

V. ALTERNATIVES

A. INTRODUCTION

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

- The discussion of alternatives shall focus on alternatives to the project including alternative locations that are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.
- The No Project Alternative shall be evaluated along with its potential impacts. The No Project Alternative analysis shall discuss the existing conditions at the time the notice of preparation is published, as well as what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.
- The range of alternatives required in an EIR is governed by a "rule of reason." Therefore, the EIR must evaluate only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the proposed project.
- For alternative locations, only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR.
- An EIR need not consider an alternative whose effects cannot be reasonably ascertained and whose implementation is remote and speculative.

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

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

¹CEQA Guidelines, California Code of Regulations (CCR), Title 14, Division 6, Chapter 3, § 15126.6.

²*Ibid.*

³CEQA Guidelines, CCR, Title 14, Division 6, Chapter 3, §15126.6(f)(3).

⁴CEQA Guidelines, CCR, Title 14, Division 6, Chapter 3, §15126.6(c).

B. PROJECT-LEVEL IMPACTS

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

- **Aesthetics (Shade and Shadow)** – During the Winter Solstice, shadows generated from the implementation of the proposed project would impact the single-family residences on 97th Street, north of the Specific Plan area, for a period of more than three hours.
- **Air Quality (Construction, Operational, and Greenhouse Gas [GHG] Emissions)** – During construction, NO_x and PM₁₀ regional emissions, as well as PM_{2.5} and PM₁₀ local concentrations, would exceed regional and local significance thresholds. Operational emissions would also exceed regional significance thresholds for VOC, NO_x, CO, and PM₁₀. Similarly, GHG emissions would exceed the 4.6 metric tons of CO₂e per year per service population significance threshold.
- **Noise (Construction)** – Construction noise levels would exceed the 5-dBA significance threshold at multiple sensitive receptors during all phases of construction.
- **Traffic and Transportation** – The following intersection levels of service would be significantly impacted:
 - Alameda Street and Firestone Boulevard (PM Peak Hour)
 - Alameda Street and Century Boulevard/Martin Luther King Jr. Boulevard (AM and PM Peak Hours)
 - Central Avenue and Century Boulevard (AM and PM Peak Hours)
 - Long Beach Boulevard and Tweedy Boulevard (AM and PM Peak Hours),

Although there have been potential physical mitigation measures identified, the right-of-way limitations at these intersections do not permit their implementation, and therefore, no feasible mitigation measures have been identified to mitigate impacts at these intersections.

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

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

Specific Plan Objectives

- Determine the appropriate location and intensity of development, mix of land uses, and building heights to be constructed in the Specific Plan area;
- Guide the character of the land planning to ensure that high-quality, place making improvements are made to create a safe and inviting, pedestrian-oriented, regional retail destination not currently available in the area;
- Establish public and private sector implementation measures and responsibilities that adequately address both local and regional impacts;
- Create a green, sustainable, vibrant urban village;
- Attract neighbors with mixed income and ethnicities;
- Provide convenient access to transit corridors;
- Supply quality affordable housing;
- Enhance educational opportunities;
- Provide access to jobs and supportive services;
- Offer intergenerational housing;
- Develop affordable multi-family rentals;
- Provide a safe pedestrian friendly environment;

- Create active and passive open spaces; and
- Define the future locations and dimensions of streets, rights-of-ways or other access ways.

Annexation Objectives

- Provide land use controls to ensure compatibility of all land uses in the Specific Plan area;
- Create a logical boundary between the cities of Los Angeles, South Gate, and Lynwood; and
- Reduce the cost of providing services to the area.

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

C. ALTERNATIVES TO THE PROPOSED PROJECT

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

Alternatives should be selected on the basis of their ability to attain all or most of the basic objectives of the project while reducing the project’s significant environmental effects. The CEQA Guidelines state that “...[t]he EIR should briefly describe the rationale for selecting alternatives to be discussed [and]...shall include sufficient information to allow meaningful evaluation, analysis and comparison with the proposed project.”⁷ The feasibility of the alternatives is another consideration in the selection of alternatives. The CEQA Guidelines state that “[a]mong the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations [and] jurisdictional boundaries...”⁸ “The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making.”⁹ Alternatives that are considered remote or speculative, or whose effects cannot be reasonably predicted do not require consideration. Therefore, feasibility, the potential to mitigate significant project-related impacts, and reasonably informing the decision-maker are the primary considerations in the selection and evaluation of alternatives.

⁵Section 15126.6(f).

⁶Section 15126.6(e) and Section 15126(f)(2).

⁷Section 15126.6(e) and Section 15126(f).

⁸Section 15126.6(f)(1).

⁹Section 15126.6(f).

Alternative 1 – No Project Alternative. The No Project Alternative is required by Section 15126.6 (e)(2) of the CEQA Guidelines and assumes that the proposed project would not be implemented. The No Project Alternative allows decision-makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project. However, “no project” does not mean that development on the project site will be prohibited. The No Project Alternative includes “what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services” (CEQA Section 15126.6 [e][2]).

Although development within the Specific Plan area could occur based on current plans, no development is reasonably expected as there is no incentive to redevelop the existing public housing complex or the vacant and blighted industrial properties, and the existing zoning limits the ability to increase the density. Section 15126.6(e)(3)(B) of the CEQA Guidelines states that, “in certain instances, the no project alternative means ‘no build’ wherein the existing environmental setting is maintained.” Accordingly, for the purposes of this analysis, the No Project Alternative assumes that no new development would occur within the Specific Plan area, and that physical conditions of the project site would remain as they are today. No new buildings would be constructed, and no existing buildings would be removed. Similarly the adoption of the Specific Plan would not occur and the annexation of land from unincorporated Los Angeles County to the City of Los Angeles would not occur under the No Project Alternative.

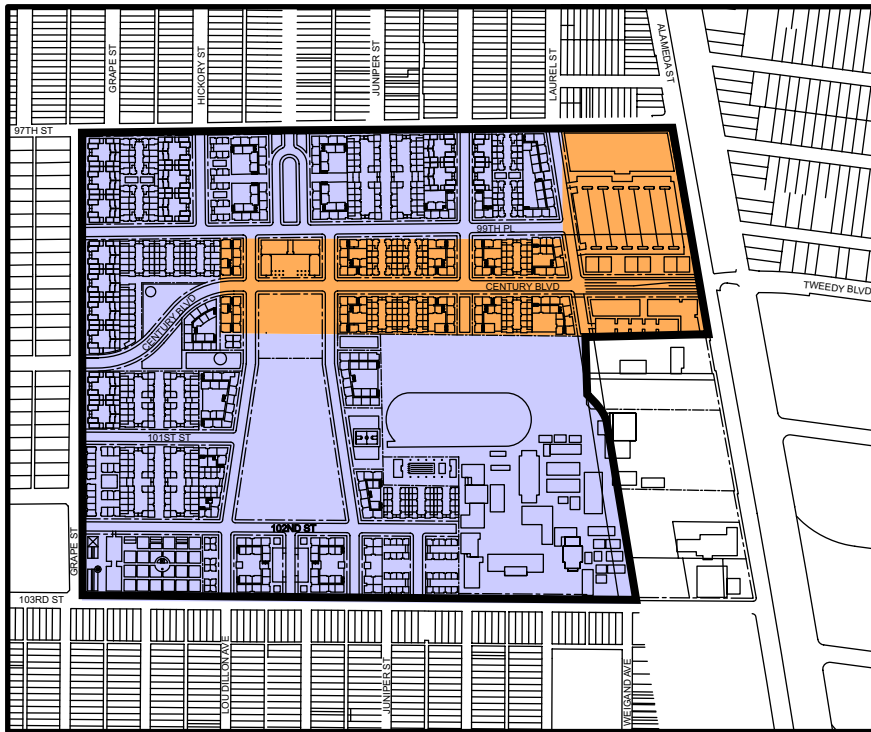
Alternative 2 – Reduced Annexation Area Alternative. The Reduced Annexation Area Alternative (Alternative 2) would annex the HACLA-owned 21-acre property adjacent to the Jordan Downs public housing complex but not the 20-acre privately-owned properties, the public rights-of-way along Alameda Street, or the LAUSD-owned property fronting Alameda Street (**Figure V-1**). Consequently, these properties would not be included within the Specific Plan. Alternative 2 would result in the development of the same number of residential units (up to 1,800 units), and the same amounts of community facilities (70,000 square feet), of new school facilities (a 650-student elementary school and a 750-student high school expansion), and of open space (8.95 acres) as the proposed project. The primary difference between Alternative 2 and the proposed project is that Alternative 2 would result in less commercial development than the proposed project. Specifically, 230,000 square feet of commercial/retail uses would be developed under Alternative 2, as opposed to the 522,000 square feet under the proposed project.

Alternative 3 – Reduced Height Alternative. The Reduced Height Alternative (Alternative 3) would reduce the height of the buildings along 97th Street from 60 feet to 30 feet, and would relocate the 60-foot-tall buildings along 97th Street within the interior of the Specific Plan area such that shadows generated from within the Specific Plan area would not impact residences on 97th Street for a period of more than three hours (**Figure V-2**). Similar to the proposed project, Alternative 3 would result in the development of the same number of residential units (up to 1,800 units), and the same amounts of commercial, retail and light industrial space (up to 522,000 square feet), of community facilities (70,000 square feet), of new school facilities (a 650-student elementary school and a 750-student high school expansion), and of open space (8.95 acres).

