

SECTION VIII
**ALTERNATIVES TO
THE PROPOSED ACTION**

SECTION VII ALTERNATIVES TO THE PROPOSED ACTION

INTRODUCTION

The California Environmental Quality Act (CEQA) requires the identification and evaluation of reasonable alternatives designed to achieve the project's objectives, while reducing the significant impacts of the project. (Guidelines Section 15126, sub.(d)) The CEQA Guidelines discuss the intent and extent of alternatives analysis to be provided in an EIR. These considerations are summarized below.

Reasons for Alternatives Analysis

Under the CEQA Guidelines (section 15151), an environmental impact report must be prepared with sufficient information to enable decision-makers to make an intelligent decision, taking into account the environmental consequences of the proposed action. Generally, a description of reasonable alternatives to the project, or an alternate project site, is required in an EIR (CEQA Guidelines, section 15128(d), as part of the process of providing sufficient information. The environmental effects of the alternative scenarios need not be as thorough or detailed as the analysis of the proposed project itself. Pursuant to section 15126(d) of the CEQA Guidelines, the discussion of the alternatives should also identify the environmentally superior alternative and explain why the other alternatives were rejected in favor of the proposed project. The intent of the alternatives analysis is to ensure that other possible approaches, to avoid or reduce environmental impacts, were considered. The merits of the alternatives and how they compare to the project offer valuable information to the decision-makers.

Number of Alternatives to be Evaluated

Neither the CEQA statutes, the Guidelines, nor recent court cases specify a precise number of alternatives required to be discussed in an EIR. CEQA does however state that an alternative defined as the "no project alternative" must be included, and when appropriate, an alternative potentially feasible site location. Other project alternatives may involve a modification of the proposed land uses or other project elements at the same project location.

Criteria for Establishing Alternatives

Alternatives should be selected on the basis of their ability to achieve the objectives of the project while reducing its significant environmental effects. The potential to mitigate *significant* project-related impacts and to reasonably inform the decision-maker of the potential merits of various approaches, are the primary considerations in the selection and evaluation of alternatives.

Interpretation of CEQA implies that alternatives selected for discussion in the EIR should be those that could feasibly attend to the basic needs of the project, considering economic, environmental, social and technological factors. Further, alternatives that are remote or speculative, or whose effects cannot be reasonably predicted, are not required to be considered.

Finally, the discussion of alternatives need not be exhaustive, only reasonable. Ultimately, the rule of reason applies with respect to guiding the discussion on alternatives.

The City has initiated a Specific Plan which will effectively update and implement the more general goals of the City's existing plans for the project area. The specific plan focuses on standards and development programs that are directly applicable to the specific geographic location and nature of the project area, and consistent with the broader context of general plan/community plan goals. These objectives, along with an overview of the residual significant impacts of the project which are provided in the following subsections, serve as a basis for evaluating project alternatives in this EIR.

Project Intent and Objectives

To fully appreciate the selection of alternatives and then to provide a comparative evaluation, it is important to understand the goals of the ADP. As the ADP is a Specific Plan which focuses primarily on policies to guide specific development proposals which may come forth for this project area, certain alternative aspects, especially with respect to alternate site locations, will not be practical. The project objectives serve as the foundation for addressing: 1) the reasonableness of the alternatives that are included; and 2) the viability of any specific alternative.

The ADP project's intent and objectives are fully discussed in Section II (Project Description) of this document. Also, the objectives are presented in Table 153, Objectives Comparison Matrix, found later in this section.

Significant Impacts to Resolve

Project alternatives should to the extent feasible or possible, alleviate the significant impacts of the proposed project. The EIR analysis for the proposed project found that *significant* impacts would remain, even given reasonable mitigation, in the following areas:

- Aesthetics - viewshed obstruction/historic viewsheds
- Cultural Resources - historical context and preservation
- Transportation - traffic/intersection levels of service access
- Air Quality - emission levels of CO, NO_x, ROC
- Utilities - solid waste generation/disposal

Also, *potentially significant* impacts could remain in the following areas:

- Shade/Shadow - shadowing on adjacent properties
- Public Services - fire protection service demands
police protection service demands

Several of the alternatives selected for analysis in the section are derived, in part, because of their potential ability to result in reduced levels of impacts for one or more of the issue areas identified above.

