project alternative in comparison to the proposed project, and therefore, a similar demand would be placed on the LAUSD schools. Thus, it is expected that this alternative would have a comparable impact on the Los Angeles Police Department, Los Angeles Fire Department, the Los Angeles Public Library system, City of Los Angeles Parks and Recreation facilities, and LAUSD schools when compared to the proposed project. As determined in **Section IV.I, Public Services** of this EIR, the proposed project would not result in significant impacts to public services. Consequently, since impacts associated with this project alternative and the proposed project would be comparable, this alternative is not considered environmentally superior with respect to public services.

Public Utilities

Utility services include water demand, wastewater generation, solid waste generation and energy demand. According to the analysis included in **Section IV.J, Public Utilities** of this EIR, the proposed project would result in less than significant impacts to public utilities in Los Angeles area. Under this project alternative, approximately 225 fewer employees and a comparable number of residents, approximately 1,113 individuals, would be introduced to the three projects sites. As such, impacts associated with water demand, wastewater generation, solid waste generation and energy demand would be less than significant and comparable to those generated by the proposed project. Consequently, since impacts associated with this project alternative and the proposed project would be comparable, this alternative is not considered environmentally superior with respect to public utilities.

Visual Resources

Under this alternative, similar to the proposed project the Broadway building would undergo rehabilitation, the Press building would be demolished, a new mixed-use building would be constructed on the Hill Street site, and a new mixed-use building would be constructed on the 12th Street site. The building heights on the Hill Street and 12th Street sites would be identical to those under the proposed project; the only difference between this project alternative and the proposed project is that residential units would be included within the interior portion of the Broadway building. As a result, the proposed project and this project alternative would be visually identical, and impacts discussed in **Section IV.K, Visual Resources** of this EIR would also apply to this project alternative. As with the proposed project, this alternative would result in the construction of a building that contrasts with the adjacent historic Broadway building, and as such would result in a significant unavoidable impact associated with the incompatibility between these two buildings. This alternative would result in a similar intensity of light sources and shadows as the proposed project. As in the case of the proposed project, these light, glare and shadow impacts would be considered less than significant. Therefore, due to comparable impacts associated with visual incompatibility between the new Hill Street building and the adjacent historic Broadway building, both the proposed project and this alternative would result in significant unavoidable visual resource impacts. Consequently, this alternative is not considered environmentally superior with respect to visual resources.

Cultural Resources

As discussed in **Section IV.L, Cultural Resources** of this EIR, construction of the proposed structure on the Hill Street site would be of a size, scale, proportion and mass that would alter the immediate surroundings of the historic Broadway building in a manner that reduces the historic significance of the Broadway building. The new construction adjacent to the Broadway building would affect the existing setting and spatial relationships of the Broadway building and the mass and height of the Hill Street building would have the potential to visually compete with and overwhelm the rehabilitated historic Broadway building and result in an indirect impact as a result of impairing the building's immediate surroundings. While mitigation would reduce this impact to the extent feasible, the impact cannot be reduced to a level that is less than significant due to the sheer height of the Hill Street building. Consequently, this alternative is not considered environmentally superior with respect to cultural resource impacts as it would not avoid or substantially lessen the significant cultural resource impacts identified for the proposed project.

Relation to Project Objectives

Rehabilitation and reuse of the Broadway and construction of the mixed-use building on the 12th Street site would meet all of the project objectives. Under this alternative, a comparable number of dwelling units, approximately 589 new condominium units, would be developed, thus, providing a comparable number of units available to individuals opting to live in the Downtown Los Angeles area.