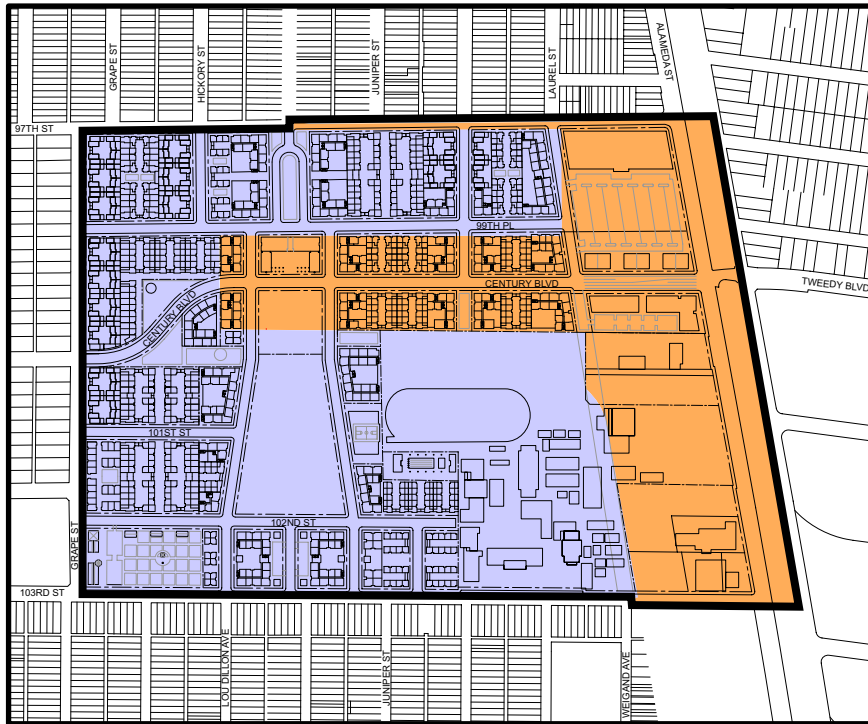
Alternative 4 –Industrial Zone Alternative. The Industrial Zone Alternative (Alternative 4) would be similar to the proposed project with the exception that the privately-owned parcels along Alameda Street would be zoned M2 (Light Industrial) upon annexation to the City of Los Angeles (**Figure V-3**). The M2 zoning designation would allow the existing industrial uses to continue operating without becoming a legal non-conforming use. Under Alternative 4 commercial uses would not be developed on these properties. However, the same amount of residential and community facilities as the proposed project would be developed under Alternative 4.

The summary comparison of impacts of the project alternatives and the proposed project is included in **Table V-1**.




REDUCED ANNEXATION AREA ALTERNATIVE



PROPOSED PROJECT



LEGEND:

-  Specific Plan Area
-  City of Los Angeles Portion
-  Annexation Area

SOURCE: TAHA, 2010.

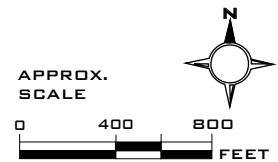
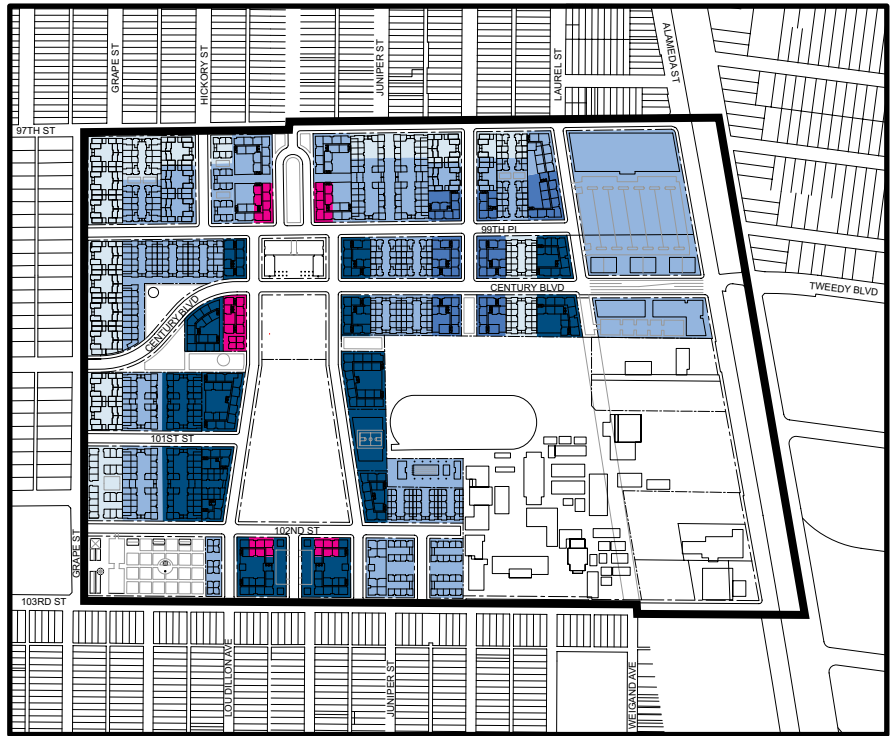
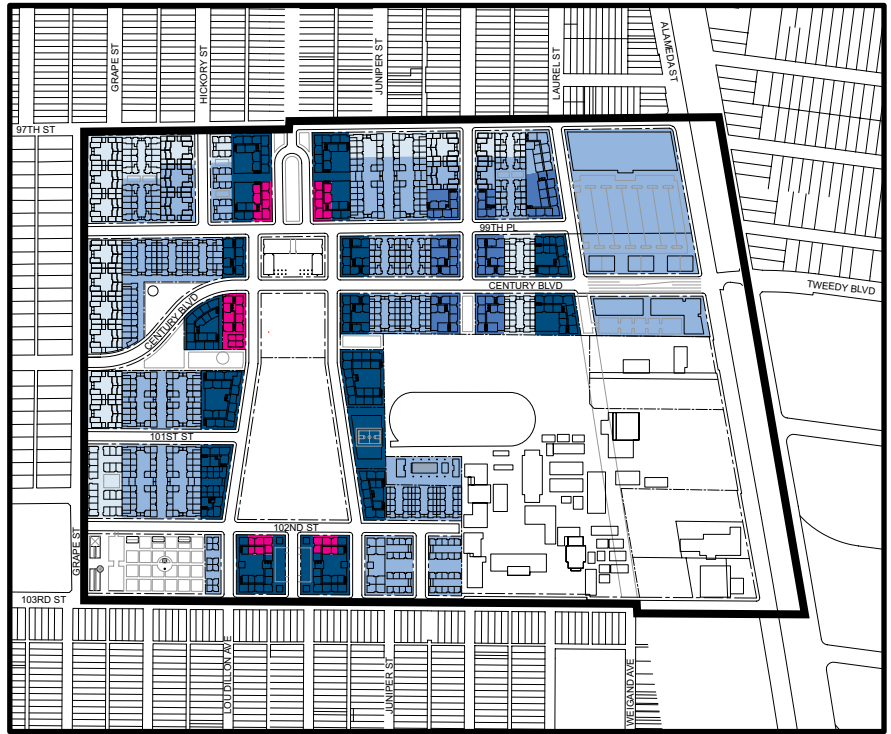


FIGURE V-1


REDUCED HEIGHT ALTERNATIVE



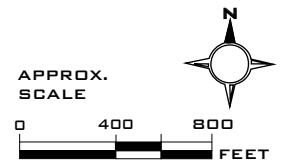
PROPOSED PROJECT



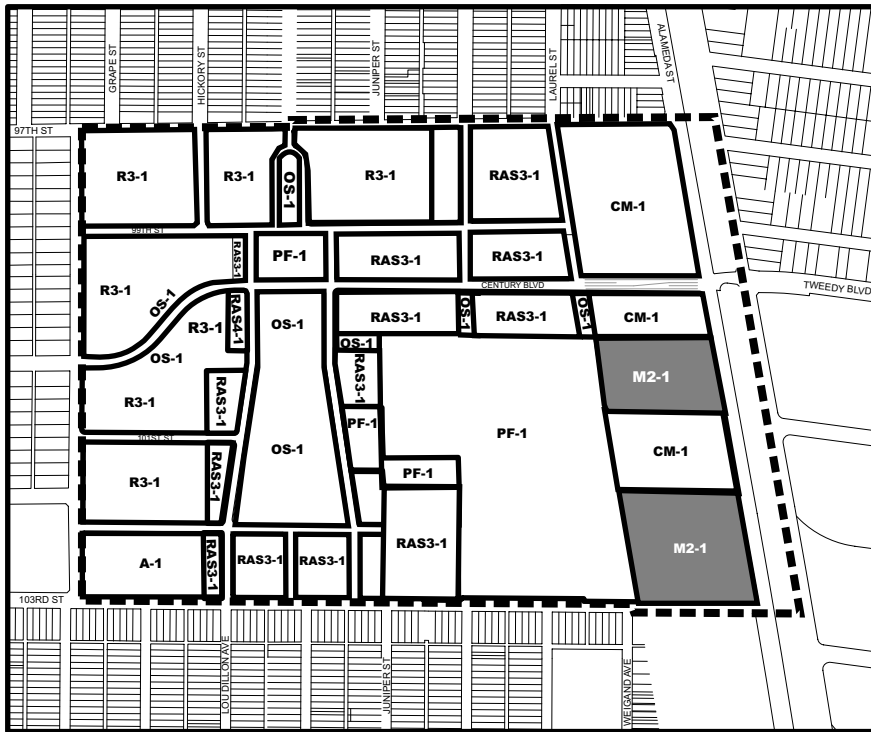
LEGEND:

- | | | | |
|--|-----------------------------------|---|---|
|  | Specific Plan Area |  | Up to 50 Feet, 3-4 Stories |
|  | 25 to 35 Feet, Mix of 2-3 Stories |  | Up to 60 Feet, 3-5 Stories |
|  | Up to 35 Feet, up to 3 Stories |  | Up to 90 Feet - Potential Mid-Rise Locations, up to 8 Stories |

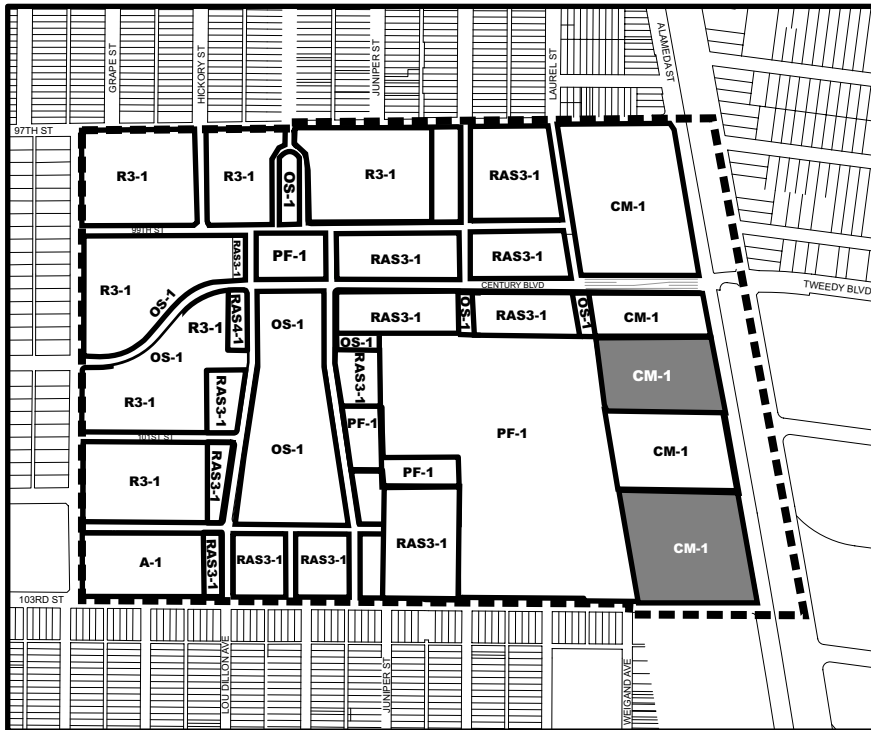
SOURCE: WRT/Soloman E.T.C., 2010.



INDUSTRIAL ZONE ALTERNATIVE



PROPOSED PROJECT



LEGEND:

- Specific Plan Area
- Privately-Owned Parcels

SOURCE: TAHA, 2010.

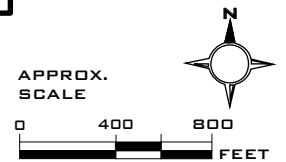


TABLE V-1: COMPARISON OF ALTERNATIVES					
Environmental Issue	Project Impact	Alternative 1 No Project Alternative	Alternative 2 Reduced Annexation Area Alternative	Alternative 3 Reduced Height Alternative	Alternative 4 Industrial Zone Alternative
A. AESTHETICS					
Visual Character	Less Than Significant With Mitigation	Greater (Unavoidable Significant)	Greater (Unavoidable Significant)	Similar (Less Than Significant With Mitigation)	Greater (Unavoidable Significant)
Views and Vistas	Less Than Significant	Similar (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Scenic Resources	Less Than Significant	Similar (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Shade & Shadows	Unavoidable Significant	Less (Project Impact Avoided)	Similar (Unavoidable Significant)	Less (Project Impact Avoided)	Similar (Unavoidable Significant)
Light & Glare	Less Than Significant With Mitigation	Less (No Impact)	Similar (Less Than Significant With Mitigation)	Similar (Less Than Significant With Mitigation)	Similar (Less Than Significant With Mitigation)
B. AGRICULTURAL RESOURCES					
Agricultural Resources	No Impact	Similar (No Impact)	Similar (No Impact)	Similar (No Impact)	Similar (No Impact)
C. AIR QUALITY					
Construction Emissions	Unavoidable Significant	Less (Project Impact Avoided)	Less, But Remain Unavoidable Significant	Similar (Unavoidable Significant)	Less, But Remain Unavoidable Significant
Operational Emissions	Unavoidable Significant	Less (Project Impact Avoided)	Less, But Remain Unavoidable Significant	Similar (Unavoidable Significant)	Less, But Remain Unavoidable Significant
Global Climate Change	Unavoidable Significant	Less (Project Impact Avoided)	Less, But Remain Unavoidable Significant	Similar (Unavoidable Significant)	Less, But Remain Unavoidable Significant
D. BIOLOGICAL RESOURCES					
Biological Resources	Less Than Significant With Mitigation	Less (No Impact)	Similar (Less Than Significant With Mitigation)	Similar (Less Than Significant With Mitigation)	Similar (Less Than Significant With Mitigation)
E. CULTURAL RESOURCES					
Historic Resources	Less Than Significant With Mitigation	Less (No Impact)	Similar (Less Than Significant With Mitigation)	Similar (Less Than Significant With Mitigation)	Similar (Less Than Significant With Mitigation)
Archeological Resources	Less Than Significant With Mitigation	Less (No Impact)	Similar (Less Than Significant With Mitigation)	Similar (Less Than Significant With Mitigation)	Similar (Less Than Significant With Mitigation)
Paleontological Resources	Less Than Significant With Mitigation	Less (No Impact)	Similar (Less Than Significant With Mitigation)	Similar (Less Than Significant With Mitigation)	Similar (Less Than Significant With Mitigation)

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F. ENERGY					
Petroleum	Less Than Significant	Less (No Impact)	Less (Less than Significant)	Similar (Less Than Significant)	Less (Less than Significant)
Electricity	Less Than Significant With Mitigation	Less (No Impact)	Less (Less Than Significant With Mitigation)	Similar (Less Than Significant With Mitigation)	Less (Less Than Significant With Mitigation)
Natural Gas	Less Than Significant With Mitigation	Less (No Impact)	Less (Less Than Significant With Mitigation)	Similar (Less Than Significant With Mitigation)	Less (Less Than Significant With Mitigation)
G. GEOLOGY & SOILS					
Seismicity	Less Than Significant With Mitigation	Less (No Impact)	Similar (Less Than Significant With Mitigation)	Similar (Less Than Significant With Mitigation)	Similar (Less Than Significant With Mitigation)
Excavation and Development	Less Than Significant With Mitigation	Less (No Impact)	Similar (Less Than Significant With Mitigation)	Similar (Less Than Significant With Mitigation)	Similar (Less Than Significant With Mitigation)
H. HAZARDS & HAZARDOUS MATERIALS					
Hazards Hazardous Materials	Less Than Significant With Mitigation	Greater (Unavoidable Significant)	Greater (Unavoidable Significant)	Similar (Less Than Significant With Mitigation)	Greater (Unavoidable Significant)
Hazardous Wastes and Contamination.	Less Than Significant With Mitigation	Less (No Impact)	Greater (Unavoidable Significant)	Similar (Less Than Significant With Mitigation)	Greater (Unavoidable Significant)
I. HYDROLOGY & WATER QUALITY					
Surface Water Quality	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Groundwater	Less Than Significant	Greater (Unavoidable Significant)	Greater (Unavoidable Significant)	Similar (Less Than Significant)	Greater (Unavoidable Significant)
Drainage and Flooding	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
J. LAND USE & PLANNING					
Division of Established Community	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Land Use Compatibility	Less Than Significant	Less (No Impact)	Greater (Unavoidable Significant)	Similar (Less Than Significant With Mitigation)	Greater (Unavoidable Significant)
K. MINERAL RESOURCES					
Mineral Resources	No Impact	Similar (No Impact)	Similar (No Impact)	Similar (No Impact)	Similar (No Impact)