Alternate Site Criteria

The intent of the "alternate site location" concept is to evaluate whether an alternative site would eliminate any of the significant environmental effects of the project. The decision-makers should consider whether an alternate site would allow for the project objectives to be met while minimizing the potential impacts to the environment. Ideally, the alternate site location selection should be one that would minimize impacts which cannot otherwise be mitigated through other means of mitigation, or would generally result in less significant impacts to the environment.

The use of a different location is a choice characteristically most available to public agencies for certain types of specific public facilities (such as fire stations, storage yards, transportation facilities, utilities and public buildings) in which development of the facility itself, is the primary consideration and its precise location or alignment, within bounds, is secondary. With specific private projects, the same range of latitude is practically not available because of the cost and length of time required to

secure the site-specific prerequisites and entitlement for development, and because a permissible use for a given site is characteristically being sought, rather than the reverse.

The basis for the Specific Plan, and the development of the objectives that relate to it, is partially contingent upon the specific geographic area near Union Station. The stated objectives of the Specific Plan are an outgrowth of social and economic needs, physical circumstances and market opportunities associated with the chosen plan area. It is conceivable that certain locations elsewhere within the City and region could potentially achieve some or all of the intended objectives. However, limited vacant land opportunities of a sizable scale, and within a similar proximity to the downtown civic area, are available. The proposed Specific Plan represents an opportunity to locate existing Los Angeles civic center government and office employees adjacent to an established transit hub. The Specific Plan incorporates the policies of the Central City North Community Plan, as well as regional and state goals addressing air quality and traffic congestion. In addition, the Specific Plan builds upon a significant public investment which has already been made toward these policies. Other opportunities to incorporate employment-related uses within such close proximity to a major Los Angeles multi-modal transit facility are unparalleled.

For the Alternate Site discussion, four potential alternative sites are identified. While other sites may exist, these sites were selected for discussion due primarily to their size, availability, permitted land use and intensity, and previous actions to prepare these sites for development. A brief description of four potential alternate sites follows:

Warner Center - This 924-acre property, located north of Freeway 101 (Ventura Freeway) in the Woodland Hills area, has been the subject of plan development for several decades. The area is currently partially developed but not fully built out. Current preliminary plans, as presented in the Warner Center Specific Plan, propose more than 26 million square feet of non-residential development. Residential development surrounds this area. This site offers the advantage of being a designated employment core but is located outside of the historic context of the downtown civic center area.

Taylor Yard - The Taylor Yard consists of approximately 174 acres located northeasterly of the juncture of the Golden State and Glendale Freeways, between San Fernando Road and the Los Angeles River. This property was previously utilized as a rail storage and service site and is located along a potential transit link. Recent proposals have considered this site as a possible location for a transit station, in association with the Burbank-Glendale-Los Angeles Rail Transit Project. The site is surrounded by residential uses toward the north. While Taylor Yard is in relatively close proximity

to the proposed project area, it is not within a reasonable distance to provide pedestrian level linkage to the downtown area.

Playa Vista - The Playa Vista site is located in west Los Angeles, near the communities of Westminster and Marina del Rey. This approximate 1,087 acre site is located primarily within the City of Los Angeles, with approximately one-quarter of the site within the County of Los Angeles. Also, three quadrants of the site lie within the jurisdiction of the California Coastal Commission. Existing plans for this site include a mixed-use community of approximately 13,000 residential units and over 5 million square feet of office. Also, at least 50 percent of the site would remain, or be restored, to open space.

Cornfield/Bullring - The Cornfield/Bullring site consists of 56 acres, near the vicinity, but somewhat northerly of the proposed ADP site. This site is adjacent to Chinatown and northeast of downtown Los Angeles. The property was previously utilized as a railyard, also known as the SPT Co. site. This site is predominantly located within the Central City North Planning Area, with the remainder in the Silver Lake-Echo Park Planning Area. The site is designated as Light Industrial. This site offers many of the locational and linkage opportunities of the proposed project site, but does not have direct access to the Union Station transit hub, as does the proposed project.