Conclusion

As shown in **Table VI-7**, implementation of this alternative would result in comparable impacts to all environmental issue areas; significant impacts would remain for air quality, visual resources, cultural resources and operational noise under this alternative, and all other impacts would be less than significant. As such, Alternative 5 does not avoid or lessen significant impacts associated with the proposed project. Additionally, as shown in **Table VI-6**, inclusion of the residential component in the Broadway building drops the net margin return on the Broadway building to -16.3 percent, due to the added expense of the adaptive reuse component required by the residential units, and the total net margin to 18.3 percent, which would render it financially infeasible. Therefore, Alternative 5 does not realize the necessary minimum financial return as compared to the proposed project.

f. Alternative 6 – Affordable Housing Alternative: 20–35 Percent Density Bonus Alternative

Implementation of Alternative 6 would result in the rehabilitation of the Broadway building in conformance with the Secretary of the Interior’s Standards for Rehabilitation and construction of new mixed-use buildings on the Hill Street and 12th Street sites. In accordance with SB 1818, a 20–35 percent density bonus would be granted to the 12th Street building in exchange for 5–11 percent of the residential dwelling units in the 12th Street building offered as affordable housing for individuals with a very low income. As such and as detailed in **Table VI-5**, Alternative 6 would provide between 383 and 430 residential dwelling units in the 12th Street building, of which approximately 19 to 47 would be considered affordable, and an additional 256 residential dwelling units in the Hill Street building, for a total of approximately 639 to 686 new condominium units; 39,610 square feet of retail space, 39,725 square feet of office space, and between 997 and 1,067 total parking stalls.

Land Use

Development of this alternative would be done in accordance with existing provisions of the Central City Community Plan, the Central Business District Redevelopment Plan, and the City of Los Angeles Municipal Code. Approval for the implementation of this project alternative would require site plan

review as well as the averaging or transfer of excess FAR from the Broadway site to both the Hill Street and 12th Street sites or other discretionary approval. And, unique to this alternative, in accordance with SB 1818, the project would be allowed a 20–35 percent density bonus increase where 20–35 percent more residential units would be provided in the proposed 12th Street building in exchange for 5–11 percent of those units offered as affordable for very low-income individuals. This alternative would provide approximately 64 to 111 more residential units than the proposed project and would provide a greater range of income options for condominium ownership. Consequently, this alternative would conform to and achieve more objectives than the proposed project outlining the provision for housing within the South Park neighborhood in the Central City Community Plan, Central Business District Redevelopment Plan and City Center Redevelopment Plan, and thus would result in land use impacts comparable to those of the proposed project. As such, this alternative is not considered environmentally superior with respect to land use, as neither the proposed project nor this alternative would result in significant land use impacts.

Population and Housing

This alternative would provide a total of between 639 and 686 residential units, approximately 64 to 111 more residential units than the proposed project; however, 5–11 percent of these additional residential units in the 12th Street building would be affordable to very low-income individuals. Therefore, the resulting potential population and housing increase of approximately 1,208 to 1,297 individuals associated with this alternative would be more than the growth anticipated as a result of the proposed project. This alternative would generate between 121 and 210 more residents than the proposed project. Implementation would also result in the creation of approximately 260 employees, which is comparable to the number employees associated with the proposed project. However, as discussed in **Section IV.B, Population and Housing**, growth projected with the proposed project would not exceed projected population or housing growth anticipated by SCAG. The additional 121 to 210 individuals associated with this project alternative also would not result in growth that is in excess of SCAG's projected population growth of the community. Consequently, this alternative is not considered environmentally superior with respect to population or housing growth as neither the proposed project nor this alternative would result in significant population or housing growth impacts.

Geology

Implementation of this alternative would result in the rehabilitation of the existing Broadway building and construction of mixed-use buildings on the Hill Street and 12th Street sites, as in the case of the proposed project. As detailed in **Section IV.C** of this EIR, the geology of each of the three project sites has been studied in detail, and implementation of this alternative would require implementation of the

same mitigation measures outlined in **Section IV.C, Geology**. Therefore, due to the similarity between this alternative and the proposed project, and the fact that the same sites and soils would be disturbed by both this alternative and the proposed project, impacts to geology and soils would be comparable and less than significant with mitigation. Consequently, neither the proposed project nor this project alternative would result in significant geology impacts. As such, this alternative is not considered environmentally superior with respect to geology.