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L. NOISE & VIBRATION					
Construction Noise	Unavoidable Significant	Less (Project Impact Avoided)	Similar (Unavoidable Significant)	Similar (Unavoidable Significant)	Similar (Unavoidable Significant)
Construction Vibration	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Operational Noise	Less Than Significant With Mitigation	Less (No Impact)	Greater (Unavoidable Significant)	Similar (Less Than Significant With Mitigation)	Greater (Unavoidable Significant)
Operational Vibration	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
M. POPULATION, HOUSING & EMPLOYMENT					
Population	Less Than Significant With Mitigation	Less (No Impact)	Similar (Less Than Significant With Mitigation)	Similar (Less Than Significant With Mitigation)	Similar (Less Than Significant With Mitigation)
Housing	Less Than Significant With Mitigation	Less (No Impact)	Similar (Less Than Significant With Mitigation)	Similar (Less Than Significant With Mitigation)	Similar (Less Than Significant With Mitigation)
Employment	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
N. PUBLIC SERVICES					
Fire Protection & Emergency Services	Less-Than-Significant with Mitigation	Less (Project Impact Avoided)	Similar (Less Than Significant With Mitigation)	Similar (Less Than Significant With Mitigation)	Similar (Less Than Significant With Mitigation)
Police	Less Than Significant With Mitigation	Less (Project Impact Avoided)	Similar (Less Than Significant With Mitigation)	Similar (Less-Than-Significant with Mitigation)	Similar (Less Than Significant With Mitigation)
Public Schools	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Libraries	Less Than Significant With Mitigation	Less (Project Impact Avoided)	Similar (Less Than Significant With Mitigation)	Similar (Less-Than-Significant with Mitigation)	Similar (Less Than Significant With Mitigation)
O. RECREATION					
Recreation	Less Than Significant	Greater (Unavoidable Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)

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Environmental Issue	Project Impact	Alternative 1 No Project Alternative	Alternative 2 Reduced Annexation Area Alternative	Alternative 3 Reduced Height Alternative	Alternative 4 Industrial Zone Alternative
P. TRAFFIC & TRANSPORTATION					
Intersection Analysis	Unavoidable Significant	Less (Project Impact Avoided)	Less (Less Than Significant)	Similar (Unavoidable Significant)	Less (Less Than Significant)
Congestion Management Program	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Neighborhood Intrusion, Project Access, Bicycle, Pedestrian and Vehicular Safety, Transit System Capacity, Parking, In-Street Construction Traffic	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Q. UTILITIES & SERVICE SYSTEMS					
Storm Water and Drainage	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Wastewater	Less Than Significant With Mitigation	Less (No Impact)	Less (Less Than Significant With Mitigation)	Similar (Less Than Significant With Mitigation)	Less (Less Than Significant With Mitigation)
Water	Less Than Significant With Mitigation	Less (No Impact)	Less (Less Than Significant With Mitigation)	Similar (Less Than Significant With Mitigation)	Less (Less Than Significant With Mitigation)
Solid waste	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)	Less (Less Than Significant)
SOURCE: TAHA, 2010					

D. ANALYSIS OF ALTERNATIVE 1 – NO PROJECT ALTERNATIVE

Aesthetics

Under the No Project Alternative, there are no construction activities or proposed structures that would modify the existing visual character, affect lighting and glare or shade and shadows. There are no views and vistas or scenic resources in the Specific Plan area. The existing uses within the Specific Plan area would remain unchanged under the No Project Alternative, though routine maintenance of the Jordan Down public housing complex and the streets in the Specific Plan area would occur. Impacts to visual resources would be greater than with the proposed project as the Specific Plan area would remain blighted. Impacts to light and glare, and shade and shadows under the No Project Alternative would be less than the proposed project, and the significant shadow impacts would be avoided. Impacts to views and vistas and scenic resources would be the same as the proposed project because there are no protected views or vistas or other scenic resources in the vicinity of the Specific Plan area.

Agricultural Resources

Under the No Project Alternative, impacts to agricultural resources would be the same as the proposed project because no portion of the Specific Plan area is designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, nor is any portion of the Specific Plan area enrolled under a Williamson Act contract. Under the No Project Alternative, Mudtown Farms would remain a community garden. Therefore, no impacts to agricultural resources would occur.

Air Quality

Under the No Project Alternative, there are no construction activities that would generate construction-related emissions in the Specific Plan area. The existing uses within the Specific Plan area would remain unchanged and impacts associated with operational emissions would remain the same. Trips generated from the project area would remain the same, resulting in similar GHG emissions to existing conditions. Therefore, no impacts to air quality would occur under the No Project Alternative, and significant impacts would be avoided.

Biological Resources

Under the No Project Alternative, there are no construction activities anticipated that would cause the existing trees in the Specific Plan area to be disturbed. As such, potential bird nesting sites that may exist would not be disturbed. Therefore, impacts under the No Project Alternative would be less than the proposed project because the existing uses within the Specific Plan area would remain unchanged, and no impacts to biological resources would occur.

Cultural Resources

Under the No Project Alternative, there are no construction activities or proposed structures that would require neither the demolition nor the modification of existing historic structures or excavation in the Specific Plan area. The existing uses within the Specific Plan area would remain unchanged. Therefore, impacts to historic, archaeological, and paleontological resources would not occur.

Energy

Under the No Project Alternative, there are no construction activities or additional proposed uses in the Specific Plan area that would increase demand and consumption of energy (petroleum, electricity, or natural gas). The demand and consumption of energy from the uses within the Specific Plan area are

anticipated to remain the same as current conditions. Therefore, impacts under the No Project Alternative would be less than the proposed project and no impacts associated with energy would occur.

Geology and Soils

Under the No Project Alternative, there are no construction activities or proposed structures in the Specific Plan area that would increase the risk of exposure to seismic movement, ground shaking, rupture, soil erosion, unstable geologic units or soils, or encountering expansive soils. The risk of exposure to these geologic forces and features are anticipated to remain the same. Therefore, impacts under the No Project Alternative would be less than the proposed project and no impacts associated with geology and soils would occur.

Hazards and Hazardous Materials

Under the No Project Alternative, there are no construction activities or proposed structures in the Specific Plan area that would result in exposure to hazardous materials or excavation that would result in exposure of contaminated soils or hazardous waste which requires remediation. The Specific Plan area would remain unchanged, including existing contaminated areas along Alameda Street, which would not be remediated. Therefore, impacts under the No Project Alternative would be greater than the proposed project and unavoidable significant impacts associated with hazards and hazardous materials would remain.

Hydrology and Water Quality

Under the No Project Alternative, there are no construction activities or proposed structures in the Specific Plan area that would potentially result in erosion of soils, degrading of surface water or groundwater quality, modification of draining patterns, or an increase in the amount of impervious surfaces. The Specific Plan area would remain unchanged, including existing contaminated runoff from contaminated sites along Alameda Street, which would affect groundwater. Therefore, impacts under the No Project Alternative would be greater than the proposed project and unavoidable significant impacts associated with hydrology and water quality would remain.

Land Use and Planning

Under the No Project Alternative, there are no construction activities or proposed structures in the Specific Plan area that would divide an established community or modify existing land use relationships and compatibility. The boundaries and land use composition of the Jordan Downs public housing complex will remain the same as existing. Therefore, impacts under the No Project Alternative would be less than the proposed project and no impacts associated with land use and planning would occur.

Mineral Resources

Under the No Project Alternative, there are no construction activities or proposed structures in the Specific Plan area that would require excavation or drilling which would impact mineral resources. Therefore, impacts under the No Project Alternative would be similar to the proposed project because the existing uses within the Specific Plan area would remain unchanged and no impacts associated with mineral resources would occur.

Noise and Vibration

Under the No Project Alternative, there are no construction activities that would generate construction-related noise or vibration in the Specific Plan area. The land use composition of the Specific Plan area would not change and there is no anticipated incremental increase in operation noise levels or ground-borne vibration. Therefore, impacts associated with noise and vibration would be less than the proposed project, and significant construction noise impacts would be avoided.

Population, Housing, and Employment

Under the No Project Alternative, there are no construction activities in the Specific Plan area that would displace the existing population, housing, or employment. In addition, there are no proposed developments that would result in population, housing, or employment growth in the Specific Plan area. The population of the Specific Plan area is not anticipated to increase significantly due to the limited housing stock on site. Industrial uses along the Alameda Corridor would remain unchanged, and employment levels would remain unchanged. Therefore, impacts associated with population, housing, and employment displacement or growth would be less than the proposed project and no impacts would occur.

Public Services

Under the No Project Alternative, there are no construction activities or proposed uses in the Specific Plan area that would increase demand for fire protection and emergency services, police protection, public schools, or libraries. The population of the Specific Plan area is not anticipated to increase significantly due to the limited housing stock on-site. Industrial uses along the Alameda Corridor would remain unchanged, and employment levels would remain unchanged. Therefore, impacts associated with public services would be less than the proposed project and no impacts would occur.

Recreation

Under the No Project Alternative, there are no proposed uses in the Specific Plan area that would increase population or employment and, therefore, increase the demand on recreation. The Specific Plan area and the surrounding neighborhoods currently lack sufficient open space and recreational facilities for the existing population. Although demand for open space and recreation would not increase under the No Project Alternative, a deficiency in adequate open space would remain. In addition, there are no plans to build open space in the vicinity of the Specific Plan area. Therefore, open space and recreation deficiency would be worse than under the proposed project. Unavoidable significant impacts related to recreation are anticipated.