OVERVIEW OF SELECTED ALTERNATIVES

The alternatives considered pursuant to CEQA are: 1) No Project; 2) More Housing; 3) Sports Arena, Urban Entertainment Complex and Housing; 4) Community Plan; 5) Reduced Density/Same Mix; 6) Land Use/Transportation Policy; and 7) Alternate Site Location. Six of the identified alternatives present a reasonable range of development scenarios at the project site. The seventh alternative considers development at other potential locations. The methodology for establishing the alternatives is to consider reasonable alternatives that either: 1) reflect no change (Alternative 1- No Project); 2) represent a range of intensities (Alternatives 2, 3 and 5); or 3) represent the application of certain City policies (Alternatives 4 and 6).

- **Alternative 1 - No Project** -- The No Project alternative is required by Section 15126.d.2 of CEQA and assumes that project development does not occur. The alternative serves as a baseline for comparing the environmental impacts of the proposed project and all other alternatives.

- Alternative 2 - **More Housing** -- an adjusted land use mix to accommodate additional residential uses within a similar intensity project context. (3.57:1 Floor Area Ratio)
- Alternative 3 - **Sports Arena, Urban Entertainment Complex and Housing** -- an adjusted land use mix to accommodate a 22,000 seat sports arena, an urban entertainment complex and additional residential uses, within a similar intensity project context. (3.57:1 Floor Area Ratio)
- Alternative 4 - **Community Plan** -- development generally in conformance with existing Central City North Community Plan, resulting in significant change in land use mix and an overall 16 percent reduction development density (3:1 Floor Area Ratio)
- Alternative 5 - **Reduced Density** - a reduced development intensity reflecting a 44 percent reduction (2:1 Floor Area Ratio) with no demolition of contributing and significant historic structures.
- Alternative 6 - **Land Use/Transportation Policy** -- development in conformance with City of Los Angeles Land Use-Transportation Policy generally representing a higher intensity project (40%) with increased emphasis on hotel and residential uses (5:1 Floor Area Ratio)
- Alternative 7 - **Alternate Site Location** -- development of the project, essentially as proposed, at an alternate site location, possibly one of four other sites identified (3.57:1 Floor Area Ratio)

ASSUMPTIONS AND METHODOLOGY

The anticipated means for implementation of the alternatives can influence the assessment and/or probability of impacts for those alternatives. For example, a project may have the potential to generate impacts, but considerations in project design may also afford the opportunity to mitigate or minimize those impacts. It would be unreasonable to consider an alternative, and not also consider that certain levels of standard mitigation would be applied at a minimum. "Standard mitigation" implies those types of mitigation which would be typical with other development projects elsewhere throughout the City. Further, it is reasonable to assume that certain alternative scenarios also could feasibly be implemented through a "specific plan" or similar policy guided process which sets the tone

for quality planning and development. For the analysis, it is assumed that those alternatives (Alternatives 2, 3 and 5) which are similar to the project in scale, intensity or land use mix would be similarly implemented through a "specific plan" of comparative objectives and quality as the ADP. It is assumed that those alternatives (Alternatives 1, 4 and 6) which are generally the fulfillment of existing or anticipated City policy would be implemented through standard City means in accordance with the existing General Plan, Community Plan, or relative policies (i.e., Land Use/Transportation Policy). Standard developer agreement conditions, or City precedented mitigation measures, would also be assumed to be included with each alternative.

The alternatives analysis is presented as a comparative analysis to the project. The impacts as discussed are essentially a "net" level of impact that is assumed with the application of reasonable mitigation measures, such as those comparable to the proposed project. Impacts of the various alternatives are compared to the project and identified as measurably greater (+), measurably less (-) or essentially similar (o) to the level of impact of the project. Further, the resulting level of impact significance is generally identified as: (I) insignificant or less than significant; (S) significantly adverse; or (P) potentially significant or possibly significant under certain circumstances. In some cases, although an alternative may demonstrate a measurably lesser level of impact, the net level of impact could still be categorized as "significant".

Each alternative analysis generally assumes that similar levels and types of cumulative projects will occur as is evaluated with the proposed project.

