

## V. ALTERNATIVES TO THE PROPOSED PROJECT

### A. REASONS FOR ALTERNATIVES ANALYSIS

The State CEQA Guidelines require the identification and evaluation of a reasonable range of alternatives (identified in Section II, Project Description of this EIR).<sup>1</sup> The CEQA Guidelines further discuss the intent and extent of the alternatives analysis to be provided in an EIR. Alternatives are an important tool in the CEQA process to provide decisionmakers with comparative information about the impacts of a specific project, and how other possible projects could reduce those impacts, even if some of the objectives of the project are not met.

As stated in Section 15151 of the CEQA Guidelines, an EIR must contain "...a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes into account environmental consequences" of the proposed action. Identification and evaluation of a range of reasonable project alternatives as required by Section 15126.6(c) of the CEQA Guidelines is an essential part of providing sufficient information. Pursuant to Section 15126.6(e)(2) of the CEQA Guidelines, the discussion of alternatives must also identify the environmentally superior alternative. The intent of the alternatives analysis is to ensure that other approaches to avoid or reduce significant environmental impacts were considered. The merits of the alternatives and how potential environmental impacts of the alternatives compare to the project offer valuable information to the lead agency.

### B. NUMBER OF ALTERNATIVES EVALUATED

Neither the CEQA statute, the CEQA Guidelines, nor recent court cases 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."<sup>2</sup> However, the CEQA Guidelines require that a "No Project" alternative must be included, and if appropriate, an alternative site location should be analyzed.<sup>3</sup> If appropriate, other project alternatives may involve a modification of the proposed land uses, density, or other project elements at the same project location.

#### CRITERIA FOR ESTABLISHING ALTERNATIVES

Alternatives should be selected on the basis of their ability to attain 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."<sup>4</sup> 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..."<sup>5</sup> "The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and

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<sup>1</sup> Section 15126.6.

<sup>2</sup> Section 15126.6(f).

<sup>3</sup> Section 15126.6(e) and Section 15126(f)(2).

<sup>4</sup> Section 15126.6(e) and Section 15126(f).

<sup>5</sup> Section 15126.6(f)(1).

informed decision making.”<sup>6</sup> Alternatives that are considered remote or speculative, or whose effects cannot be reasonably predicted do not require consideration. Thus, although the potential to mitigate significant project-related impacts and to reasonably inform the decision-maker are primary considerations in the selection and evaluation of alternatives, so is feasibility.

The primary objectives for the MGA North Campus mixed-use project are as follows:

- To transform the existing underutilized site into a vibrant mixed-use urban campus that integrates housing and employment with an abundance of amenities and open space.
- To creatively reuse/repurpose the former Los Angeles Times printing facility as a corporate headquarters, while serving as a significant employer in the Chatsworth-Porter Ranch Community Plan area, and greater San Fernando Valley.
- To facilitate a reduction in trips and vehicle miles traveled and promote multi-modal transportation options by providing mixed uses, a Transit Plaza, an on-site transit “concierge” and a private shuttle to connect with service to local transit destinations.
- To provide rental housing in response to demand, including MGA employees, (thereby fulfilling objectives of the Housing Element of the General Plan).
- Adopt hybrid Industrial - Commercial land use designation and zoning to allow mixed-use campus that preserves (clean) light industrial, creative and corporate office uses on the site and complements, and provides a transition to, surrounding land uses.
- To provide a sustainable development consistent with the principles of smart growth and LEED standards including sustainable design features, renewable energy, mixed uses, LID stormwater controls and other features.

### C. OVERVIEW OF ALTERNATIVES CONSIDERED

As addressed in this EIR, the project could create unavoidable significant impacts to traffic. The project-level impact that would occur with the proposed development are as follows:

- **Traffic** -- The project would significantly impact two intersections in the future plus project condition: 1) Corbin Avenue and Plummer Avenue in the PM peak hour; and 2) Corbin Avenue and Prairie Street in the AM peak hour

Other potentially significant impacts have been identified prior to mitigation, 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 would minimize vehicle trips and vehicle miles traveled in the region by providing mixed uses and a transit plaza. Any evaluated alternatives should meet as many of these project objectives as possible.

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<sup>6</sup> Section 15126.6(f).

The following alternatives analysis presents an analysis of project alternatives and compares impacts to those of the proposed project. The following alternatives were selected in accordance with their ability to reduce the potential environmental impacts of the project:

*NO PROJECT/REHABILITATE EXISTING BUILDING (ALTERNATIVE 1)*

This alternative is required by Section 15126.6(e) of the CEQA Guidelines and assumes that the proposed project is not developed on the project site. The existing building would be rehabilitated and used for commercial/light industrial use. Future development opportunities would remain open.

*EXISTING ZONING – GENERAL PLAN/ZONING COMPLIANT (ALTERNATIVE 2)*

This alternative would result in the existing building being demolished and a new corporate office use being constructed on the project site. A four-story building with 851,400 square feet of space and 1,703 surface parking spaces could be developed under this alternative. The building would accommodate mainly corporate office (and possibly ancillary creative office uses).

*REDUCED DENSITY/REDUCED HEIGHT – 594 RESIDENTIAL UNITS (ALTERNATIVE 3)*

This alternative would develop the site with a mixed-use project similar to the proposed project but with one fewer levels of housing (reducing the heights of the buildings to a maximum of six stories rather than seven). This alternative would include a 594 rental housing units (compared to 700 units with the project) and the same MGA headquarters and leased office space (255,815 square feet) and 14,000 square feet of retail and restaurant.

**D. ALTERNATIVE 1 - NO PROJECT – REHABILITATE EXISTING BUILDING**

*DESCRIPTION OF THE ALTERNATIVE*

The “No Project” Alternative addresses retaining existing conditions, 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.... If disapproval of the project under consideration would result in predictable actions by others, such as the proposal of some other project, this ‘no project’ consequence should be discussed.”<sup>7</sup> Under this No Project Alternative, the existing light industrial building and associated surface parking would be rehabilitated and occupied by the MGA headquarters and possibly the same (43,000 square feet) leased creative office space as would occur under the project.

**Impact Comparison**

The following environmental impacts would be expected with rehabilitation of the existing building under this No Project Alternative. While the respective Environmental Setting discussions for each area of potential impact are addressed in detail throughout Section III, Environmental Setting, Impacts and Mitigation Measures, of this EIR, rehabilitation of the existing building would result in new operational impacts as compared to the substantially

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<sup>7</sup> CEQA Guidelines, Section 15126.6(e) and Section 15126.6(e)(3)(B).

vacant existing building as a result of occupancy of the building consuming more resources (water, energy, etc.), and the site generating vehicle trips that do not occur at present.

### *Aesthetics/Views*

Under the No Project/Rehabilitation Alternative, no new structures would be introduced and the aesthetic environment of the project site would remain similar to existing conditions, possibly with some enhanced landscaping. The increased density and massing associated with the proposed project would not occur. Therefore, the No Project—Rehabilitate Existing Building Alternative would have no impact on the aesthetic environment compared to the less than significant impact of the project.

### *Air Quality*

Under the No Project/Rehabilitation Alternative, the majority of construction activity would be related to interior renovations. This alternative would require less heavy-duty equipment use and truck trips, and would generate less construction-related exhaust emissions. Similar to the proposed project, this alternative could include the application of new architectural coatings. It is anticipated that unmitigated VOC emissions could exceed the SCAQMD regional significance threshold. This impact could be eliminated with the implementation of Mitigation Measure MM-AQ-1—use of architectural coatings with a volatile organic compound content of 30 grams per liter or less. However, since CEQA review may not be required the City may not be able to require this mitigation measure.

Regional operational emissions are presented in **Table V-1**. Combined area and mobile source emissions for this alternative would not exceed the SCAQMD significance thresholds. Regional emissions would be less-than-significant without implementation of mitigation measures. Regarding localized CO concentrations, this alternative would generate less peak hour traffic than the proposed project and would not result in a hot-spot. In addition, it is not anticipated that the land use would generate substantial truck trips resulting significant toxic air contaminant emissions, or include significant sources of odors.

TABLE V-1 ESTIMATED DAILY OPERATIONS EMISSIONS – NO PROJECT ALTERNATIVE						
Emission Source	Pounds per Day					
	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>2.5</sub>	PM <sub>10</sub>
<b>FUTURE WITH ALTERNATIVE 1 CONDITIONS (2019)</b>						
Area Source	22	3	3	<1	<1	<1
Mobile Source	3	24	76	<1	2	3
<b>Total</b>	<b>25</b>	<b>27</b>	<b>79</b>	<b>&lt;1</b>	<b>2</b>	<b>3</b>
<b>SCAQMD Threshold</b>	<b>55</b>	<b>55</b>	<b>550</b>	<b>150</b>	<b>55</b>	<b>150</b>
Exceed Threshold?	No	No	No	No	No	No
<b>SOURCE:</b> Terry A. Hayes Associates Inc., 2014.						

### *Biological Resources*

Under this alternative, the proposed new structures would not be built and the existing on-site building would be re-occupied. The Tree Report recommends that 101 of the 310 trees on-site

be removed regardless of design. These trees would be removed and replaced with new trees. As for the project, the No Project Alternative would result in a less than significant impact to biological resources.

#### *Geology and Soils*

The existing on-site building would be re-occupied. This Alternative would not include any grading and would not result in potential soil erosion during construction. This alternative would also be subject to the same seismic conditions as the proposed project. Project occupants, as with all buildings in this seismically active area, would be subject to ground shaking. Project occupants would not be at increased risk compared to other buildings in the area. As with the project, impacts would be less than significant.

#### *Greenhouse Gases*

GHG emissions were estimated for Business as Usual (BAU) and the No Project/Rehabilitation Alternative scenarios. BAU emissions were based on 2008 Building Energy Standards, which were used by CARB to establish the AB 32 reduction goals. The analysis includes implementation of 2013 Building Energy Standards, as required by Title 24 regulations. **Table V-2** presents unmitigated GHG emissions for BAU and this alternative. This alternative would generate 5.3 percent fewer emissions than the BAU analysis for the future plus project scenario. The reductions would result from the implementation of 2013 Building Energy Standards. The GHG reductions would not meet the 15.3 percent BAU requirement necessary to achieve AB 32 mandates. Therefore, without Project Design Features and/or mitigation, the No Project/Rehabilitation Alternative could result in a significant impact related to GHG emissions and consistency with GHG reduction plans. It is anticipated that although CEQA review may not be required, that energy reduction strategies would still be incorporated in to the design of the rehabilitated building.