Water Resources

Implementation of this project alternative would result in the construction of a project slightly larger in scale than the proposed project. The Broadway building and Hill Street building uses would be identical to those anticipated in the proposed project; however, new construction on the 12th Street site would be more developed and dense. However, despite the increased population density on the 12th Street site, under this project alternative, the same amount of impermeable surfaces as the proposed project would apply to the each of the three sites, and both the proposed project and this project alternative would be subject to the requirements of the State Water Resources Control Board to obtain a NPDES permit. Consequently, neither the proposed project nor this project alternative would result in significant water resource impacts. As such, this alternative is not considered environmentally superior with respect to water resources.

Air Quality

Air quality impacts are evaluated in two categories: construction emissions and operational emissions. Construction-related emissions are associated with construction activities such as demolition, earthmoving, use of construction equipment, and applying coatings to surfaces. Operational emissions are associated with (1) stationary sources such as the use of natural gas in building operations and landscape maintenance equipment; and (2) mobile sources associated with vehicle trips generated by the project. This project alternative would likely generate a comparable amount of air quality emissions during construction and slightly more emissions operationally, due to the population increase on the 12th Street site. Similar to the proposed project, this alternative would involve rehabilitation of the Broadway building and construction of new mixed-use buildings on the Hill Street and 12th Street sites. As such, air quality impacts during construction are expected to be comparable to those discussed in **Section IV.E, Air Quality** of this EIR. However, during project operations, more emissions would likely be generated due to the projected increase in daily vehicle trips. This alternative would add 20–35 percent more residential units to the 12th Street site, result in a population increase of between 121 and 210 more individuals than the proposed project, and thus result in a total of between 5,960 and 6,395 daily vehicle trips, a total of 544 to 979 more trips than anticipated under the proposed project. As such, the additional

544 to 979 daily vehicle trips would result in an increase in mobile source air emissions. Consequently, this alternative is not considered environmentally superior with respect to air quality impacts as it would not avoid or substantially lessen the significant air quality impacts identified for the proposed project.

Transportation

A traffic analysis was prepared for the proposed project in which it analyzed the potential impacts to traffic and circulation as a result of the implementation of the proposed project. According to this traffic analysis, there is no potential for significant impacts associated with transportation and traffic for the proposed project. Under this alternative 20–35 percent more residential units would be provided than under the proposed project, resulting in an increase of 64 to 111 more residential units in comparison to the proposed project; the amount of office and retail square footage would remain the same. As such, the increased number of residents, between 121 and 210 more individuals, associated with the project would result in an increase in traffic generated by the proposed project. Under this project alternative, between 5,960 and 6,395 total daily vehicle trips would be generated, which represents an increase of between 544 and 979 total trips over the proposed project. Additionally, this alternative would generate between 39 and 70 more AM peak hour trips and between 49 and 85 additional PM peak hour trips over those anticipated under the proposed project. This alternative would impact the same intersections as the proposed project during both the AM and PM peak hours. Due to the projected increase in trips generated by this project alternative, this alternative would have a greater impact on future traffic and the level of service for roadways and intersections in the project vicinity. This increase, however, is not expected to result in a potentially significant traffic impact, as adequate capacity at intersections and on the roadways in the vicinity of the project exists to accommodate these additional vehicle trips. Consequently, this alternative is not considered environmentally superior with respect to transportation, as neither would result in significant traffic impacts.

Hazards and Hazardous Materials

Potential hazards identified in the environmental site assessments, asbestos and lead surveys, and the methane survey for the proposed project documented existing conditions relative to the presence of hazards and hazardous materials on each of the three project sites. The results from each of these investigations are summarized in **Section IV.G, Hazards and Hazardous Materials** of this EIR. Implementation of this alternative would require the same remediation of asbestos-containing materials and lead-based paint identified within the existing Broadway building and Press building. Under this alternative, the reuse of the Broadway building, the demolition of the Press building and construction of a replacement building, and the construction of a new mixed-use building on the 12th Street site would result in the presence of similar of hazards and hazardous materials on each of the sites. As in the case of

the proposed project, all potential impacts associated with hazards and hazardous materials can be reduced to less than significant levels with mitigation. Consequently, this alternative is not considered environmentally superior with respect to hazards and hazardous materials.