The following alternatives analysis discusses the alternatives' impacts relative to each environmental issue, consistent with those addressed in the project analysis. Although the assessment is more general, similar methodologies and assumptions for analysis were employed. Specific technical assumptions include:

Traffic Methodology

In a similar fashion to the methodology utilized to analyze the proposed project, trip generation and modal split characteristics for the alternative land uses were derived. These assumptions are provided in the Technical Appendices available at the City of Los Angeles Planning Department. In summary, the trip rates utilized for the research and development land use category were slightly lower than for a general office category, and because of the central urban area location were assumed to have the same modal split characteristics as office uses. For movie theaters/entertainment uses, a trip rate was computed for theaters, and mode split was assumed to be similar to retail with slightly less transit use and slightly higher automobile use.

Trip generation and mode split characteristics for a sports arena for Union Station were derived from a variety of sources and studies of other arenas around the country, as well as consideration of the proposed location immediately adjacent to extensive transit facilities in downtown Los Angeles. Based on these considerations it was assumed that approximately five percent of spectators would walk into the arena (from other land uses in the Alameda District Plan and the immediately adjacent areas), and that 45 percent of all spectators would use transit to arrive at the arena (including many who would work downtown, leave their cars parked downtown, and take transit to the arena site). Average vehicle occupancy for arrivals by automobile was assumed to be 2.75 persons per vehicle. It was also assumed that most arena events would start at 7:30 in the evening, and that based on both local experience and other arenas, only about 10 percent of spectators would arrive during the p.m. peak hour between 5:00 p.m. and 6:00 p.m. (the peak hour analyzed). The majority of spectators would arrive after the end of the evening peak hour. For purposes of analyzing a worst case scenario, the transportation analysis addressed the operation of the sports arena at full capacity, that is 22,000 seats.

Air Quality Methodology

For air quality, emissions were calculated at the regional level using vehicle trip projections developed for the alternatives based on average regional VMT rationed to each alternative. Utility emissions are not quantified, because with the exception of NO_x emissions, these continue to remain a small percentage of total emissions. To the extent feasible, natural gas emissions are evaluated qualitatively based on relative change in the alternative development of size to the project.

Noise Methodology

Alternative noise impacts were analyzed based on the twenty-eight (28) roadway links identified for the ADP traffic analysis area and noise levels along each link were calculated based on the net change in traffic volumes. Changes in noise levels of 3 dB or less were not considered to be a significant measurable change.

Following each individual alternatives analysis is a summary section which provides an overview of the impacts of the alternative along with an assessment of the ability of that alternative to meet the project objectives and its ultimate feasibility.

The end of the alternatives section includes an Alternative Matrix Summary which compares each alternative to the proposed project. Finally, in compliance with CEQA, an "environmentally superior option" is discussed.

ALTERNATIVES ANALYSIS

Alternative 1 - No Project

In accordance with the State CEQA Guidelines, the "No Project" Alternative was evaluated as a potential project option. The No Project concept was one possible scenario considered at the time preliminary concepts were developed for the planning process. The assumptions considered for the No Project Alternative:

- current zoning and general plan designations for the area would remain
- under developed and under utilized parcels would remain throughout the area
- conditions and levels of economic/residential viability would remain essentially the same as they are today

This alternative would involve no major new development, but would not preclude other less regulated development opportunities in the future. Anticipated land uses would be a continuation of current uses (developed and under construction) on-site which are predominantly government office, vacant and undeveloped. Also, inherent in the "no project" concept is the understanding that if development/growth does not occur on this site, comparable development will most likely occur somewhere else throughout the region. Where appropriate, this displacement of development is discussed in this analysis. However, a full discussion of development at an "alternate site location" is provided in Alternative 7.

Land Use

The No Project Alternative would not result in any significant changes to the existing land uses or entitlements. Projects within the area currently under construction would be completed but no new development would occur. The site would remain underutilized within the context of existing plans and the intensity of the surrounding area and development regulations and guidelines provided by a specific plan would not be implemented.

Aesthetics

Aesthetics is a subjective issue, but certain elements are measurable. In terms of mass and scale, the No Project alternative would offer less change to the area. Existing viewsheds would remain unaltered, and associated significant impacts due to the historic nature of the site (including viewsheds both to and from within the site), would be reduced.

Cultural Resources

The potential for impacts to archaeological, paleontological and historic resources, due directly to development and disruption, is reduced as existing resources would remain undisturbed and historical architectural issues of incompatibility would not arise.