TABLE V-2 GHG EMISSIONS – NO PROJECT ALTERNATIVE (WITHOUT PDF OR MITIGATION)			
Source	Carbon Dioxide Equivalent (Metric Tons Per Year)		
	BAU	No Project Alternative	Percent Reduction
<b>FUTURE WITH ALTERNATIVE 1 CONDITIONS (2019)</b>			
<b>ONE-TIME EMISSIONS</b>			
Construction	145	145	0%
<b>BUILDOUT EMISSIONS</b>			
Non-Residential Energy	1,322	1,151	13%
Non-Building Energy (e.g., Parking Lights)	497	282	43%
Water Cycle Energy	1,049	1,049	0%
Solid Waste Energy	360	360	0%
Mobile Sources	3,976	3,976	0%
Landscaping Maintenance	<1	<1	-
<b>TOTAL</b>	<b>7,349</b>	<b>6,963</b>	<b>5.3%</b>
<b>SOURCE:</b> Terry A. Hayes Associates Inc., 2014.			

**PDF-III.B-1** would reduce energy use beyond 2013 Building Energy Standards through the implementation of higher efficiency items. The project includes Project Design Features (**PDF-III.K-2** and **PDF-III.K-3**), including shuttles and a Transit Demand Management Program that

would reduce VMT by more than 20 percent. For the proposed project, average daily trips would be reduced in part due to having a mix of land uses. This trip reduction was not accounted for in this alternative because the only land use is a corporate headquarters. **Table V-3** presents mitigated GHG emissions for BAU and the No Project/Rehabilitation Alternative. This alternative would generate 15.2 percent fewer emissions than the BAU analysis for the future plus project scenario. The reductions would result from the implementation of 2013 Building Energy Standards and TDM that would be implemented by MGA.

The rehabilitation of existing buildings is a strategy for reducing GHG emissions associated with new development as building reuse generates fewer construction exhaust emissions and life-cycle emissions associated with building materials. However, in this case, the rehabilitation and occupation of the existing building would not include the same GHG-reduction features as the proposed project (i.e., mix of land uses leading to VMT reductions). While total emissions under this alternative would be less than the project, emissions from the proposed use under this alternative, compared to Business as Usual operations for this type of use would not quite meet the 15.3 percent reduction from BAU necessary to achieve AB 32 mandates. However, because the reduction would be very close to the target and because it would reuse the existing building, this impact is not considered significant.

TABLE V-3 GHG EMISSIONS – NO PROJECT ALTERNATIVE (WITH SOME PDF)			
Source	Carbon Dioxide Equivalent (Metric Tons Per Year)		
	BAU	No Project Alternative	Percent Reduction
<b>FUTURE WITH ALTERNATIVE 1 CONDITIONS (2019)</b>			
<b>ONE-TIME EMISSIONS</b>			
Construction	145	145	0%
<b>BUILDOUT EMISSIONS</b>			
Non-Residential Energy	1,322	1,151	13%
Non-Building Energy (e.g., Parking Lights)	497	282	43%
Water Cycle Energy	1,049	1,049	0%
Solid Waste Energy	360	360	0%
Mobile Sources	3,976	3,321	16.5%
Landscaping Maintenance	<1	<1	-
Solar Panels	-	(76)	-
<b>TOTAL</b>	<b>7,349</b>	<b>6,232</b>	<b>15.2%</b>
<b>SOURCE:</b> Terry A. Hayes Associates Inc., 2014.			

### *Hazards and Hazardous Materials*

As for the project, impacts associated with hazards and hazardous materials would be less than significant for the No Project Alternative. As for the project, compliance with existing regulations would ensure that any existing on-site hazardous materials are handled and removed in a manner that would result in a less than significant impact.

### *Hydrology and Water Quality*

Under this alternative, the proposed project would not be built and the existing on-site building would remain and be reoccupied. The existing drainage system would remain and existing impervious surfaces would remain at approximately 68% of the site as compared to 74% of the

site with the project). Urban pollutants (e.g., metals, ammonia, coliform, nutrients (algae), pesticides, etc.) such as those present on-site would continue to contribute to degraded water quality within receiving waters. Increased activity on-site could increase the pollutant load on-site but not to the same extent as the project. The No Project Alternative would still implement BMPs to improve water quality. Therefore, as with the project impacts to hydrology and water quality would be less than significant.

#### *Land Use and Planning*

The proposed project would continue the existing light industrial, creative office use. The project would not optimize use of the site and would not create a campus environment or provide additional housing. The No Project Alternative would avoid the less than significant impact of introducing residential uses in to an industrially zoned area (although the project's housing component is ancillary to an employment use and integrated into a campus environment). Impacts from this alternative, as with the project, would be less than significant.

#### *Noise and Vibration*

Under the No Project/Rehabilitation Alternative, the majority of construction activity would be related to interior renovations. This alternative would require less heavy-duty equipment use and would generate less construction noise and vibration. Similar to the proposed project, construction noise and vibration impacts would be less than significant.

Regarding operational activity, the No Project/Rehabilitation Alternative would generate fewer average daily vehicle trips than the proposed project. The developed land use would be related to light industrial and creative office activity, which does not typically generate significant truck traffic associated with heavy industrial uses. This alternative would generate less mobile noise than the proposed project, and would also result in a less-than-significant mobile noise impacts. It is anticipated that other sources of noise and vibration (i.e., mechanical equipment and parking activity) would be designed similar to the proposed project, and would also result in less-than-significant noise and vibration impacts. The proposed project requires mitigation to eliminate an impact related to locating new residences near a rail track. The proposed project requires mitigation to eliminate an impact related to locating new residences near a rail track. The Rehabilitation of the Existing Building Alternative would not include new sensitive land uses such as residences, and there would be no impact related to land use compatibility and no mitigation would be needed.

#### *Public Services (Fire and Police Protection, Schools, Parks and Libraries)*

Because existing use of the site is minor, reoccupation of the on-site building would increase demand for public services compared to today. As with the project, impacts to public services would be less than significant, but would be further reduced by this alternative that does not generate a residential population, particularly impacts to schools, parks and libraries.

#### *Transportation and Circulation*

The No Project Alternative would result in similar impacts as the proposed project. **Table V-4** provides trip generation for the No Project Alternative and **Table V-5** shows intersection impacts (without mitigation); three intersections would be significantly impacted. Mitigation may not be

required of the No Project Alternative as CEQA review may not be needed. Therefore this project could have greater impacts on traffic than the project.

TABLE V-4 NO PROJECT ALTERNATIVE TRIP GENERATION								
No Project Alternative	Size	Daily	AM Peak Hour			PM Peak Hour		
			Total	In	Out	Total	In	Out
Corporate Headquarters	255,815 SF	2,822	399	351	48	381	65	316
<b>SOURCE:</b> Overland Traffic Consultants. January 2014.								

TABLE V-5 FUTURE TRAFFIC CONDITIONS WITH AND WITHOUT NO PROJECT ALTERNATIVE							
No.	Intersection	Peak Hour	Future Without Alternative		Future With Alternative 1		Alternative 1 Impact
			CMA	LOS	CMA	LOS	
1.	Mason Avenue & Plummer Street	AM	0.808	D	0.823	D	+ 0.015
		PM	0.792	C	0.808	D	+ 0.016
2.	Winnetka Avenue & Lassen Street	AM	0.616	B	0.653	B	+ 0.037
		PM	0.553	A	0.572	A	+ 0.019
3.	Winnetka Avenue & Plummer Street	AM	0.600	A	0.631	B	+ 0.031
		PM	0.459	A	0.486	A	+ 0.027
4.	Winnetka Avenue & Prairie Street	AM	0.397	A	0.431	A	+ 0.034
		PM	0.445	A	0.502	A	+ 0.057
5.	Winnetka Avenue & Nordhoff Street	AM	0.839	D	0.863	D	<b>+ 0.024*</b>
		PM	0.758	C	0.781	C	+ 0.023
6.	Winnetka Avenue & Parthenia Street	AM	0.819	D	0.847	D	<b>+ 0.028*</b>
		PM	0.781	C	0.796	C	+ 0.015
7.	Winnetka Avenue & Roscoe Boulevard	AM	0.810	D	0.819	D	+ 0.009
		PM	0.864	D	0.875	D	+ 0.011
8.	Corbin Avenue & Plummer Street	AM	0.894	D	0.919	E	<b>+ 0.025*</b>
		PM	0.837	D	0.857	D	<b>+ 0.020*</b>
9.	Corbin Avenue & Prairie Street	AM	0.667	B	0.791	C	<b>+ 0.057*</b>
		PM	0.570	A	0.601	B	+ 0.031
10.	Corbin Avenue & Nordhoff Place	AM	0.393	A	0.411	A	+ 0.018
		PM	0.564	A	0.575	A	+ 0.011
11.	Corbin Avenue & Nordhoff Street./Nordhoff Way	AM	0.823	D	0.828	D	+ 0.005
		PM	0.728	C	0.738	C	+ 0.010
* Indicates significant impact							
<b>SOURCE:</b> Overland Traffic Consultants, Inc., August 2014.							

#### Utilities (Wastewater, Water Supply, Solid Waste, Energy)

Because existing use of the site is minor, reoccupation of the on-site building would increase demand for utilities compared to today. However, the demand for water supply, solid waste disposal service or landfill capacity, and energy or associated infrastructure would be substantially reduced compared to the project, and therefore impacts would be less than the project, although project impacts would be less than significant impact. The alternative would



also be below the threshold requirement for a Water Supply Assessment, which was undertaken for the project.<sup>8</sup>

### **Relationship of the Alternative to Project Objectives**

The No Project Alternative would meet one of the project objectives -- to creatively reuse/repurpose the former Los Angeles Times printing facility as a corporate headquarters, while serving as a significant employer in the Chatsworth-Porter Ranch Community Plan area. However, this alternative would not meet any of the other project objectives – to provide a mixed-use urban campus, reduce vehicle miles travelled and VMT in the region, and provide a sustainable development consistent with smart growth principles and LEED. The alternative would leave existing uses in place without any new construction; it would not provide housing opportunities in response to current demand. Thus, while this alternative would reduce most impact (although the significant impact to traffic would not be eliminated and could be greater), it would not meet most project objectives.

### **Conclusion**

No new development would occur on the project site. As discussed in more detail above and at the end of this EIR section, the No Project/Rehabilitate Existing Building Alternative would have fewer impacts compared to the proposed project with respect to construction air quality, and other issue areas as compared to the project. Because the site is currently only lightly used, impacts to traffic would be greater than under existing conditions and could be greater than the project because the City may not be able to impose mitigation measures on a rehabilitation project. The rehabilitation and occupation of the existing building would include some energy saving components but would not include the same GHG-reduction features as the proposed project (e.g., mix of land uses leading to VMT reductions). The No Project Alternative/Rehabilitate Existing Building would only meet one of the six project objectives.

## **E. ALTERNATIVE 2 – GENERAL PLAN/ZONING COMPLIANT ALTERNATIVE**

### **DESCRIPTION OF THE ALTERNATIVE**

This alternative would result in the existing building being demolished and a new corporate office being constructed on the project site. A single four-story building with 851,400 square feet of floor area and 1,703 surface parking spaces could be developed with this alternative. The building would accommodate mainly corporate office (and possibly ancillary creative office uses).

This alternative would be smaller in scale than the proposed project. It would be comprised of a blocky building surrounded by surface parking. The parking lot would be required to include trees and other landscaping, but there would be minimal to no usable open space.