Traffic and Transportation

Under the No Project Alternative, there are no construction activities or proposed uses in the Specific Plan area that would generate vehicular trips or disrupt or increase the need for parking. The only additional vehicular trips anticipated are those from ambient traffic growth. Traffic flow within the Specific Plan area is generally anticipated to remain the same, and Century Boulevard would not be extended. Therefore, impacts associated with traffic and transportation would be less than the proposed project and significant project-related impacts would be avoided.

Utilities and Services Systems

Under the No Project Alternative, there are no construction activities or proposed uses in the Specific Plan area that would increase stormwater runoff or impervious surfaces, increase wastewater or solid waste generation, or increase demand for water and associated utility infrastructure. Utilities and services systems within the Specific Plan area are anticipated to remain the same. Therefore, impacts associated with utility and service systems would be less than the proposed project, and no impacts would occur.

E. ANALYSIS OF ALTERNATIVE 2 – REDUCED ANNEXATION AREA ALTERNATIVE

Under Alternative 2, the total amount of residential, open space, and institutional development that would occur would be the same as under the proposed project. The same amount of population and housing are anticipated. However, the 20-acre privately-owned properties and the LAUSD-owned property fronting Alameda Street would not be annexed or included within the Specific Plan. Only 230,000 square feet of commercial/retail uses would be developed under Alternative 2, as opposed to the 522,000 square feet under the proposed project. Alternative 2 would have the same or reduced impacts as the proposed project for the topics shown in **Table V-2**. Refer to the appropriate section for a comprehensive discussion of impacts to that particular topic.

TABLE V-2: SUMMARY OF SIMILAR IMPACTS BETWEEN ALTERNATIVE 2 AND THE PROPOSED PROJECT		
Topic	Section	Impact Conclusion
Aesthetics	IV.A	<i>Views and Vistas</i> : Less-than-significant impacts
		<i>Scenic Resources</i> : Less-than-significant impacts
		<i>Lighting and Glare</i> : Less-than-significant impacts with mitigation
		<i>Shade and Shadows</i> : Unavoidable significant impacts
Agricultural Resources	IV.B	No impacts
Biological Resources	IV.D	Less-than-significant impacts with mitigation
Cultural Resources	IV.E	Less-than-significant impacts with mitigation
Geology and Soils	IV.G	Less-than-significant impacts with mitigation
Hydrology and Water Quality	IV.I	<i>Surface Water Quality</i> : Less-than-significant impacts
		<i>Drainage and Flooding</i> : Less-than-significant impacts
Mineral Resources	IV.K	Less-than-significant impacts
Noise and Vibration	IV.L	<i>Construction Noise</i> : Unavoidable significant impacts
		<i>Vibration</i> : Less-than-significant impacts
Population, Housing & Employment	IV.M	<i>Population & Housing</i> : Less-than-significant impacts with mitigation
Public Services	IV.N	<i>Fire, Police & Libraries</i> : Less-than-significant impacts with mitigation
		<i>Schools</i> : Less-than-significant impacts
Recreation	IV.O	Less-than-significant impacts
Traffic and Transportation	IV.P	<i>CMP and Parking</i> : Less-than-significant impacts
SOURCE : TAHA, 2010.		

It is anticipated that reducing the annexation area under Alternative 2 would have the following impacts:

Aesthetics

Visual Character. Under the Alternative 2, the visual character of the Specific Plan area would change less than the proposed project at the southeastern corner of the area. Alternative 2 would create a visual contrast between the new, modern development and the blighted look of the industrial uses along

Alameda Street. Under Alternative 2, impacts associated with visual character would be greater than the proposed project. Unavoidable significant impacts related to visual character would occur.

Air Quality

Under Alternative 2, there would be less construction and fewer vehicle miles travelled than the proposed project. During the construction of Alternative 2, NO_x and PM₁₀ regional emissions, as well as PM_{2.5} and PM₁₀ local concentrations, are anticipated to exceed regional and local significance thresholds, similar to the proposed project. During operations, Alternative 2 would result in 12,405 daily vehicle trips, compared to the proposed project, which would generate 14,150 daily vehicle trips, of which 1,745 trips are associated with the projected 250,000 square feet of commercial space projected under the CM zone designation in the privately-held parcels. Although Alternative 2 would result in fewer daily vehicle trips, operational emissions under Alternative 2 are anticipated to exceed regional significance thresholds for VOC, NO_x, CO, and PM₁₀, and GHG emissions are anticipated to exceed the 4.6 metric tons of CO_{2e} per year per service population significance threshold, similar to the proposed project. Therefore, unavoidable significant impacts associated with air quality would remain.

Energy

Petroleum. Under Alternative 2 approximately 126,515 annual VMT would be generated, which is a reduction of annual VMT by 12 percent. Using the average fuel economy of 22.4 miles per gallon for vehicles used by residents and employees of the Specific Plan area, Alternative 2 would consume 2,833,836 gallons per year.¹⁰ The petroleum usage of Alternative 2 would be approximately 396,916 gallons less per year compared to the proposed project. Consequently, Alternative 2 would not require additional petroleum supplies. Therefore, less-than-significant impacts associated with petroleum consumption are anticipated.

Electricity. As shown in **Table V-3**, the estimated electricity usage under Alternative 2 is approximately 10.7 GWh per year. The electricity usage under Alternative 2 would be approximately 0.73 GWh less per year compared to the proposed project. Also, Alternative 2 would not require construction of new or expansion of existing electricity generating resources. Therefore, less-than-significant impacts associated with electricity usage are anticipated.

Natural Gas. As shown in **Table V-4**, the estimated natural gas usage under Alternative 2 is approximately 5.3 million cubic feet per month. The natural gas usage of Alternative 2 would be approximately 380,000 cubic feet less per month compared to the proposed project. Also, Alternative 2 would not require additional natural gas resources. Therefore, less-than-significant impacts associated with natural gas usage are anticipated.

¹⁰United States Department of Energy, Office of Energy Efficiency and Renewable Energy, *Transportation Energy Book: Edition 27*, 2008.

TABLE V-3: ALTERNATIVE 2 – ESTIMATED ELECTRICITY USAGE			
Use	Units	Electricity Usage Factor (kwh/unit or sq ft/year)	Electricity Usage (kwh/year)
Residential	1,800 dwelling units	5625.50	10,125,900
Commercial/Retail	210,000 square feet	13.55	2,845,500
Mixed Uses	20,000 square feet	13.55	271,000
David Starr Jordan Downs HS	240,800 square feet	10.50	2,528,400
High School Expansion	80,000 square feet	10.50	840,000
Elementary School	80,000 square feet	5.90	472,000
Family Resource Center	50,000 square feet	10.50	525,000
Joint-use gymnasium	17,000 square feet	10.50	178,500
Pool Facility	3,000 square feet	10.50	31,500
Alternative 2 Total Electricity Usage			17,817,800
Less Existing Usage of Existing Uses			(7,140,050)
Alternative 2 Net Electricity Usage			10,677,750
Proposed Project Electricity Usage			11,408,550
Net Increase/Decrease Compared to Proposed Project			(730,800)
SOURCE: Davis Langdon, <i>Master Plan Horizontal and Public Investments, Residential and Commercial Development – Draft Cost Study for Jordan Downs Development Los Angeles, California</i> , March 31, 2010.			

TABLE V-4: ALTERNATIVE 2 – ESTIMATED NATURAL GAS USAGE			
Use	Units	Natural Gas Usage Factor (cubic feet/month)	Natural Gas Usage (cubic feet/month)
Residential	1,800 dwelling units	4011.50	7,220,700
Commercial/Retail	210,000 square feet	2.90	609,000
Mixed Uses	20,000 square feet	2.90	58,000
David Starr Jordan Downs HS	240,800 square feet	2.90	698,320
High School Expansion	80,000 square feet	2.90	232,000
Elementary School	80,000 square feet	2.90	232,000
Family Resource Center	50,000 square feet	2.90	145,000
Joint-use gymnasium	17,000 square feet	2.90	49,300
Pool Facility	3,000 square feet	2.90	8,700
Alternative 2 Total Natural Gas Usage			9,253,020
Less Existing Usage of Existing Uses			(3,926,670)
Alternative 2 Net Natural Gas Usage			5,326,350
Proposed Project Electricity Usage			5,706,050
Net Increase/Decrease Compared to Proposed Project			(379,700)
SOURCE: Davis Langdon, <i>Master Plan Horizontal and Public Investments, Residential and Commercial Development – Draft Cost Study for Jordan Downs Development Los Angeles, California</i> , March 31, 2010.			

Hazards and Hazardous Materials

Under Alternative 2, impacts associated with hazards and hazardous materials would be greater than those under the proposed project because under Alternative 2, the industrial uses would remain on the southeastern portion of the Specific Plan area. These uses would be located adjacent to new housing and to a potential expansion of Jordan High School. The risk of exposure of residents to hazardous materials and potential contamination would be greater due to their close proximity to these industrial uses. In addition, under the proposed project, these industrial parcels would eventually be remediated if deemed necessary under Alternative 2, they would not be remediated. Therefore, long-term exposure to hazardous materials and contamination are anticipated. Additional mitigation would be required to reduce impacts to less-than-significant levels. Therefore, potentially significant impacts associated with hazards and hazardous materials are anticipated.