Transportation

With this alternative, no new traffic would be directly drawn to the project site, except that which may relate to continued and increased use of the Union Station transit facilities. Existing conditions currently reveal intersection service level and capacity problems at a minimum of six local intersections. Further, these conditions are anticipated to worsen by the year 2010 due to background growth unrelated to the proposed project. The proposed project traffic analysis (Section IV.D.1) indicates that approximately 50 percent of those intersections impacted to LOS E or worse, can be mitigated to acceptable levels, in spite of increased traffic from project development. No such mitigation would be provided with the No Project alternative. Additionally, project mitigation would improve conditions at some study intersections expected to operate at LOS E or worse without the project. Hence, even though the No Project alternative would contribute substantially less traffic to the project vicinity, the level of impact would be worse, based on the total number of intersections which would operate below acceptable service levels.

Population, Housing and Employment

Under this alternative, no new floor area is added and no existing floor area is demolished. Therefore, no net change in employment growth or economic incentives would occur. Similarly, no new housing units would be added to the local housing stock. Both the equivalent daytime and the full-time populations would remain essentially the same.

Air

No additional emissions would be generated from non-development of the project site. However, the existing air quality conditions and non-attainment are considered significant and therefore, the impacts could remain potentially significant. It should be noted that a greater level of impact may evolve, in the long-term, if the 10 million square feet of development proposed for this site is ultimately developed elsewhere throughout the region, and without benefit of regional transit access.

Noise

As traffic levels would be reduced (relative to the project), noise impacts would be comparatively minimized. Community noise levels are proportional to traffic volumes (ADT). The No Project alternative would not represent a significant change from existing noise conditions. Further, the potential for disturbance to site occupants would be reduced and the daytime population would not significantly change. No construction related impacts would be anticipated.

Earth

The impacts related to geologic hazards and grading would remain essentially as they currently exist. Geologic hazards and grading impacts associated with new development would not occur. Potential seismic-related issues at the site would be reduced with the No Project alternative, as less people would be located on-site and higher elevation buildings would not be built. Air and water quality impacts associated with intensive grading would not occur. In general, the No Project alternative offers a better scenario of earth-related impacts than the proposed project.

Water

The degree of impermeable surfaces would remain essentially the same and the level of runoff would not change significantly from the existing conditions. This would represent a less significant impact from the proposed project.

Risk of Upset

Preliminary site assessments conducted at the project site have identified potentially significant levels and areas of soil or groundwater contamination, created by previous (railyard) activity at the site. Remediation is already underway with respect to the Union Station and Terminal Annex properties. Adequate remediation and monitoring measures would be required throughout the remainder of the site with the proposed project.

Light & Glare/Shade & Shadow

The No Project alternative would not represent a significant change in light and glare, or shade and shadow conditions from what currently exists. The proposed project represents a potentially significant effect from shade and shadow due to the scale and massing of development required for a project of its intensity. The No Project would represent substantially less impacts relative to light and glare, and shade and shadow.

Public Services & Utilities

As no new uses would be introduced to the site, no measurable increase or change would be apparent with the No Project alternative. In all cases, the level of impact for public services and utilities would be insignificant.

Growth Inducing

The No Project alternative would not directly induce either economic or population growth. However, a decision not to develop the project site may result in development with similar aspects dispersed elsewhere within the region.

Alternative 1 - No Project Alternative Conclusions

The No Project Alternative, although it would not significantly alter the environment from what currently exists, does not necessarily represent an improved environment compared to the proposed project. In many cases, the ultimate "quantitative" level of the No Project alternative is less than that of the project, but a significant, or potentially significant, level of impact would remain, as with traffic and air quality. The impacts described here consider primarily the short-term effects to the environment and immediate area, and in that regard are somewhat less significant than the proposed project. However, the absence of a long-term development strategy for the project area could result

in detrimental environmental effects elsewhere throughout the LA region. Further, this alternative does not fully recognize, or take advantage of the transit intensive nature of the site and its ability to service the employment intensive downtown area. As such, this alternative would not achieve important project objectives that capitalize on the transit orientation of the site and would provide links and amenities to and for the downtown area and broader region.