This alternative would not creatively reuse/repurpose the former Los Angeles Times printing facility as a corporate headquarters, but it would serve as a significant employer in the Chatsworth-Porter Ranch Community Plan area, and greater San Fernando Valley. It would not preserve and rehabilitate the LA Times building, provide a mix of uses, and while the new building would be required to incorporate sustainable elements (to reduce energy consumption

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<sup>8</sup> For industrial projects, a Water Supply Assessment is required if over 650,000 square feet, 40 acres or housing more than 1,000 persons.

and comply with Title 24), it would not incorporate a mix of uses and transit plaza to reduce regional trips.

All the regulatory compliance measures that apply to the project as well as the mitigation measures would apply to this alternative unless otherwise noted.

**Figure V-1** provides a site plan for Alternative 2 – General Plan/Zoning Compliant Alternative, and **Figure V-2** provides an axonometric view of Alternative 2 (note, these exhibits are not intended to present any architectural value or characteristic and are only a graphic depiction of what could occur with one possible scenario).

### **Impact Comparison**

The following environmental impacts would be expected with development of a new industrial use. The respective Environmental Setting discussions for each area of potential impact are addressed in detail throughout Section III, Environmental Setting, Impacts and Mitigation Measures, of this Draft EIR.

#### *Aesthetics and Visual Resources*

This alternative would result in a different impact as compared to the project – all development would be internal to the site and the new four-story building would be surrounded by surface parking. The surface parking area would be required to include shade trees (one tree for every four spaces or about 426 trees). As with the proposed project, the alternative would be visually compatible with surrounding uses and generally enhance the visual character of the site. However, the alternative would not develop a campus like setting with associated open space, resident amenities and design themes provided by the project. As with the project, the alternative, which would have less developed area and height, would not have a significant lighting or shading impact. Overall, the alternative would have a less than significant impact on aesthetic resources, different from the proposed project, but still less than significant.

#### *Air Quality*

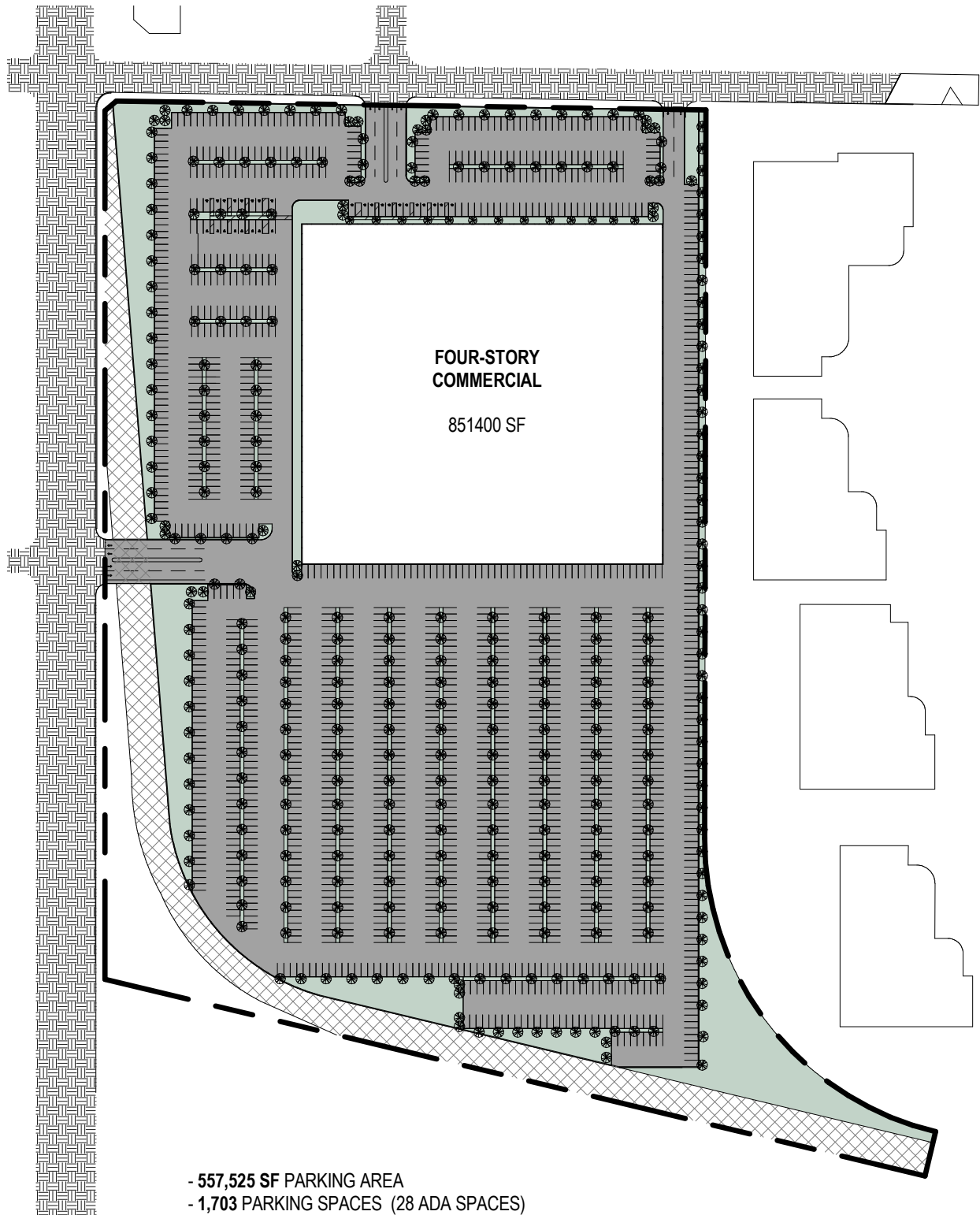
Under this alternative, daily construction activity and intensity (e.g., heavy-duty equipment use) would be similar to the proposed project. Total emissions would be less due to a reduction in floor area and associated construction activity. However, the significance thresholds are based on pounds per day of emissions, which would be similar to the emissions presented in **Table III.B-5**. Similar to the proposed project, this alternative would include the application of new architectural coatings. It is anticipated that unmitigated VOC emissions would exceed the SCAQMD regional significance threshold. This impact would be eliminated with the implementation of Mitigation Measure MM-AQ-1, which requires architectural coatings with a volatile organic compound content of 30 grams per liter or less.

Regional operational emissions without mitigation are presented in **Table V-6**. Total emissions would generally be greater due to a 13 percent increase in average daily trips. Similar to the proposed project, this alternative would include Project Design Features and Mitigation Measures to reduce energy use and average daily trips. Mitigated regional emissions are presented in **Table V-7**. Because of increased traffic associated with this alternative as compared to the proposed project, mitigated emissions would exceed the NO<sub>x</sub> significance threshold under future with project conditions. Therefore, operational activity under this

alternative would result in a significant and unavoidable regional air quality impact (compared to a less than significant impact with the project). Regarding localized CO concentrations, the concentrations estimated using proposed project traffic were approximately 10 percent of the State standards. As for the project, concentrations would be well below the State standards even when considering a 13 percent increase in traffic. In addition, it is not anticipated that the land use would generate substantial truck trips resulting significant toxic air contaminant emissions, or include significant sources of odors.

TABLE V-6 ESTIMATED DAILY OPERATIONS EMISSIONS – GENERAL PLAN/ZONING COMPLIANT ALTERNATIVE (UNMITIGATED)						
Emission Source	Pounds per Day					
	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>2.5</sub>	PM <sub>10</sub>
<b>FUTURE WITH ALTERNATIVE 2 CONDITIONS (2019)</b>						
Area Source	22	3	2	<1	<1	<1
Mobile Source	10	81	251	1	5	11
<b>Total</b>	<b>32</b>	<b>84</b>	<b>253</b>	<b>1</b>	<b>5</b>	<b>11</b>
<b>SCAQMD Threshold</b>	<b>55</b>	<b>55</b>	<b>550</b>	<b>150</b>	<b>55</b>	<b>150</b>
Exceed Threshold?	No	Yes	No	No	No	No
<b>SOURCE:</b> Terry A. Hayes Associates Inc., 2014.						

TABLE V-7 ESTIMATED DAILY OPERATIONS EMISSIONS – GENERAL PLAN/ZONING COMPLIANT ALTERNATIVE (MITIGATED)						
Emission Source	Pounds per Day					
	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>2.5</sub>	PM <sub>10</sub>
<b>FUTURE WITH ALTERNATIVE 2 CONDITIONS (2019)</b>						
Area Source	22	3	2	<1	<1	<1
Mobile Source	8	67	209	1	4	10
<b>Total</b>	<b>30</b>	<b>70</b>	<b>211</b>	<b>1</b>	<b>4</b>	<b>10</b>
<b>SCAQMD Threshold</b>	<b>55</b>	<b>55</b>	<b>550</b>	<b>150</b>	<b>55</b>	<b>150</b>
Exceed Threshold?	No	Yes	No	No	No	No
<b>SOURCE:</b> Terry A. Hayes Associates Inc., 2014.						