Hydrology and Water Quality

Groundwater. Under Alternative 2, impacts associated with groundwater quality are anticipated to be similar to those of the proposed projects from the uses that overlap. However, because the industrial uses on the southeastern portion of the Specific Plan area would remain and would not be controlled under the Specific Plan, any contamination from these uses could affect the groundwater in the vicinity of the new development. Therefore, there is the potential for unavoidable significant impacts associated with groundwater.

Land Use and Planning

Under Alternative 2, the industrial uses would remain within unincorporated Los Angeles County and maintain their industrial zoning. Alternative 2 would develop residences on the HACLA-owned parcel that would be annexed to the City of Los Angeles. Thus, residences would be located in close proximity to these industrial uses and this would result in the continued conflict of incompatible land uses. Under Alternative 2, land use control would be limited to the parcels currently under City of Los Angeles jurisdiction and the HACLA-owned parcels formerly in the unincorporated County area. Alternative 2 does not include a buffer between sensitive uses (residence and schools) and industrial areas. Therefore, unavoidable significant impacts associated with incompatible land uses are anticipated.

Noise and Vibration

Operational Noise. Under Alternative 2, impacts associated with operational noise would be greater than the proposed project. Although the industrial uses in the southeastern portion of the Specific Plan area are not anticipated to increase the ambient noise levels, new residences would be in closer proximity to these uses under Alternative 2. Because these industrial parcels would not be under the Specific Plan, City of Los Angeles noise ordinances would not apply. Although the County of Los Angeles has similar noise level ordinances, the residents may potentially have limited ability to demand enforcement of these noise ordinances because they are in a different jurisdiction. Therefore, unavoidable significant impacts associated with operational noise are anticipated.

Population, Housing, and Employment

Employment. Alternative 2 would result in less commercial development than the proposed project, which would result in 417 fewer jobs than under the proposed project (**Table IV-5**). Similar to the proposed project, the number of jobs created under Alternative 2 would not exceed SCAG employment growth for the City of Los Angeles. In addition, similarly to the proposed project, Alternative 2 would provide beneficial impacts to the Specific Plan area by providing a net increase in jobs. Refer to section IV.M Population Housing and Employment for a discussion on potential impacts related to employment. Less-than-significant impacts associated with employment are anticipated.

TABLE V-5: ALTERNATIVE 2 - JOB GENERATION			
Land Use Type	Unit	Employment Calculation Factor	Jobs Estimate
Commercial/Retail	210,000 square feet	500 square feet/employee	420
Mixed-Use Commercial	20,000 square feet	500 square feet/employee	40
Family Resource Center	50,000 square feet	500 square feet/employee	100
Joint-Use Gymnasium	17,000 square feet	1,000 square feet/employee	17
Pool Facility	3,000 square feet	1,000 square feet/employee	3
High School Expansion	750 students	0.13:1 teacher/student ratio	99
New Elementary School	650 students	0.13:1 teacher/student ratio	86
Total Job Generation for Alternative 2			765
Total Job Generation for the Proposed Project			1,182
Job Generation Difference Compared to Proposed Project			(417)
<small>SOURCE: WRT/Solomon E.T.C., <i>Envision Watts: Vision Jordan Downs, Community-Based Master Plan for Jordan Downs, Existing Conditions Report</i>, 2010 and TAHA. 2010.</small>			

Traffic and Transportation

Intersection Analysis. Under Alternative 2, trip generation impacts would be less than those of the proposed project. Without the southeastern portion of the Specific Plan area, a regional-scale shopping center would not be built and daily vehicle trips would decrease by 12 percent (**Table V-6**). Under Alternative 2 approximately 12,405 daily trips would be generated, including 922 AM peak hour trips, and 1,028 PM peak hour trips. This is approximately 1,745 fewer daily trips than the proposed project.¹¹

Utilities and Services Systems

Stormwater and Drainage. Under Alternative 2, impacts associated with stormwater and drainage would be similar to the proposed project. Although the total square footage of commercial/retail uses that would be developed is less than the proposed project, the existing industrial properties and the LAUSD-owned property along Alameda Street are already developed with impervious surfaces. Less-than-significant impacts associated with stormwater and drainage are anticipated.

Wastewater. Under Alternative 2, wastewater generation would result in 10,914 fewer gallons per day (gpd) than the existing condition (**Table V-7**). In contrast, the proposed project is estimated to generate approximately 21,892 gpd of wastewater more than the existing condition. Thus, Alternative 2 would generate 32,806 gpd less than the proposed project. Therefore, less-than-significant impacts associated with wastewater generation or infrastructure are anticipated.

Water. Under Alternative 2, water demand would be reduced by 10,914 less gpd compared to the existing condition (**Table V-7**). In contrast, the proposed project is estimated to increase water demand by approximately 21,892 gpd compared to the existing condition. Thus, Alternative 2 would require 32,806 gpd less water than the proposed project. Therefore, less-than-significant impacts associated with water demand or infrastructure are anticipated.

Solid Waste – Construction. Under Alternative 2, 295,333 tons per day of solid waste would be generated during construction (**Table V-7**). In contrast, the proposed project is estimated to generate approximately 295,897 tons per day of solid waste during construction. Thus, Alternative 2 would generate 564 less tons per day of solid waste than the proposed project. Therefore, less-than-significant impacts associated with construction solid waste and conveyance are anticipated.

¹¹The proposed project would generate approximately 14,150 daily trips, including 1,166 AM peak hour trips, and 1,265 PM peak hour trips.

TABLE V-6: ALTERNATIVE 2 - ESTIMATED TRIP GENERATION										
Land Use	Value	Trips								
		Daily			AM Peak			PM Peak		
		In	Out	Total	In	Out	Total	In	Out	Total
Existing units	(700)	(2,328)	(2,328)	(4,656)	(71)	(286)	(357)	(282)	(152)	(434)
Rental units	1,300	4,323	4,323	8,646	133	530	663	524	282	806
Senior units	100	174	174	348	5	8	13	10	6	16
5% Affordable Housing Credit (Existing and Project)		(108)	(108)	(216)	(3)	(13)	(16)	(13)	(7)	(20)
Condominiums (units)	400	1,162	1,162	2,324	30	146	176	139	69	208
Residential Subtotal		3,223	3,223	6,446	93	387	479	378	198	576
Community Facilities (square feet) /a/	70,000	798	798	1,596	69	45	114	38	65	103
Internal Community Trips (50 %)		(399)	(399)	(798)	(35)	(22)	(57)	(19)	(32)	(51)
Community Facilities Subtotal		399	399	798	34	23	57	19	33	52
Open Space (acres)	11	9	9	18	<1	<1	<1	<1	<1	<1
Open Space Subtotal		9	9	18	<1	<1	<1	<1	<1	<1
Schools (students) /b/	1,400	1,060	1,060	2,120	301	272	573	94	102	196
Schools Subtotal		1,060	1,060	2,120	301	272	573	94	102	196
Commercial Uses (square feet)	230,000	4,458	4,458	8,916	29	75	104	404	319	723
Pass-by Trips /c/		(1,695)	(1,695)	(3,390)	(48)	(31)	(79)	(144)	(152)	(296)
Commercial Subtotal		2,763	2,763	5,526	19	44	25	260	167	427
Project Subtotal		7,455	7,455	14,910	409	726	1,134	751	499	1,250
15% Transit Credit		(1,249)	(1,249)	(2,498)	(97)	(113)	(210)	(118)	(105)	(223)
Total Project Trips		6,206	76,206	12,412	312	613	924	633	394	1,027

/a/ Community facilities will be primarily designed as on-site facilities for Jordan Downs residents resulting in a 50% internal capture assumption.
/b/ AM Peak Hour School Trip Generation Rates from LAUSD trip generation rates for schools in the South Region, per the March 14, 2005 Memorandum of Cooperation between the LAUSD and LADOT.
/c/ Pass-By Trips are trips made as intermediate stops on the way from an origin to a primary trip destination. To account for trips that come from the everyday traffic stream (i.e., existing traffic on Alameda Street or 103rd Street), peak hour pass-by reduction factors were utilized
SOURCE: Iteris, Jordan Downs Specific Plan Traffic Impact Study, June 2010.

TABLE V-7: ALTERNATIVE 2 - UTILITY GENERATION RATES				
Utility	Units	Proposed Project	Alternative 2	Difference Relative to Proposed Project
Wastewater Generation	gallons per day	21,892	(10,914)	(32,806)
Water Demand	gallons per day	21,892	(10,914)	(32,806)
Solid Waste Generation – Construction	tons per day	295,897	295,333	(564)
Solid Waste Generation - Operational	pounds per day	22,375	10,863	(11,512)

Note: For more detailed figures, including existing uses, refer to the Section IV.Q Utilities and Service Systems.
SOURCE: Los Angeles Department of Water and Power, Water Supply Assessment – Jordan Downs Specific Plan Area

Solid Waste – Operational. Under Alternative 2, 10,863 pounds per day (ppd) of solid waste would be generated compared to the existing condition (Table V-7). In contrast, the proposed project is estimated to generate approximately 22,375 ppd of solid waste compared to the existing condition. Thus,

Alternative 2 would generate 11,512 less ppd of solid waste than the proposed project. Therefore, less-than-significant impacts associated with operational solid waste and conveyance are anticipated.