Noise

The amount of noise generated during construction and operation of a project can be related to the intensity of development as well as the nature and location of this development activity. Under this project alternative, the same construction activities associated with the proposed project would occur on each of the three project sites. Operationally, use of the loading dock at the newly constructed Hill Street building would still result in the potential for interior noise levels inside the building to exceed 45 dB(A). Consequently, this alternative is not considered environmentally superior with respect to noise impacts as it would not avoid or substantially lessen the significant operational noise impacts identified for the proposed project.

Public Services

With regard to police and fire protection services, implementation of this alternative would result in a greater population increase when compared to the proposed project. Implementation of this project alternative would result in the construction of between 639 and 686 residential units, resulting in the introduction of approximately 1,208 to 1,297 new residents to the project area. This would represent a population increase of between 121 and 210 individuals over that anticipated under the proposed project. Based on a higher number of residents generated by this alternative, an increase in calls for service upon implementation of this alternative is expected in comparison to the proposed project. Demand on library, park and recreational services is also expected to result in a slight increase when compared to the proposed project due to a slight population increase. Similarly, a greater number of students would be generated by this project alternative in comparison to the proposed project, and would therefore result in an increased demand on LAUSD schools. Thus, it is expected that this alternative would have a greater impact on the Los Angeles Police Department, Los Angeles Fire Department, the Los Angeles Public Library system, City of Los Angeles Parks and Recreation facilities, and LAUSD schools when compared to the proposed project. It has been determined in **Section IV.I, Public Services** of this EIR, that the proposed project would result in less than significant impacts on public services; therefore, implementation of this alternative would likely also result in less than significant impacts on public services. However, impacts associated with the proposed project would be less significant than those associated with this alternative. Consequently, this alternative is not considered environmentally superior with respect to public services.

Public Utilities

Utility services include water demand, wastewater generation, solid waste generation, and energy demand. According to the analysis included in **Section IV.J, Public Utilities** of this EIR, the proposed project would result in less than significant impacts to public utilities in Los Angeles area. Under this project alternative, the number of residential dwelling units in the Hill Street and 12th Street buildings would be increased by 20–35 percent, resulting in the provision of between 64 and 111 additional residential units over the proposed project, and as such an increase in the number of residents introduced to two of the projects sites. Under this project alternative, approximately 121 to 210 additional residents would be generated. As such, impacts associated with water demand, wastewater generation, solid waste generation, and energy demand would increase in comparison to those generated by the proposed project. Consequently, this alternative is not considered environmentally superior with respect to public utilities.

Visual Resources

Under this alternative, similar to the proposed project the Broadway building would undergo rehabilitation, the Press building would be demolished, a new mixed-use building would be constructed on the Hill Street site, and a new mixed-use building would be constructed on the 12th Street site. The building height on the Hill Street building would be comparable to that for the proposed project; however, for the 12th Street site, the building would be between 43 and 48 stories tall in order to accommodate the additional 64 to 111 increase in the number of residential units. As a result, the proposed project and this project alternative would be visually similar to one another, and impacts discussed in **Section IV.K, Visual Resources** of this EIR would also apply to this project alternative. As with the proposed project, this alternative would result in the construction of a building that has the potential to contrast with the adjacent historic Broadway building and, as such, would result in a significant unavoidable visual resource impact associated with the incompatibility between these two buildings. This alternative would result in a similar intensity of light sources and shadows as the proposed project. As in the case of the proposed project, these light, glare and shadow impacts would be considered less than significant. Therefore, due to comparable impacts associated with visual incompatibility between the new Hill Street building and the adjacent historic Broadway building, both the proposed project and this alternative would result in significant unavoidable impacts to visual resources. Consequently, this alternative is not considered environmentally superior with respect to visual resources as it would not avoid or significantly lessen the significant visual resources impact identified for the proposed project.