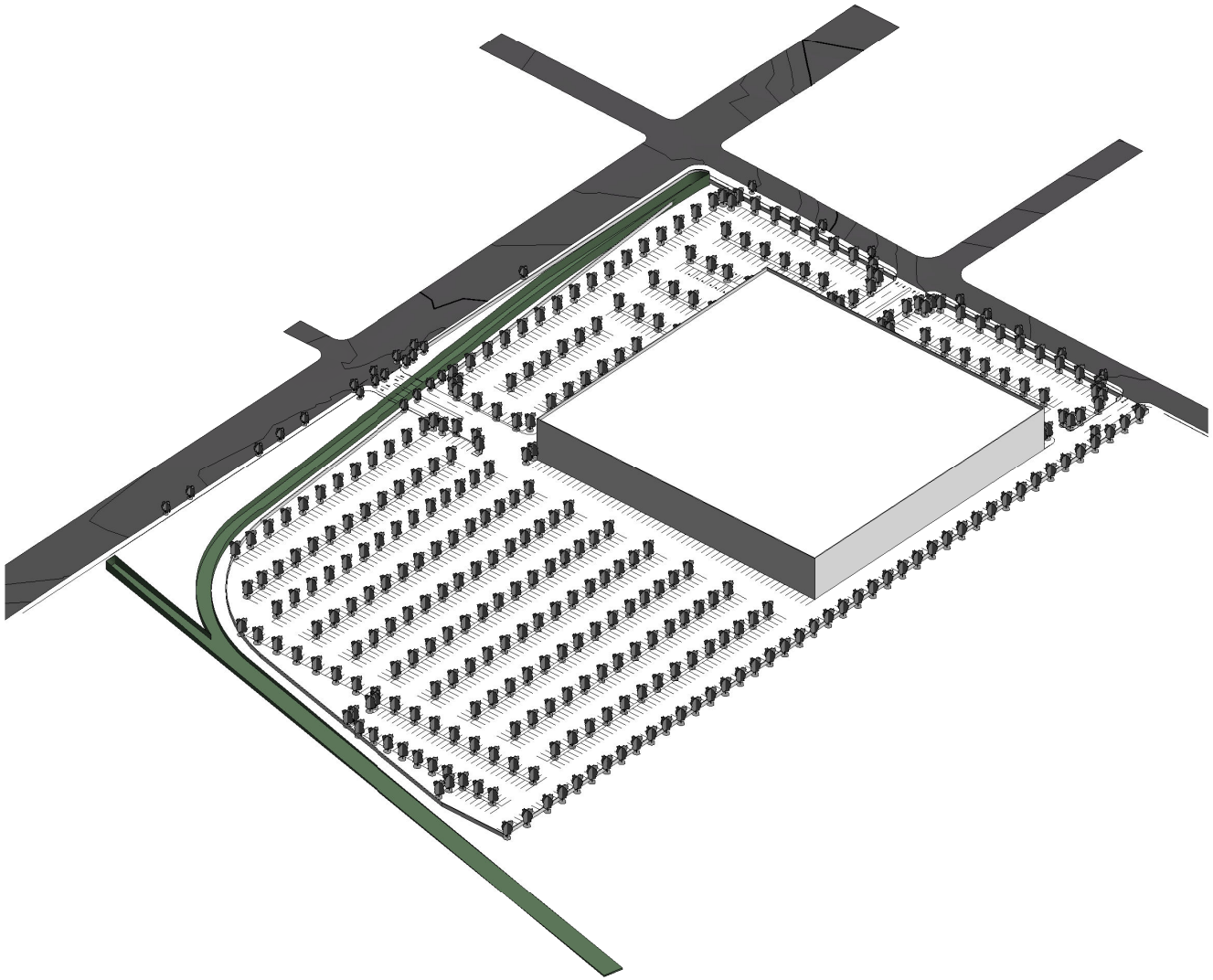
- 557,525 SF PARKING AREA
- 1,703 PARKING SPACES (28 ADA SPACES)
- MIN. 22,301 SF DEVOTED TO SITE IMPROVEMENTS (4% OF PARKING AREA)

SOURCE: Killefer Flammang Architects, 2014

MGA Mixed-Use Campus Project ■

**Figure V-1**

Alternative 2 - General Plan/Zoning Compliant Alternative Site Plan



SOURCE: Killefer Flammang Architects, 2014

MGA Mixed-Use Campus Project ■

**Figure V-2**

Alternative 2 - General Plan/Zoning Compliant Alternative Axonometric View

### *Biological Resources*

This alternative could result in removal or transplantation of more trees than the project. However, replacement trees would be required and one tree per four surface parking spaces would be required. As with the project, the alternative would not result in the conversion of plant communities or wildlife habitat. Therefore, as with the project, impacts to biological resources would be less than significant.

### *Geology and Soils*

This alternative would result in construction of a new four-story building of less total area and height as the project. The alternative would be subject to the same geologic, seismic and soils conditions as the project, and as with the project, a geotechnical report would be required in order to ensure appropriate building design for these conditions. As with the project, impacts would be less than significant.

### *Greenhouse Gases*

GHG emissions were estimated for BAU and Alternative 2. BAU emissions were based on 2008 Building Energy Standards, which were used by CARB to establish the AB 32 reduction goals. The analysis includes implementation of 2013 Building Energy Standards, as required by Title 24 regulations. **Table V-8** presents GHG emissions for BAU and Alternative without Project Design Features that would specifically address GHG emissions. This alternative would generate 2.3% percent fewer GHG emissions than the BAU analysis for the future plus project scenario. The reduction would result from the implementation of 2013 Building Energy Standards. However, the GHG reductions would not meet the 15.3 percent reduction from BAU requirement necessary to achieve AB 32 mandates. Therefore, without Project Design Features to reduce GHG emissions, this alternative would result in a significant impact related to GHG emissions and consistency with GHG reduction plans.

**PDF-III.B-1** would reduce energy use beyond 2013 Building Energy Standards through the implementation of higher efficiency items. **PDF-III.K-2** and **PDF-III.K-3** includes project shuttles and a Transit Demand Management Program with various features that would reduce VMT. The proposed project would also reduce average daily trips in part due to having a mix of land uses. This trip reduction would not occur under this alternative because the only land use is a corporate headquarters.

**Table V-9** presents GHG emissions for BAU and the Existing Zoning Alternative. This alternative would not include a mix of uses that would reduce VMT and therefore GHG emissions. This alternative would generate 16.2 percent fewer emissions than the BAU analysis for the future plus project scenario. The reductions would result from the implementation of 2013 Building Energy Standards and reductions in VMT due to discouraging vehicle trips in the office use. The GHG reductions would exceed the 15.3 percent BAU requirement necessary to achieve AB 32 mandates. Therefore, this alternative would result in a less than significant impact related to GHG emissions and consistency with GHG reduction plans.

TABLE V-8 GHG EMISSIONS – GENERAL PLAN/ZONING COMPLIANT ALTERNATIVE (WITHOUT PDF OR MITIGATION)			
Source	Carbon Dioxide Equivalent (Metric Tons Per Year)		
	BAU	Existing Zoning Alternative	Percent Reduction
<b>FUTURE WITH ALTERNATIVE 2 CONDITIONS (2019)</b>			
<b>ONE-TIME EMISSIONS</b>			
Construction	145	145	0%
<b>BUILDOUT EMISSIONS</b>			
Non-Residential Energy	1,322	1,151	13%
Non-Building Energy (e.g., Parking Lights)	497	282	43%
Water Cycle Energy	881	881	0%
Solid Waste Energy	360	360	0%
Mobile Sources	13,231	13,231	0%
Landscaping Maintenance	<1	<1	0%
<b>TOTAL</b>	<b>16,436</b>	<b>16,050</b>	<b>2.3%</b>
<b>SOURCE:</b> Terry A. Hayes Associates Inc., 2014.			

TABLE V-9 GHG EMISSIONS – GENERAL PLAN/ZONING COMPLIANT ALTERNATIVE (WITH PDF AND MITIGATION)			
Source	Carbon Dioxide Equivalent (Metric Tons Per Year)		
	BAU	Existing Zoning Alternative	Percent Reduction
<b>FUTURE WITH ALTERNATIVE 2 CONDITIONS (2019)</b>			
<b>ONE-TIME EMISSIONS</b>			
Construction	145	145	0%
<b>BUILDOUT EMISSIONS</b>			
Non-Residential Energy	1,322	1,151	13%
Non-Building Energy (e.g., Parking Lights)	497	282	43%
Water Cycle Energy	881	881	0%
Solid Waste Energy	360	360	0%
Mobile Sources	13,231	11,032	16.6%
Landscaping Maintenance	<1	<1	0%
Solar Panels	-	(76)	-
<b>TOTAL</b>	<b>16,436</b>	<b>13,775</b>	<b>16.2%</b>
<b>SOURCE:</b> Terry A. Hayes Associates Inc., 2014.			

### Hazards and Hazardous Materials

As for the project, impacts associated with hazards and hazardous materials would be less than significant for the General Plan/Zoning Compliant Alternative. As for the project, compliance with existing regulations would ensure that any existing on-site hazardous materials are handled and removed in a manner that would result in a less than significant impact. However, current regulations would still be expected to ensure that hazards are reduced to a less than significant level. But in general cleaner industrial uses that are substantially office would be expected which would not result in additional hazardous materials on the site as compared to the project.

### *Hydrology and Water Quality*

Under this alternative, impacts to hydrology and water quality, as described in **Section III.G Hydrology & Water Quality** of this EIR would be similar. The project site is already substantially developed (68% impervious surfaces). Development proposed under this alternative would potentially remove more existing trees to allow for sufficient surface parking, but replacement trees and shade trees for surface parking (one tree for every four parking spaces or 426 trees) would be required in the surface parking lot. The site would have similar to greater coverage with impervious surfaces as the project. Similar to the proposed project, development under this alternative would be subject to SUSMP requirements and would be required to not increase stormwater flows. Therefore, as with the proposed project, impacts to hydrology and water quality would be less than significant.

### *Land Use and Planning*

This alternative would be consistent with the existing General Plan designation and the MR2-1 and P-1 zoning. It would allow the site to continue in exclusively corporate office (with ancillary creative office use). This alternative would reduce the (less than significant) impact of the project that would result from introducing an ancillary residential use in to an industrial zone as part of an integrated mixed-use campus project. This alternative would not address goals related to provision of housing.

### *Noise and Vibration*

Under this alternative, the overall amount of new construction and daily construction activity would be slightly less than the proposed project. Accordingly, as with the proposed project, construction noise and vibration impacts would be less than significant.

Regarding operational activity, this alternative would generate greater average daily vehicle trips than the proposed project. In general, corporate office activity is anticipated, which does not typically generate significant truck traffic or other noises associated with heavy industrial uses. This alternative would generate greater mobile noise than the proposed project, the impact would remain less-than-significant. It is anticipated that other sources of noise and vibration (i.e., mechanical equipment and parking activity) would be similar to the proposed project, and would also result in less-than-significant noise and vibration impacts. The proposed project requires mitigation to eliminate an impact related to locating new residences near a rail track. This alternative would not include new sensitive land uses such as residences, and there would be no impact related to land use compatibility and no mitigation would be needed.

### *Public Services (Fire and Police Protection, Schools, Parks and Libraries)*

**Fire Protection** - Although this alternative would eliminate the residential component (and associated permanent population), it would still generate increased demand for fire protection. As with the project, the alternative would not cause a substantial adverse physical impact on fire protection facilities or the need for new or physically altered fire protection facilities in order to maintain acceptable response times. Impacts would be similar to the proposed project and could be reduced with the implementation of **Regulatory Compliance Measures RC-III.J-1** through **RC-III.J-9** for fire flow, safety, access, and other design requirements similar to the project.



Police Protection - This alternative would eliminate the residential component, and could reduce demand for police protection as compared to the project. Implementation of **Project Design Features PDF-II.J-1** through **PDF-III.J-3**, **Regulatory Compliance Measures RC-III.J-10** through **RC-III.J-14** and **Mitigation Measures MM-III.J-1** through **MM-III.J-2** would reduce impacts to a less than significant level.

Schools – With the elimination of the residential component, this alternative would reduce impacts on schools compared to the project. It is anticipated that this alternative would generate a total demand of 40 students. Implementation of **Regulatory Compliance Measures RC-III.I-15** would reduce impacts below a level of significance, and the less than significant impact of the project would be further reduced with the alternative.

Parks – Corporate and creative office uses are not normally associated with park and recreational demand and therefore, impact under this alternative would be less than significant without mitigation, and reduced in comparison to the project.

Libraries – Corporate and creative office uses are not normally associated with library demand and therefore, impact under this alternative would be less than significant without mitigation and reduced in comparison to the project.

*Transportation and Circulation*

Traffic impacts associated with the General Plan/Zoning Compliant Alternative would be greater than the proposed project with eight (8) significantly impacted intersections: Mason Avenue and Plummer Street, Winnetka Avenue and Lassen Street, Winnetka Avenue and Plummer Street, Winnetka Avenue and Nordhoff Street, Winnetka Avenue and Parthenia Street, and at Winnetka Avenue and Roscoe Boulevard.