F. ANALYSIS OF ALTERNATIVE 3 – REDUCED HEIGHT ALTERNATIVE

Under Alternative 3, the total amount of residential, commercial, open space, and institutional development that would occur would be the same as under the proposed project. The same amount of population, housing, and employment are anticipated. Most of the configuration of the buildings would be the same as the proposed project; however, the 60-foot tall buildings along 97th Street would be relocated within the interior of the Specific Plan area. Alternative 3 would have the same impacts as the proposed project for the topics shown in **Table V-8**. Refer to the appropriate section for a comprehensive discussion of impacts to that particular topic.

TABLE V-8: SUMMARY OF SIMILAR IMPACTS BETWEEN ALTERNATIVE 3 AND THE PROPOSED PROJECT		
Topic	Section	Impact Conclusion
Aesthetics	IV.A	<i>Visual Character</i> : See discussion below.
		<i>Views and Vistas</i> : No Impact
		<i>Scenic Resources</i> : No Impact
		<i>Lighting and Glare</i> : Less-than-significant impacts with mitigation
Agricultural Resources	IV.B	No impacts
Air Quality	IV.C	Unavoidable significant impacts
Biological Resources	IV.D	Less-than-significant impacts with mitigation
Cultural Resources	IV.E	Less-than-significant impacts with mitigation
Energy	IV.F	Less-than-significant impacts with mitigation
Geology and Soils	IV.G	Less-than-significant impacts with mitigation
Hazards & Hazardous Materials	IV.H	Less-than-significant impacts with mitigation
Hydrology and Water Quality	IV.I	Less-than-significant impacts
Land Use and Planning	IV.J	Less-than-significant impacts with mitigation
Mineral Resources	IV.K	Less-than-significant impacts
Noise and Vibration	IV.L	<i>Construction Noise</i> : Unavoidable significant impacts
		<i>Operational Noise</i> : Less-than-significant impacts with mitigation
		<i>Vibration</i> : Less-than-significant impacts
Population, Housing & Employment	IV.M	<i>Population & Housing</i> : Less-than-significant impacts with mitigation
		<i>Employment</i> : Less-than-significant impacts
Public Services	IV.N	<i>Fire, Police & Libraries</i> : Less-than-significant impacts with mitigation
		<i>Schools</i> : Less-than-significant impacts
Recreation	IV.O	Less-than-significant impacts
Traffic and Transportation	IV.P	<i>Intersection Analysis</i> : Unavoidable significant impacts
		<i>CMP and Parking</i> : Less-than-significant impacts
Utilities and Service Systems	IV.Q	Less-than-significant impacts with mitigation
SOURCE: TAHA, 2010.		

It is anticipated that the relocation of the taller buildings to the interior of the Specific Plan area and placement of smaller buildings at the edge would modify impacts to aesthetics as follows:

Visual Character. Under Alternative 3, the visual character of the Specific Plan area would be similar to the proposed project. Although the relocation of the 60-foot tall buildings to the interior of the Specific Plan area and the location of 30-foot tall buildings in their place would partially modify the arrangement of buildings compared to the proposed project, the same number of buildings would still be developed

and the visual character would be modified as intensely as with the proposed project. Refer to Section IV.A Aesthetics for a comprehensive discussion of impacts related to visual character. Less-than-significant impacts with mitigation are anticipated.

Shade and Shadows. Under Alternative 3, impacts associated with shade and shadows would be less than those of the proposed project. Under Alternative 3, the 60-foot-tall buildings at the perimeter of the Specific Plan area along 97th Street would be relocated in the interior of the Specific Plan area and be replaced with 30-foot tall buildings. The 30-foot tall buildings would not cast shadows on the residences along 97th Street for more than three hours during Winter Solstice. Therefore, under Alternative 3, significant impacts associated with shade and shadows would be avoided.

G. ANALYSIS OF ALTERNATIVE 4 –INDUSTRIAL ZONE ALTERNATIVE

Under Alternative 4, the total amount of residential and community facility development would be the same as under the proposed project. However, the privately-owned properties currently located within unincorporated areas of Los Angeles County would be zoned M2 (Light Industrial) upon annexation to the City of Los Angeles instead of CM (Commercial Manufacturing), which is what the Project proposes. The M2 zoning designation would allow the existing industrial uses to continue operating without becoming a legal non-conforming use. Under Alternative 4 commercial uses would not be developed on these properties. Alternative 4 would have the same impacts as the proposed project for the topics shown in **Table V-9**. Refer to the appropriate section for a comprehensive discussion of impacts to that particular topic.

TABLE V-9: SUMMARY OF SIMILAR IMPACTS BETWEEN ALTERNATIVE 4 AND THE PROPOSED PROJECT		
Topic	Section	Impact Conclusion
Aesthetics	IV.A	<i>Views and Vistas:</i> Less-than-significant impacts
		<i>Scenic Resources:</i> Less-than-significant impacts
		<i>Lighting and Glare:</i> Less-than-significant impacts with mitigation
		<i>Shade and Shadows:</i> Unavoidable significant impacts
Agricultural Resources	IV.B	No impacts
Biological Resources	IV.D	Less-than-significant impacts with mitigation
Cultural Resources	IV.E	Less-than-significant impacts with mitigation
Geology and Soils	IV.G	Less-than-significant impacts with mitigation
Hydrology and Water Quality	IV.I	<i>Surface Water Quality:</i> Less-than-significant impacts
		<i>Drainage and Flooding:</i> Less-than-significant impacts
Mineral Resources	IV.K	Less-than-significant impacts
Noise and Vibration	IV.L	<i>Construction Noise:</i> Unavoidable significant impacts
		<i>Vibration:</i> Less-than-significant impacts
Population, Housing & Employment	IV.M	<i>Population & Housing:</i> Less-than-significant impacts with mitigation
Public Services	IV.N	<i>Fire, Police & Libraries:</i> Less-than-significant impacts with mitigation
		<i>Schools:</i> Less-than-significant impacts
Recreation	IV.O	Less-than-significant impacts
Traffic and Transportation	IV.P	<i>CMP and Parking:</i> Less-than-significant impacts
SOURCE: TAHA, 2010.		

It is anticipated that retaining industrial uses along Alameda Street under Alternative 4 would have the following impacts:

Aesthetics

Visual Character. Under Alternative 4, the visual character of the Specific Plan area would change less than the proposed project at the southeastern corner of the area because the existing uses at this corner would remain the same. Alternative 4 would create a visual contrast between the new, modern development and the blighted look of the industrial uses along Alameda Street. Therefore, under Alternative 4, impacts associated with visual character would be greater than the proposed project. Unavoidable significant impacts would occur related to visual character.

Air Quality

Under Alternative 4, there would be less construction and fewer vehicle miles travelled than the proposed project. During the construction of Alternative 4, NO_x and PM₁₀ regional emissions, as well as PM_{2.5} and PM₁₀ local concentrations, are anticipated to exceed regional and local significance thresholds, similar to the proposed project. During operations, Alternative 4 would result in 12,405 daily vehicle trips, compared to the proposed project, which would generate 14,150 daily vehicle trips, of which 1,745 trips are associated with the projected 250,000 sq. ft of commercial space projected under the CM zone designation in the privately-held parcels. Although Alternative 4 would result in fewer daily vehicle trips, operational emissions under Alternative 4 are anticipated to exceed regional significance thresholds for VOC, NO_x, CO, and PM₁₀, and GHG emissions are anticipated to exceed the 4.6 metric tons of CO₂e per year per service population significance threshold, similar to the proposed project. Therefore, unavoidable significant impacts associated with air quality would remain.

Energy

Petroleum. Under Alternative 4, approximately 126,515 annual VMTs would be generated, which comprise a 12 percent reduction of annual VMTs compared to the proposed project. Using the average fuel economy of 22.4 miles per gallon for vehicles used by residents and employees of the Specific Plan area, Alternative 4 would consume 2,833,836 gallons per year.¹² The petroleum usage of Alternative 4 would be approximately 396,916 gallons less per year compared to the proposed project. Consequently, Alternative 4 would not require additional petroleum supplies. Therefore, less-than-significant impacts associated with petroleum consumption are anticipated.

Electricity. Under Alternative 4, the estimated electricity usage is approximately 10.7 GWh per year (Refer to **Table V-3** under Alternative 2). The electricity usage under Alternative 4 would be approximately 0.73 GWh less per year compared to the proposed project. Also, Alternative 4 would not require construction of new or expansion of existing electricity generating resources. Therefore, less-than-significant impacts associated with electricity usage are anticipated.

Natural Gas. Under Alternative 4, the estimated natural gas usage is approximately 5.3 million cubic feet per month (Refer to **Table V-4** under Alternative 2). The natural gas usage under Alternative 4 would be approximately 380,000 cubic feet less per month compared to the proposed project. Also, Alternative 4 would not require additional natural gas resources. Therefore, less-than-significant impacts associated with natural gas usage are anticipated.