Cultural Resources

As discussed in **Section IV.L, Cultural Resources** of this EIR, construction of the proposed structure on the Hill Street site would be of a size, scale, proportion and mass that would alter the immediate surroundings of the historic Broadway building in a manner that reduces the historic significance of the Broadway building. The new construction adjacent to the Broadway building would affect the existing setting and spatial relationships of the Broadway building and the mass and height of the Hill Street building would have the potential to visually compete with and overwhelm the rehabilitated historic Broadway building and result in an indirect impact as a result of impairing the building's immediate surroundings. While mitigation would reduce this impact to the extent feasible, the impact cannot be reduced to a level that is less than significant due to the sheer height of the Hill Street building. Similar to the proposed project, this alternative would involve the construction of a 23-story mixed-use building adjacent to the historic Broadway building. As such, this alternative would result in the construction of a new building that would visually compete with and overwhelm the historic Broadway building as well as impair the building's immediate surroundings; thus, this alternative would result in a significant and unavoidable impact even after implementation of mitigation. Consequently, this alternative is not considered environmentally superior with respect to cultural resource impacts as it would not avoid or substantially lessen the significant cultural resource impact identified for the proposed project.

Relation to Project Objectives

Construction of the 20–35 percent density bonus affordable housing alternative would partially meet most of the project objectives. However, this alternative would not achieve the objective of constructing a privately financed project without the need for public subsidy. Under this alternative, 20–35 percent more dwelling units would be developed in the 12th Street building, with 5–11 percent of all those units set aside as very low-income affordable housing, thus, providing not only upscale housing, but a variety of housing types for mixed income groups in the Downtown Los Angeles area.

Conclusion

As shown in **Table VI-7**, implementation of this alternative would result in comparable impacts to all environmental issue areas; significant impacts would remain for air quality, visual resources, cultural resources and operational noise under this alternative, and all other impacts would be less than significant. As such, Alternative 6 does not avoid or lessen significant impacts associated with the proposed project. Additionally, as shown in **Table VI-6**, the provision of additional units, offered as affordable housing for low- and very-low-income individuals, drops the net margin return on the project to at least 16.1 percent, which would render this alternative infeasible; thus, this alternative would not be

constructed without substantial public subsidy. Therefore, Alternative 6 does not realize the same financial return as the proposed project.

7. IDENTIFICATION OF THE ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Section 15126.6(e)(2) of the *CEQA Guidelines* indicates that an analysis of alternatives to the proposed project shall identify one alternative as the environmentally superior alternative. Furthermore, if the environmentally superior alternative is the No Project Alternative, the EIR shall also identify an environmentally superior alternative from among the other alternatives. However, under the No Project Alternative, rehabilitation of the historic Broadway building would not occur, and the building would be allowed to continually deteriorate over time.

Of the remaining alternatives, implementation of Alternative 2 – Adaptive Reuse of the Press Building Alternative, would result in less environmental impacts than the proposed project. From an environmental perspective, this alternative is superior to the proposed project as it reduces the level of impacts associated with the proposed project, and in particular would reduce significant unavoidable adverse impacts to air quality, visual resources and cultural resources.

However, as previously indicated, this alternative would not provide housing to the same extent as the proposed project, and thus, would only partially achieve project objectives associated with providing much needed housing in an underutilized urban area of Downtown Los Angeles. Moreover, this project alternative would not create returns on project investment that would justify the cost of the rehabilitation of the historic Herald Examiner building and the public benefit that comes with it. By providing 575 for-sale condominium units collectively on the Hill Street and 12th Street sites, the project applicant is financially able to rehabilitate the Broadway building in conformance with the Secretary of the Interior's Standards for Rehabilitation. Therefore, while this project alternative is considered environmentally superior, it does not fully meet all of the project objectives nor is it financially feasible to implement.