**Table V-10** shows trip generation for the General Plan/Zoning Complaint Alternative and **Table V-11** shows intersection impacts (without mitigation). While mitigation could further reduce these impacts, because trip generation would be greater impacts would be greater than the project.

TABLE V-10 GENERAL PLAN/ZONING COMPLIANT ALTERNATIVE - TRIP GENERATION								
General Plan/Zoning Compliant Alternative	Size	Daily	AM Peak Hour			PM Peak Hour		
			Total	In	Out	Total	In	Out
Corporate Headquarters	851,400 SF	9,390	1,328	1,169	159	1,269	216	1,053

**SOURCE:** Overland Traffic Consultants. January 2014.

TABLE V-11 FUTURE TRAFFIC CONDITIONS WITH AND WITHOUT GENERAL PLAN/ZONING COMPLIANT ALTERNATIVE							
No.	Intersection	Peak Hour	Future Without Alternative		Future With Alternative 2		Alternative 2 Impact
			CMA	LOS	CMA	LOS	
1.	Mason Avenue & Plummer Street	AM	0.808	D	0.847	D	+ 0.039*
		PM	0.792	C	0.827	D	+ 0.035*
2.	Winnetka Avenue & Lassen Street	AM	0.616	B	0.738	C	+ 0.122*
		PM	0.553	A	0.617	B	+ 0.064
3.	Winnetka Avenue & Plummer Street	AM	0.600	A	0.703	C	+ 0.103*
		PM	0.459	A	0.547	B	+ 0.088
4.	Winnetka Avenue & Prairie Street	AM	0.397	A	0.512	A	+ 0.115
		PM	0.445	A	0.635	B	+ 0.190
5.	Winnetka Avenue & Nordhoff Street	AM	0.839	D	0.872	D	+ 0.033*
		PM	0.758	C	0.912	E	+ 0.077*
6.	Winnetka Avenue & Parthenia Street	AM	0.819	D	0.909	E	+ 0.093*
		PM	0.781	C	0.829	D	+ 0.048*
7.	Winnetka Avenue & Roscoe Boulevard	AM	0.810	D	0.838	D	+ 0.028*
		PM	0.864	D	0.902	E	+ 0.038*
8.	Corbin Avenue & Plummer Street	AM	0.894	D	0.975	E	+ 0.081*
		PM	0.837	D	0.897	D	+ 0.060*
9.	Corbin Avenue & Prairie Street	AM	0.667	B	0.920	E	+ 0.186*
		PM	0.570	A	0.672	B	+ 0.102
10.	Corbin Avenue & Nordhoff Place	AM	0.393	A	0.464	A	+ 0.071
		PM	0.564	A	0.599	A	+ 0.035
11.	Corbin Avenue & Nordhoff Street./Nordhoff Way	AM	0.823	D	0.842	D	+ 0.019
		PM	0.728	C	0.761	B	+ 0.033

\* Indicates significant impact  
**SOURCE:** Overland Traffic Consultants, Inc., August 2014.

### Utilities (Wastewater, Water Supply, Solid Waste, Electricity and Natural Gas)

**Wastewater** - This alternative would eliminate the residential component, and would therefore reduce wastewater generation (to 127,710 GPD). No mitigation measures are necessary to reduce impacts; as with the project, impacts of the alternative would be less than significant.

**Water** - Eliminating the residential component would reduce water demand (to 102,168 GPD).<sup>9</sup> As with the project, impacts would be reduced to less than significance with the implementation of **Regulatory Compliance Measures RC-III.L-1 through RC-III.L-6**.

**Solid Waste** - This alternative would generate less solid waste (1,430 pounds per day [i.e., 5,108 pounds per day minus 62 percent diversion]). Impacts would be less than the proposed project and could be further reduced with the implementation of **Regulatory Compliance Measures RC-III.L-7 through RC-III.L-9**. As with the project, impacts of the alternative would be less than significant.

**Energy** – This alternative would have different demand for energy as compared to the project energy (14,558,940 KWh per year and 2,469,060 cubic feet per month of natural gas). Impacts

<sup>9</sup> GPD for landscaping requirements are not known, but are assumed to be in the range of 10 percent of the total demand.

would be higher for electricity and lower for natural gas, as compared to the proposed project. Similar to the proposed project, impacts could be reduced with **Project Design Feature PDF-III.L-1, Regulatory Compliance Measures RC-III.L-10** through **RC-III.L-12**, and **Mitigation Measure MM-III.L-1**. As with the project, impacts of the alternative would be less than significant.

### **Relationship of the Alternative to Project Objectives**

Similar to the No Project/Rehabilitate Existing Building Alternative, this alternative would only partially meet one of the six project objectives -- to creatively reuse/repurpose the former Los Angeles Times printing facility as a corporate headquarters, while serving as a significant employer in the Chatsworth-Porter Ranch Community Plan area, and greater San Fernando Valley. It would not preserve the LA Times building, provide a mix of uses, and while the building would be required to incorporate sustainable elements (to reduce energy consumption and comply with Title 24), it would not incorporate a mix of uses and transit plaza to reduce regional trips. Housing units would not be provided to reduce the jobs/housing imbalance as called for by the Housing Element.

### **Conclusion**

While this alternative would be consistent with the Site's existing General Plan designation and zoning, it would not result in sustainable development consistent with more recent planning guidance calling for mixed-use (SB 375 and the 2012-2035 Regional Transportation Plan). This alternative would generate substantially greater traffic than the project and would have greater impacts on local intersections as compared to the project. Unlike the project, this alternative would have significant impacts on NOx emissions under the future plus project condition. Also, without a mix of uses to reduce trips, the project would result in greater impacts on GHG and would not reduce emissions sufficiently compared to BAU to meet AB 32 mandates and would therefore this alternative would have a significant impact on GHG emissions. Noise impacts of this alternative would be greater but still less than significant. Impacts to biological resources, geological resources and hydrology would be similar to the project and less than significant. This alternative would generally reduce demand for public services and utilities compared to the project (although this alternative could demand more electricity than the project). This alternative would only partially meet one of the six project objectives.

## **F. ALTERNATIVE 3 – REDUCED DENSITY/REDUCED HEIGHT ALTERNATIVE – 594 RESIDENTIAL UNITS**

This alternative would develop the site with a mixed-use project similar to the proposed project but with one fewer levels of housing (reducing the heights of the buildings to a maximum of six stories rather than seven). This alternative would include 594 rental housing units (compared to 700 units with the project) in four buildings of comparable footprints (but one less story) and site location to the project, and would similarly utilize the former L.A. Times print facility building as the same integrated light industrial, MGA corporate headquarters with additional leased creative office space (255,815 square feet), as well as 14,000 square feet of retail and restaurant space elsewhere on the site. This alternative would have 263 one-bedroom units, 312 two-bedroom units and 19 three-bedroom units (as compared to the project with 304 one-bedroom units, 372 two-bedroom units and 24 three-bedroom units). This alternative would result in a total built-out area of 1,070,515 square feet (as compared to 1,212,515 square feet with the project) and an FAR of 1.08 (as compared to 1.22 for the project). This alternative would include 1,386 parking

spaces (as compared to 1,467 with the project). Access, including a bridge from Winnetka over the adjacent flood control channel, would be unchanged from the project. As with the project, this alternative would include a transit plaza on the northern part of the site.

All the regulatory compliance measures that apply to the project as well as the mitigation measures would apply to this alternative unless otherwise noted.

**Figure V-3** provides a site plan of this alternative and **Figure V-4** provides an axonometric drawing of this alternative.

### **Impact Comparison**

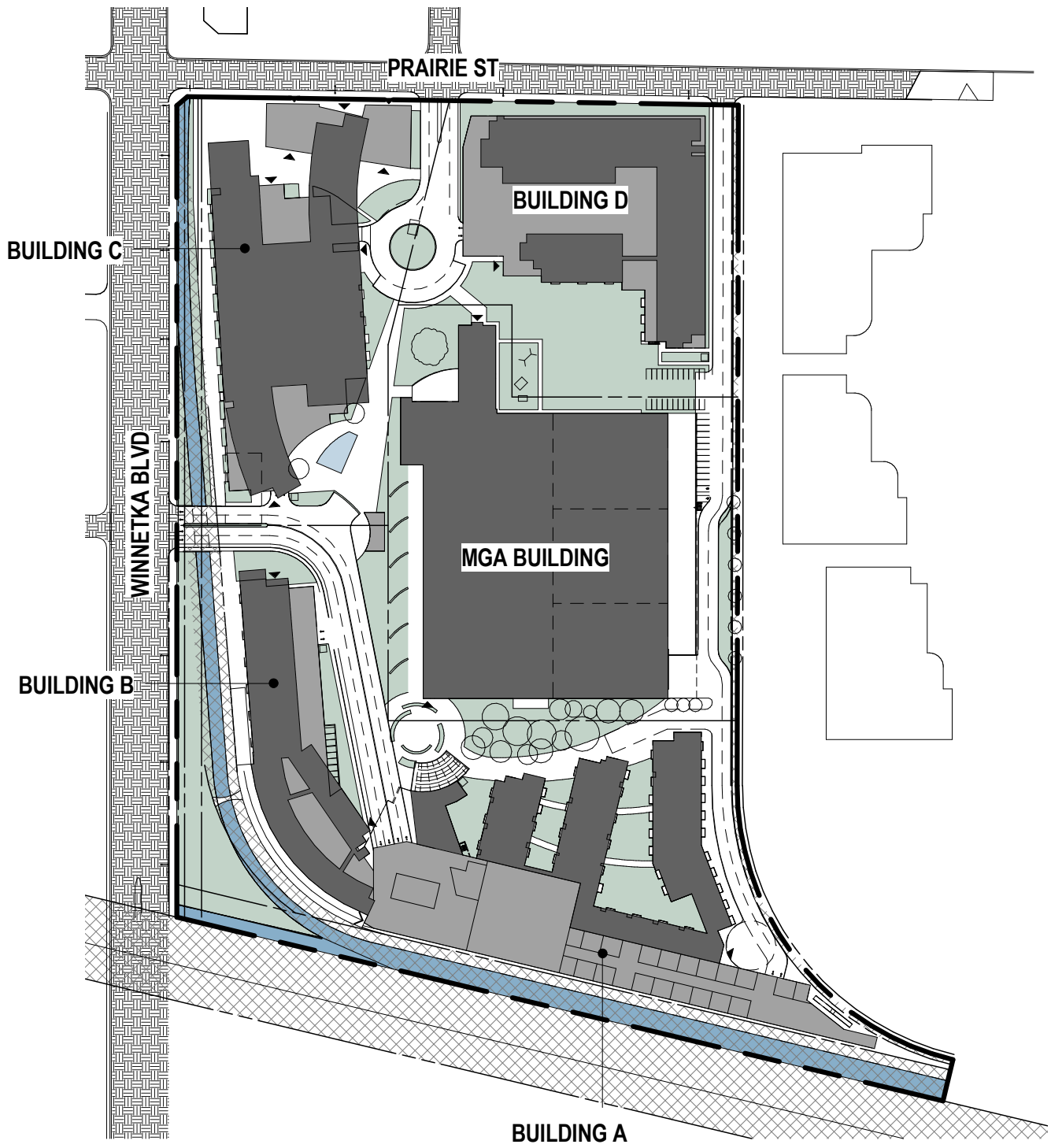
The following environmental impacts would be expected under the Reduced Height/Reduced Density Alternative. The respective Environmental Setting discussions for each area of potential impact are addressed in detail throughout Section III, Environmental Impact Analysis, of this EIR.