¹²United States Department of Energy, Office of Energy Efficiency and Renewable Energy, *Transportation Energy Book: Edition 27*, 2008.

Hazards and Hazardous Materials

Under Alternative 4, impacts associated with hazards and hazardous materials would be greater than those under the proposed project because under Alternative 4, the industrial uses would remain on the southeastern portion of the Specific Plan area. These uses would be located adjacent to new housing and to a potential expansion of Jordan High School. The risk of exposure of residents to hazardous materials and potential contamination would be greater due to their closer proximity to these industrial uses. In addition, under the proposed project, these industrial parcels would eventually be remediated if deemed necessary. Under Alternative 4, it is assumed they would not be remediated. Therefore, long-term exposure to hazardous materials and contamination are anticipated. Additional mitigation would be required to reduce impacts to less-than-significant levels. Therefore, potentially significant impacts associated with hazards and hazardous materials are anticipated.

Hydrology and Water Quality

Groundwater. Under Alternative 4, impacts associated with groundwater quality are anticipated to be similar to those of the proposed project from the uses that overlap. However, because the industrial uses on the southeastern portion of the Specific Plan area would remain industrial and would not undergo remediation, any contamination from these uses could affect the groundwater in the vicinity of the new development. Therefore, there is the potential for unavoidable significant impacts associated with groundwater.

Land Use and Planning

Under Alternative 4, the industrial uses would remain and would be zoned M-2 under the City of Los Angeles Zoning Code in order to be conforming uses. Alternative 4 would develop residences on the HACLA-owned parcel that would be annexed to the City of Los Angeles. Thus, residences would be located in close proximity to these industrial uses and this would result in the continued conflict of incompatible land uses. Alternative 4 does not include a buffer between sensitive uses (residence and schools) and industrial areas. Therefore, unavoidable significant impacts associated with incompatible land uses are anticipated.

Noise and Vibration

Operational Noise. Under Alternative 4, impacts associated with operational noise would be greater than the proposed project. Although the industrial uses in the southeastern portion of the Specific Plan area are not anticipated to increase the ambient noise levels, new residences would be in closer proximity to these uses under Alternative 4. These industrial parcels would be under the jurisdiction of the City of Los Angeles noise ordinances, and additional mitigation would be required to ensure adequate noise levels during operations. Therefore, less-than-significant impacts associated with operational noise are anticipated with mitigation.

Population, Housing, and Employment

Employment. Alternative 4 would result in less commercial development than the proposed project, which would result in 417 fewer jobs than under the proposed project (Refer to Table IV-5 under Alternative 2). Similar to the proposed project, the number of jobs created under Alternative 4 would not exceed SCAG employment growth for the City of Los Angeles. In addition, similarly to the proposed project, Alternative 4 would provide beneficial impacts to the Specific Plan area by providing a net increase in jobs. Refer to section IV.M Population Housing and Employment for a discussion on potential impacts related to employment. Less-than-significant impacts associated with employment are anticipated.

Traffic and Transportation

Intersection Analysis. Under Alternative 4, trip generation impacts would be less than those of the proposed project. By not developing the southeastern portion of the Specific Plan area as a regional-scale shopping center, daily vehicle trips would decrease by 12 percent (Refer to **Table V-6** under Alternative 2). Under Alternative 4 approximately 12,405 daily trips would be generated, including 922 AM peak hour trips, and 1,028 PM peak hour trips. This is approximately 1,745 fewer daily trips than the proposed project.¹³ However, unavoidable significant impacts at the intersections identified under the proposed project would remain.

Utilities and Services Systems

Stormwater and Drainage. Under Alternative 4, impacts associated with stormwater and drainage would be similar to the proposed project. Although the total square footage of commercial/retail uses that would be developed is less than the proposed project, the existing industrial properties and the LAUSD-owned property along Alameda Street are already developed with impervious surfaces. Less-than-significant impacts associated with stormwater and drainage are anticipated.

Wastewater. Under Alternative 4, wastewater generation would result in 10,914 fewer gpd than the existing condition (**Table V-10**). In contrast, the proposed project is estimated to generate approximately 21,892 gpd of wastewater more than the existing condition. Thus, Alternative 4 would generate 32,806 gpd less than the proposed project. Therefore, less-than-significant impacts associated with wastewater generation or infrastructure is anticipated.

TABLE V-10: ESTIMATED WASTEWATER GENERATION, WATER DEMAND, AND SOLID WASTE GENERATION UNDER ALTERNATIVE 4				
Utility	Units	Proposed Project	Alternative 4	Difference Relative to Proposed Project
Wastewater Generation	gallons per day	21,892	(10,914)	(32,806)
Water Demand	gallons per day	21,892	(10,914)	(32,806)
Solid Waste Generation – Construction	tons per day	295,897	295,333	(564)
Solid Waste Generation - Operational	pounds per day	22,375	10,863	(11,512)
<small>Note: For more detailed figures, including existing uses, refer to the Section IV.Q Utilities and Service Systems. SOURCE: Los Angeles Department of Water and Power, Water Supply Assessment – Jordan Downs Specific Plan Area</small>				

Water. Under Alternative 4, water demand would be reduced by 10,914 gpd compared to the existing condition (**Table V-10**). In contrast, the proposed project is estimated to increase water demand by approximately 21,892 gpd compared to the existing condition. Thus, Alternative 4 would require 32,806 gpd less water than the proposed project. Therefore, less-than-significant impacts associated with water demand or infrastructure are anticipated.

Solid Waste – Construction. Under Alternative 4, 295,333 tons per day of solid waste would be generated during construction (**Table V-10**). In contrast, the proposed project is estimated to generate approximately 295,897 tons per day of solid waste during construction. Alternative 4 would generate 564 fewer tons per day of solid waste than the proposed project and, therefore, less-than-significant impacts associated with construction solid waste and conveyance are anticipated.

Solid Waste – Operational. Under Alternative 4, 10,863 pounds per day (ppd) of solid waste would be generated compared to the existing condition (**Table V-10**). In contrast, the proposed project is estimated to generate approximately 22,375 ppd of solid waste compared to the existing condition. Thus,

¹³The proposed project would generate approximately 14,150 daily trips, including 1,166 AM peak hour trips, and 1,265 PM peak hour trips.

Alternative 4 would generate 11,512 less ppd of solid waste than the proposed project. Therefore, less-than-significant impacts associated with operational solid waste and conveyance are anticipated.

H. ENVIRONMENTALLY SUPERIOR ALTERNATIVE

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

The No Project Alternative would have the least amount of impacts because there would be no construction or development on the Specific Plan area. However, the proposed project would not meet any of the project objectives. As was stated in the introduction to the document, the Jordan Downs public housing complex contains housing stock that is over 50 years old that is in a blighted condition and needs significant investment to provide adequate living conditions for its residents. Under the No Project Alternative, no replacement housing would be constructed in the foreseeable future and the blighted condition of the housing stock would remain and potentially get worse. In addition, there are no incentives to increase commercial development in the area, the existing zoning would not yield the number of units that meets HACLA’s objective, the inefficient street grid and superblocks discourage mobility, and no increase in employment is anticipated. For these reasons, the No Project Alternative, though environmentally superior, would fail to meet the project’s objective and would not improve the quality of life of the current residents.

A summary of the remaining three build alternatives’ impacts relative to the proposed project are shown **Table V-11**.

TABLE V-11: SUMMARY OF BETTER/WORSE IMPACTS BETWEEN ALL BUILD ALTERNATIVES AND THE PROPOSED PROJECT		
Alternative	Better than Proposed Project	Worse than Proposed Project
(2) Reduced Annexation Area	Energy Trip Generation (AQ & Traffic) Utilities & Service Systems	Visual Character Hazards & Hazardous Materials Groundwater Quality Land Use Compatibility Operational Noise
(3) Reduced Height	Shade and Shadows	None
(4) Industrial Zone	Energy Trip Generation (AQ & Traffic) Utilities & Service Systems	Visual Character Hazards & Hazardous Materials Groundwater Quality Land Use Compatibility
SOURCE: TAHA, 2010.		

The Reduced Annexation Area Alternative (Alternative 2) would reduce impacts associated with energy consumption, trip generation, and utilities and service systems. The Reduced Annexation Area Alternative would involve somewhat less intensive development of the Specific Plan area, though it would mainly eliminate commercial development on 20 acres of land along Alameda Street. However, new unavoidable significant impacts associated with visual character, hazards and hazardous materials, groundwater quality, land use compatibility, and operational noise are anticipated.

The Reduced Height Alternative (Alternative 3) would have the same impacts as the proposed project but would avoid shade and shadow impacts on the residences along 97th Street.

The Industrial Zone Alternative (Alternative 4) would reduce impacts associated with energy consumption, trip generation, and utilities and service systems. The Industrial Zone Alternative would involve less development of the Specific Plan area, as it would eliminate commercial development on approximately 20 acres of land along Alameda Street. However, new unavoidable significant impacts associated with visual character, hazards and hazardous materials, groundwater quality, and land use compatibility are anticipated.

Of the three build alternatives, Alternative 3 would be considered the environmentally superior alternative because it avoids one significant impact (shade and shadow) and does not create additional adverse environmental impacts.