#### *Aesthetics and Visual Resources*

This alternative would be similar in design to the project, with the exception that the maximum height of the residential buildings would be six stories rather than seven. This reduction in height would slightly reduce the impact on aesthetics as compared to the project. (Although, the proposed project would not block views or result in an adverse impact on visual quality.) As with the proposed project, the alternative would be visually compatible with surrounding uses and enhance the visual character of the site by creating a campus like setting with associated open space, resident amenities and design themes. As with the project, the alternative, which would have less developed area and height, would not have a significant lighting or shading impact. This alternative would also have a less than significant impact to Aesthetics that would be slightly reduced compared to the project.

#### *Air Quality*

Under this alternative, daily construction activity and intensity (e.g., heavy-duty equipment use) would be similar to the proposed project. Total emissions would be less due to a reduction in residential units. However, the significance thresholds are based on pounds per day of emissions, which would be similar to the emissions presented in **Table III.B-5**. Similar to the proposed project, this alternative would include the application of new architectural coatings. It is anticipated that unmitigated VOC emissions would exceed the SCAQMD regional significance threshold. This impact would be eliminated with the implementation of Mitigation Measure MM-III.B-1, which requires architectural coatings with a volatile organic compound content of 30 grams per liter or less.

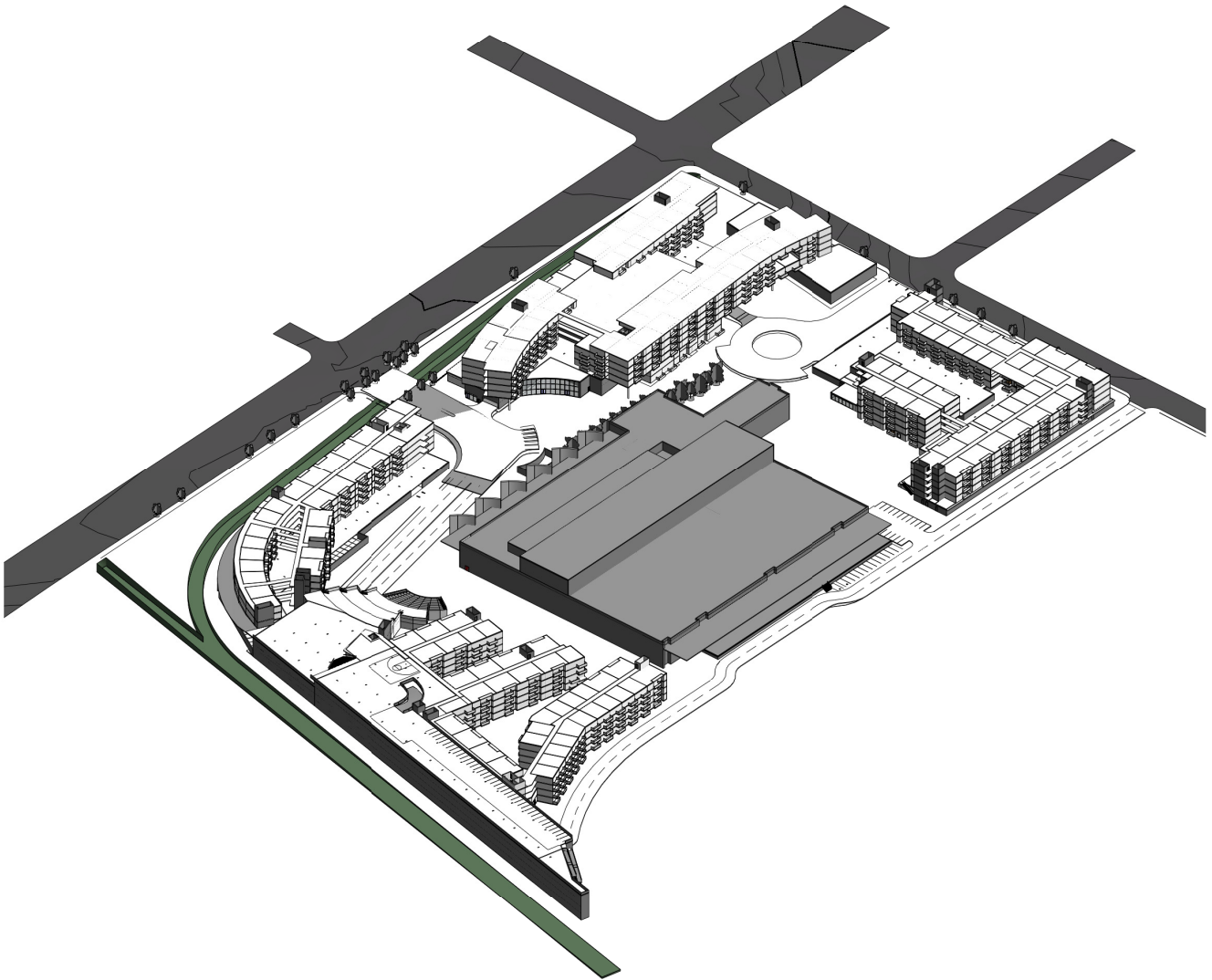


SOURCE: Killefer Flammang Architects, 2014

MGA Mixed-Use Campus Project ■

**Figure V-3**

Alternative 3 - Reduced Density and Reduced Height Site Plan



SOURCE: Killefer Flammang Architects, 2014

MGA Mixed-Use Campus Project ■

**Figure V-4**

Alternative 3 - Reduced Density and Reduced Height Axonometric View

Regional operational emissions without mitigation are presented in **Table V-12**. Similar to the proposed project, unmitigated emissions would exceed the NO<sub>x</sub> significance threshold under future plus project conditions. Total emissions would be greater than the SCAQMD significance thresholds due to an increase in residential development and associated average daily trips. Therefore, operational activity under this alternative would result in an unmitigated significant regional air quality impact.

Similar to the proposed project, this alternative would include Project Design Features and Mitigation Measures to reduce energy use and average daily trips. Mitigated regional emissions are presented in **Table VI-13**. Mitigated emissions would not exceed the NO<sub>x</sub> significance threshold under future plus project conditions. Therefore, operational activity under this alternative would not result in a significant and unavoidable regional air quality impact.

Regarding localized CO concentrations, the concentrations estimated using proposed project traffic were approximately 10 percent of the State standards. Concentrations would be well below the State standards when considering a nine percent increase in traffic. In addition, it is not anticipated that the land use would generate substantial truck trips resulting significant toxic air contaminant emissions, or include significant sources of odors.

TABLE V-12 ESTIMATED DAILY OPERATIONS EMISSIONS – REDUCED DENSITY AND HEIGHT ALTERNATIVE (UNMITIGATED)						
Emission Source	Pounds per Day					
	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>2.5</sub>	PM <sub>10</sub>
<b>FUTURE WITH ALTERNATIVE 3 CONDITIONS (2019)</b>						
Area Source	23	3	50	<1	1	1
Mobile Source	7	57	178	1	4	8
<b>Total</b>	<b>30</b>	<b>60</b>	<b>228</b>	<b>1</b>	<b>5</b>	<b>9</b>
<b>SCAQMD Threshold</b>	<b>55</b>	<b>55</b>	<b>550</b>	<b>150</b>	<b>55</b>	<b>150</b>
Exceed Threshold?	No	Yes	No	No	No	No
<b>SOURCE:</b> Terry A. Hayes Associates Inc., 2014.						

TABLE VI-13 ESTIMATED DAILY OPERATIONS EMISSIONS – REDUCED DENSITY AND HEIGHT ALTERNATIVE (WITH PDF AND MITIGATION)						
Emission Source	Pounds per Day					
	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>2.5</sub>	PM <sub>10</sub>
<b>FUTURE WITH ALTERNATIVE 3 CONDITIONS (2019) - MITIGATED</b>						
Area Source	23	3	50	<1	1	1
Mobile Source	6	45	142	1	3	6
<b>Total</b>	<b>29</b>	<b>48</b>	<b>192</b>	<b>1</b>	<b>4</b>	<b>7</b>
<b>SCAQMD Threshold</b>	<b>55</b>	<b>55</b>	<b>550</b>	<b>150</b>	<b>55</b>	<b>150</b>
Exceed Threshold?	No	No	No	No	No	No
<b>SOURCE:</b> Terry A. Hayes Associates Inc., 2014.						

### *Biological Resources*

This alternative would have similar impacts and be required to comply with the same impacts as the project. This alternative would result in removal of the same number of trees and would result in the same replacement trees and similar landscaping as the project, given the same general footprint and design of new construction. As with the project, the alternative would not result in the conversion of plant communities or wildlife habitat. Therefore, as with the project, impacts to biological resources would be less than significant.

### *Geology and Soils*

This alternative would result in similar impact with respect to geology and soils as the project. The alternative would be subject to the same geologic, seismic and soils conditions as the project, but with 106 fewer on-site units, fewer people would be exposed to shaking in a seismic event. This alternative would be required to comply with the project-specific geotechnical report. As with the project, impacts would be less than significant.

### *Greenhouse Gases*

GHG emissions were estimated for BAU and the Reduced project. BAU emissions were based on 2008 Building Energy Standards, which were used by CARB to establish the AB 32 reduction goals. The analysis includes implementation of 2013 Building Energy Standards, as required by Title 24 regulations. **Table V-14** presents GHG emissions for BAU and Alternative 3 without project design features and mitigation. Alternative 3 would generate 5.1 percent fewer emissions than the BAU analysis for future plus project scenarios. The reductions would result from the implementation of 2013 Building Energy Standards. Without Project Design Features to reduce GHG, this alternative would not meet the 15.3 percent BAU requirement necessary to achieve AB 32 mandates.

**PDF-III.B-1** would reduce energy use beyond 2013 Building Energy Standards through the implementation of higher efficiency items. The project includes Project Design Features (**PDF-III.K-2** and **PDF-III.K-3**) such as shuttles and a Transit Demand Management Program that would reduce VMT.



TABLE V-14 GHG EMISSIONS – REDUCED DENSITY AND HEIGHT ALTERNATIVE (WITHOUT PDF OR MITIGATION)			
Source	Carbon Dioxide Equivalent (Metric Tons Per Year)		
	BAU	Reduced Project Alternative	Percent Reduction
<b>FUTURE WITH ALTERNATIVE 3 CONDITIONS (2019)</b>			
<b>ONE-TIME EMISSIONS</b>			
Construction	145	145	0%
<b>BUILDOUT EMISSIONS</b>			
Non-Residential Energy	1,354	1,179	13%
Residential Energy	2,134	1,785	16%
Non-Building Energy (e.g., Parking Lights)	497	282	43%
Water Cycle Energy	645	645	0%
Solid Waste Energy	261	261	0%
Mobile Sources	9,359	9,359	0%
Landscaping Maintenance	179	179	0%
<b>TOTAL</b>	<b>14,573</b>	<b>13,835</b>	<b>5.1%</b>
<b>SOURCE:</b> Terry A. Hayes Associates Inc., 2014.			

As for the proposed project Alternative 3 would reduce average daily trips in part due to having a mix of land uses. **Table V-15** present GHG emissions for BAU and Alternative 3 with identified project design features and mitigation. With project design features and mitigation, Alternative 3 would generate 18.6 percent fewer emissions than the BAU analysis for the future plus project scenarios. The reductions would result from exceeding 2013 Building Energy Standards, inclusion of solar power, the mix of uses, shuttles and TDM. The GHG reductions would exceed the 15.3 percent BAU requirement necessary to achieve AB 32 mandates. Therefore, Alternative 3 would result in a less than significant impact related to GHG emissions and consistency with GHG reduction plans.

TABLE V-15 GHG EMISSIONS – REDUCED DENSITY AND HEIGHT ALTERNATIVE (WITH PDF AND MITIGATION)			
Source	Carbon Dioxide Equivalent (Metric Tons Per Year)		
	BAU	Alternative 3	Percent Reduction
<b>FUTURE WITH ALTERNATIVE 3 CONDITIONS (2019)</b>			
<b>ONE-TIME EMISSIONS</b>			
Construction	145	145	0%
<b>BUILDOUT EMISSIONS</b>			
Non-Residential Energy	1,354	1,179	13%
Residential Energy	2,134	1,785	16%
Non-Building Energy (e.g., Parking Lights)	497	282	43%
Water Cycle Energy	645	645	0%
Solid Waste Energy	261	261	0%
Mobile Sources	9,359	7,470	20%
Landscaping Maintenance	179	179	0%
Solar Panels	-	(76)	-
<b>TOTAL</b>	<b>14,573</b>	<b>11,870</b>	<b>18.6%</b>
<b>SOURCE:</b> Terry A. Hayes Associates Inc., 2014.			

### *Hazards and Hazardous Materials*

As for the project, impacts associated with hazards and hazardous materials would be less than significant for the Reduced Project Alternative. As for the project, compliance with existing regulations would ensure that any existing on-site hazardous materials are handled and removed in a manner that would result in a less than significant impact.

### *Hydrology and Water Quality*

Under this alternative, impacts to hydrology and water quality, would be similar to those described for the project in Section **IV.G Hydrology & Water Quality**. In its current condition, the site is completely developed (68% impervious surfaces). This alternative would have similar impervious surfaces as compared to the project (74%) as building footprints and developed areas within the site would be essentially unchanged. Similar to the proposed project, development under this alternative would be subject to the SUSMP requirements and would be required to not increase stormwater flows, as well as presumably similarly developed to LID standards. Therefore, as with the proposed project, impacts to hydrology and water quality would be less than significant.

### *Land Use and Planning*

This alternative would be similar to the project in that it would contain a similar mix of uses (but at a lower density and 106 fewer residential units), similar site layout and amenities and would allow for the continuation of light industrial use. Consequently, as with the proposed project, this alternative would similarly provide housing, employment and transit opportunities and be consistent with General Plan elements and regional plan goals and objectives. As with the project, land use impacts would be less than significant.

### *Noise and Vibration*

Under this alternative, the overall amount of new construction would be incrementally reduced when compared to the proposed project. However, peak daily noise and vibration associated with construction equipment and construction activities would be similar to those of the proposed project. Accordingly, as with the proposed project, construction noise and vibration impacts would continue to be less than significant.

Regarding operational activity, this alternative would generate fewer average daily vehicle trips than the proposed project. This alternative would generate less mobile noise than the proposed project, and would also result in a less-than-significant mobile noise impacts. It is anticipated that the site design would be similar to the proposed project, and mechanical equipment (e.g., air conditioning units) and parking activity would also result in less-than-significant noise and vibration impacts. Similar to the proposed project, without mitigation, this alternative would expose new residential buildings to significant noise levels from passing trains, although fewer units would be affected as compared to the project. This impact would be eliminated with the implementation of **Mitigation Measure MM-N-1**, which requires materials used in the construction of residential units facing the rail tracks.

*Public Services (Fire and Police Protection, Schools, Parks and Libraries)*<sup>10</sup>

Impacts for this alternative would be similar to the proposed project and previously described in Section III.J (Public Services) for both construction and operation with the following exceptions:

Fire Protection – Although this alternative would reduce the number of residential units from 700 to 594, it would still generate residential demand for fire protection. As with the project, the alternative would not cause a substantial adverse physical impact on fire protection facilities or the need for new or physically altered fire protection facilities in order to maintain acceptable response times. Impacts would be similar to the proposed project and would be reduced with the implementation of **Regulatory Compliance Measures RC-III.J-1 through RC-III.J-9**. Impacts would be less than significant, as with the project.

Police Protection - Although this alternative would reduce the number of residential units from 700 to 594, it would still generate residential demand for police protection. As with the project, the alternative would not cause a substantial adverse physical impact on police protection facilities or the need for new or physically altered police protection facilities in order to maintain acceptable service ratios or response times. Implementation of **Project Design Features PDF-II.J-1 through PDF-III.J-3, Regulatory Compliance Measures RC-III.J-10 through RC-III.J-14 and Mitigation Measures MM-III.J-1 through MM-III.J-3** would reduce impacts to a less than significant level.

Schools - Uses under this alternative would generate approximately 166 students, 30 less than the project. Impacts would be generally similar to the proposed project and could similarly be reduced to less than significant with the implementation of **Regulatory Compliance Measure RC-III.J-15**.

Parks - Impacts of this alternative would generally be similar to the proposed project although slightly reduced with fewer units and the same open space impacts. Therefore with fewer units and the same open space, impacts to open space off-site should be less. Impacts would be reduced with the implementation of **Regulatory Compliance Measures RC-III.J-16 and RC-III.J-17**, and as with the proposed project, would be less than significant.

Libraries - Although this alternative would reduce the number of residential units from 700 to 594, it would still generate residential demand for libraries. Impacts would be slightly less than the proposed project and would similarly be reduced to a less than significant level with the implementation of **Mitigation Measure MM-III.J-1**.

*Transportation and Circulation*

The Reduced Density/Reduced Height Alternative would have less traffic impact as compared to the proposed project as a result of 106 fewer units.

**Table V-16** provides trip generation for the Reduced Project Alternative and **Table V-17** shows intersection impacts before mitigation. The same mitigation measures as the project would be applied which would result in the same significant impacts as the project (two intersections -- Corbin Avenue and Plummer Street during the PM peak hour; and Corbin Avenue and Prairie Street during the AM peak hour).

<sup>10</sup> The total number of residents generated by this alternative is unknown since the residential unit mix, including number of bedrooms is not known.

TABLE V-16 REDUCED DENSITY AND HEIGHT ALTERNATIVE - TRIP GENERATION								
Reduced Density and Height Alternative	Size	Daily	AM Peak Hour			PM Peak Hour		
			Total	In	Out	Total	In	Out
Corporate Headquarters	212,815 SF	2,347	332	292	40	317	54	263
Office	43,000 SF	474	67	59	8	64	11	53
Retail	11,000 SF	470	11	7	4	41	20	21
Restaurant	3,000 SF	381	31	18	14	30	18	12
Restaurant Pass By (50%)	- 50%	-76	- 6	- 3	- 3	- 6	- 4	- 2
Retail Pass by Adjustment (50%)	- 50%	- 94	- 5	- 3	- 2	- 20	- 10	- 10
Apartments	594 units	3,950	303	61	242	368	239	129
<b>Project Total</b>		<b>7,452</b>	<b>734</b>	<b>431</b>	<b>303</b>	<b>794</b>	<b>328</b>	<b>466</b>

**SOURCE:** Overland Traffic Consultants. January 2014.

TABLE V-17 FUTURE TRAFFIC CONDITIONS WITH AND WITHOUT REDUCED DENSITY AND HEIGHT ALTERNATIVE							
No.	Intersection	Peak Hour	Future Without Alternative		Future With Alternative 3		Alternative 3 Impact
			CMA	LOS	CMA	LOS	
1.	Mason Avenue & Plummer Street	AM	0.808	D	0.823	D	+ 0.015
		PM	0.792	C	0.807	D	+ 0.015
2.	Winnetka Avenue & Lassen Street	AM	0.616	B	0.650	B	+ 0.034
		PM	0.553	A	0.593	A	+ 0.040
3.	Winnetka Avenue & Plummer Street	AM	0.600	A	0.624	B	+ 0.024
		PM	0.459	A	0.499	A	+ 0.040
4.	Winnetka Avenue & Prairie Street	AM	0.397	A	0.429	A	+ 0.032
		PM	0.445	A	0.544	A	+ 0.099
5.	Winnetka Avenue & Nordhoff Street	AM	0.839	D	0.888	D	+ 0.049*
		PM	0.758	C	0.792	C	+ 0.034
6.	Winnetka Avenue & Parthenia Street	AM	0.819	D	0.858	D	+ 0.039*
		PM	0.781	C	0.803	D	+ 0.022*
7.	Winnetka Avenue & Roscoe Boulevard	AM	0.810	D	0.829	D	+ 0.019
		PM	0.864	D	0.881	D	+ 0.017
8.	Corbin Avenue & Plummer Street	AM	0.894	D	0.929	E	+ 0.035*
		PM	0.837	D	0.871	D	+ 0.034*
9.	Corbin Avenue & Prairie Street	AM	0.667	B	0.819	D	+ 0.085*
		PM	0.570	A	0.651	B	+ 0.081
10.	Corbin Avenue & Nordhoff Place	AM	0.393	A	0.416	A	+ 0.023
		PM	0.564	A	0.579	A	+ 0.015
11.	Corbin Avenue & Nordhoff Street./Nordhoff Way	AM	0.823	D	0.834	D	+ 0.011
		PM	0.728	C	0.742	C	+0.014

\* Indicates significant impact  
**SOURCE:** Overland Traffic Consultants, Inc., August 2014.

*Utilities (Wastewater, Water Supply, Solid Waste, Electricity and Natural Gas)*

Impacts for this alternative would be similar to the proposed project and previously described in Section III.L (Utilities and Service Systems) for both construction and operation with the following exceptions:

Wastewater - This alternative would reduce the number of residential units from 700 to 594, and would therefore generate approximately 15 percent less wastewater from residential use on the site. Impacts would be similar, though somewhat reduced compared to the proposed project. No mitigation measures are necessary to reduce impacts; and as with the project, impacts would be less than significant.

Water - This alternative would reduce the number of residential units from 700 to 594, and would therefore reduce demand for water from the residential component of the project by approximately 15 percent. Impacts would be similar, but somewhat reduced, compared to the proposed project. As with the project, with adherence to **Regulatory Compliance Measures RC-III.L-1** through **RC-III.L-6** would impacts would be less than significant.

Solid Waste – With fewer residential units, this alternative would generate less solid waste (approximately 15 percent less from the residential portion of the site). Impacts would be similar to the proposed project and could be reduced to a less than significant level with the implementation of **Regulatory Compliance Measures RC-III.K-7** through **RC-III.K-9**.

Energy – With reduced residential units this alternative would generate less demand for energy. Impacts would be similar to the proposed project, though reduced approximately 15 percent for the residential component, and would be less than significant with the implementation of **Project Design Feature PDF-III.L-1**, **Regulatory Compliance Measures RC-III.L-10** through **RC-III.L-12**, and **Mitigation Measure MM-III.L-1**.

### **Relationship of the Alternative to Project Objectives**

Alternative 3 Reduced Project would meet all of the project objectives, but by providing 106 fewer housing units, Alternative 3 Reduced Project would not meet the objective to provide rental housing in response to demand, to the same extent as the project.

### **Conclusion**

Alternative 3 would reduce impacts compared to the project (as a result of 106 fewer housing units) but would still meet all project objectives (although it would not meet the objective to provide rental housing to the same extent as the project). The significant impact to two intersections would remain but would be less severe than under the project.

## **H. ENVIRONMENTALLY SUPERIOR ALTERNATIVE**

Section 15126.6(e)(2) of the CEQA Guidelines requires that an environmentally superior alternative be identified among the analyzed alternatives. From a strictly environmental standpoint, the No Project/Rehabilitate Existing Building Alternative (Alternative 1) could increase traffic impacts as compared to the project because mitigation may not occur; also construction air quality could result in significant impacts without mitigation. Without a mix of

uses this alternative while it would reduce GHG emissions compared to the project, may not quite meet AB 32 emission targets. The rehabilitation of existing buildings is a strategy for reducing GHG emissions associated with new development as building reuse generates fewer construction exhaust emissions and life-cycle emissions associated with building materials. However, in this case, the rehabilitation and occupation of the existing building would not include the same GHG-reduction features as the proposed project (e.g., mix of land uses leading to VMT reductions). All other impacts would be reduced compared to the project. However, this alternative, would only meet one of the six project objectives.

Alternative 2 General Plan/Zoning Compliant Alternative, would reduce the (less than significant) land use impact of introducing residential use to a corporate office use, but would not respond to Housing Element polices calling for more housing or state and regional policies calling for a mix of uses to reduce trips and increase sustainability. Also, this alternative would substantially increase traffic.

Alternative 3 Reduced Density/Reduced Height Alternative, with one story less in maximum height (six stories as opposed to seven with the project) and 106 fewer residential units (594 as compared to 700), would have similar impacts as compared to the project, on land use, biological resources, geology and soils, hazardous materials. Compared to the project, Alternative 3 Reduced Density Reduced Height would incrementally reduce impacts on aesthetics, air quality, noise, traffic, and public services and utilities as compared to the project (as for the project, impacts to two intersections, while reduced, would still be significant). GHG impacts would still meet reduction targets, but to a lesser extent as compared to the project.

Based on the analysis described in this section, including the ability to meet project objectives, Alternative 3 would be considered the environmentally superior alternative because it reduces most impacts as compared to the project and unlike Alternative 2, does not introduce new significant impacts (Alternative 2 would result in additional intersections being impacted).

**Table V-17** provides a summary comparison of the proposed project and each of the three alternatives analyzed in this EIR. The table indicates the significance levels for each of the environmental issue areas analyzed in this EIR and denotes whether the impacts are less than, comparable to, or greater than the proposed project's impact. It also indicates whether mitigation would be required and whether the alternative would avoid a significant project impact.

TABLE V-18 PROJECT/ALTERNATIVES IMPACT COMPARISON SUMMARY				
ENVIRONMENTAL IMPACT	PROPOSED PROJECT	NO PROJECT -- ALTERNATIVE 1	GENERAL PLAN/ZONING COMPLIANT ALTERNATIVE 2	REDUCED DENSITY AND HEIGHT ALTERNATIVE 3
		<i>No Project/Rehabilitate Existing Building</i>	<i>New Light Industrial Building</i>	<i>Reduced Project (594 Residential units)</i>
<b>AESTHETICS</b>				
<i>Visual Character</i>	Less than Significant	Less <i>No Impact</i>	Different Development Type <i>Less than Significant</i>	Less <i>Less than Significant</i>
<i>Shading/Lighting</i>	Less than Significant	Less <i>Less than Significant</i>	Less <i>Less than Significant</i>	Comparable <i>Less than Significant</i>
<b>AIR QUALITY</b>				
<i>Construction</i>	Less than Significant with Mitigation	<b>Greater Significant and Unavoidable</b>	Less <i>Less than Significant</i>	Less <i>Less than Significant</i>
<i>Operation</i>	Less than Significant	Less <i>Less than Significant</i>	Greater <i>Less than Significant</i>	Less <i>Less than Significant</i>
<b>BIOLOGICAL RESOURCES</b>				
<i>Habitat Removal, Introduction of Invasive Species, Native Trees</i>	Less than Significant with Mitigation	Less <i>Less than Significant with Regulatory Compliance</i>	Greater <i>Less than Significant</i>	Comparable <i>Less than Significant</i>
<b>GEOLOGY</b>				
<i>Grading</i>	Less than Significant with Mitigation	Less <i>No Impact</i>	Comparable <i>Less than Significant with Mitigation</i>	Comparable <i>Less than Significant with Mitigation</i>
<i>Seismic</i>	Less than Significant with Mitigation	Less <i>Less than Significant</i>	Comparable <i>Less than Significant with Mitigation</i>	Comparable <i>Less than Significant with Mitigation</i>
<b>GREENHOUSE GAS EMISSIONS</b>	Less than Significant with Mitigation	Greater <sup>11</sup> <i>Less than Significant</i>	Greater <i>Less than Significant with Mitigation</i>	Comparable <i>Less than Significant with Mitigation</i>

<sup>11</sup> While GHG emissions of the No Project Alternative would be less than the proposed project, it would reduce emissions compared to Business as Usual by a lower percentage than the project.

<b>TABLE V-18 PROJECT/ALTERNATIVES IMPACT COMPARISON SUMMARY</b>				
<b>ENVIRONMENTAL IMPACT</b>	<b>PROPOSED PROJECT</b>	<b>NO PROJECT -- ALTERNATIVE 1</b>	<b>GENERAL PLAN/ZONING COMPLIANT ALTERNATIVE 2</b>	<b>REDUCED DENSITY AND HEIGHT ALTERNATIVE 3</b>
		<i>No Project/Rehabilitate Existing Building</i>	<i>New Light Industrial Building</i>	<i>Reduced Project (594 Residential units)</i>
HAZARDOUS MATERIALS	Less than Significant with Mitigation	Comparable <i>Less than Significant with Mitigation</i>	Comparable <i>Less than Significant with Mitigation</i>	Comparable <i>Less than Significant with Mitigation</i>
HYDROLOGY AND WATER QUALITY				
<i>Hydrology</i>	Less than Significant with Mitigation	Less <i>Less than Significant with Regulatory Compliance</i>	Comparable <i>Less than Significant with Mitigation</i>	Comparable <i>Less than Significant with Mitigation</i>
<i>Water Quality</i>	Less than Significant with Mitigation	Less <i>Less than Significant with Regulatory Compliance</i>	Comparable <i>Less than Significant with Mitigation</i>	Less <i>Less than Significant with Mitigation</i>
LAND USE AND PLANNING	Less than Significant	Less <i>No Impact</i>	Less <i>Less than Significant</i>	Less <i>Less than Significant</i>
NOISE				
<i>Construction</i>	Less than Significant	Less <i>No Impact</i>	Comparable <i>Less than Significant</i>	Comparable <i>Less than Significant</i>
<i>Operation</i>	Less than Significant with Mitigation	Less <i>Less than Significant</i>	Comparable <i>Less than Significant</i>	Comparable <i>Less than Significant with Mitigation</i>
PUBLIC SERVICES				
<i>Fire</i>	Less than Significant with Mitigation	Less <i>No Impact</i>	Comparable <i>Less than Significant with Mitigation</i>	Less <i>Less than Significant with Mitigation</i>
<i>Police</i>	Less than Significant with Mitigation	Less <i>No Impact</i>	Less <i>Less than Significant with Mitigation</i>	Less <i>Less than Significant with Mitigation</i>
<i>Schools</i>	Less than Significant with Mitigation	Less <i>No Impact</i>	Less <i>Less than Significant with Mitigation</i>	Less <i>Less than Significant with Mitigation</i>



TABLE V-18 PROJECT/ALTERNATIVES IMPACT COMPARISON SUMMARY				
ENVIRONMENTAL IMPACT	PROPOSED PROJECT	NO PROJECT -- ALTERNATIVE 1  <i>No Project/Rehabilitate Existing Building</i>	GENERAL PLAN/ZONING COMPLIANT ALTERNATIVE 2  <i>New Light Industrial Building</i>	REDUCED DENSITY AND HEIGHT ALTERNATIVE 3  <i>Reduced Project (594 Residential units)</i>
<i>Parks</i>	Less than Significant With Mitigation	Less <i>No Impact</i>	Less <i>Less than Significant</i>	Less <i>Less than Significant</i>
<i>Libraries</i>	Less than Significant	Less <i>No Impact</i>	Less <i>Less than Significant</i>	Less <i>Less than Significant</i>
TRANSPORTATION				
<i>Traffic</i>	<b>Significant and Unavoidable</b>	<b>Greater Significant and Unavoidable</b>	<b>Greater Significant and Unavoidable</b>	<b>Less Significant and Unavoidable</b>
UTILITIES				
<i>Wastewater</i>	Less than Significant with Mitigation	Less <i>Less than Significant with Regulatory Compliance</i>	Less Less than Significant with Mitigation	Less Less than Significant with Mitigation
<i>Water</i>	Less than Significant with Mitigation	Less <i>Less than Significant with Regulatory Compliance</i>	Less Less than Significant with Mitigation	Less Less than Significant with Mitigation
<i>Solid Waste</i>	Less than Significant with Mitigation	Less <i>Less than Significant with Regulatory Compliance</i>	Less Less than Significant with Mitigation	Less Less than Significant with Mitigation
<i>Electricity</i>	Less than Significant with Mitigation	Less <i>Less than Significant with Regulatory Compliance</i>	Less Less than Significant with Mitigation	Less Less than Significant with Mitigation
<i>Natural Gas</i>	Less than Significant with Mitigation	Less <i>Less than Significant with Regulatory Compliance</i>	Less Less than Significant with Mitigation	Less Less than Significant with Mitigation