Alternative 2 - More Housing

The proposed ADP could be modified to increase the residential component of the project. Currently, the proposed ADP includes 300 multi-family residential units. As an alternative, an additional 1,000 residential units could be included in the ADP (resulting in a total of 1,300 units), by offsetting the amount of government and commercial office space by approximately 1.5 million square feet. Similarly, the hotel development would be enlarged to 1,400 rooms, and retail uses would be increased and oriented to the residential market. Entertainment facilities would also be included.

Table 147 shows a breakdown of land uses for this alternative. Commercial office space would be reduced by 26 percent, from 5,950,000 square feet to 4,400,000 square feet. New government office space (excluding the adaptive reuse of the Terminal Annex structure) would be reduced by approximately 17 percent, from 2,785,000 square feet to 2,300,000 square feet. With the shift from a more transportation/business oriented project to a more mixed-use concept, hotel and retail uses would increase. Specifically, hotel and conference center facilities would increase by approximately 81 percent, from 1,050,000 square feet and 750 rooms to 1,900,000 square feet and 1,400 rooms with this alternative. Retail uses similarly increase with the alternative by 74 percent, from 250,000 square feet to 435,000 square feet. The alternative assumes that 11,968 parking spaces would be provided to meet on-site needs.

Since the More Housing alternative would maintain the same density as the proposed ADP, and is conceptual in nature, it is assumed that most physical impacts would remain generally comparable, although some variation in building heights and placement would be expected. However, operational impacts would vary in comparison to the proposed ADP, due to the differing land uses associated with this alternative.

The following environmental impacts could be expected, assuming that the same or similar mitigation measures identified for the proposed ADP are implemented for the alternative, and that a specific plan or similar policy implementing vehicle would be developed for the alternative:

TABLE 147 ALTERNATIVE 2 -- MORE HOUSING (Maintain Project Density/Increased Residential/3.57:1 FAR)	
Use	Maximum Floor Area (square feet)
Commercial Office	4,400,000
Government Office	2,300,000
Hotel and Conference Center (1,400 rooms)	1,900,000
Residential (1,300 units)	1,300,000
Government Office (adaptive reuse)	457,000
Retail	435,000
Museum	70,000
TOTAL ALTERNATIVE 2 DEVELOPMENT	10,862,000
Existing to Remain (Union Station)	98,700
TOTAL NEW AND EXISTING DEVELOPMENT	10,960,700

Land Use

The More Housing alternative would represent a development of similar scale, massing and intensity as the proposed project, hence the difference in land use mix would provide no measurable relief from the overall project scale. To some extent, this alternative would represent a somewhat better balance of land uses through the provision of the additional housing units and visitor-serving uses (i.e., increased hotel and conference center area). This improved balance would be consistent with regional policy planning trends which seek to encourage mixed-use developments and offset employment uses with housing opportunities as a means of improving regional transportation, congestion management and air quality concerns.

Aesthetics

As the intensity and scale of the More Housing alternative would be essentially the same as for the proposed project, the aesthetics impacts would remain similar to those described for the proposed project. The mass of project buildings would most probably obstruct viewsheds of the Terminal Annex and Union Station buildings and the visual character of the site would be modified.

Cultural Resources

The More Housing alternative would essentially require the same level of physical development as the proposed project, including similar levels of surface and subsurface disruption; however, the net level of impact would be less than significant. From a historical perspective, it is anticipated that the scale and massing of structures required to accommodate a project of this size, would present similar historical preservation related impacts as with the proposed project, and these would be significant. It is possible that the greater percent of housing related square footage would offer certain architectural opportunities for incorporating design and preservation features that correspond more favorably to historic structures which might not be available to more intensive office projects. Even so, the net level of impact is anticipated to be significant. The cultural/historic/archaeological impacts would remain similar to those described for the proposed project.

Transportation

This alternative would entail the same amount of overall square footage as the proposed project. However, significantly more housing would be available with this alternative, as well as more hotel rooms, slightly more retail square footage and slightly less office space.

Total trips generated for this project alternative would be very similar to the proposed project because trips from the additional residential would displace the reduction in office-related trips. There would be a slightly higher (3%) total of daily person trips generated by this alternative, with daily transit trips being about one percent less, and daily auto vehicle trips being about eight percent higher than the proposed project. This pattern would be similar for the peak periods, although because there would be less commercial space and more residential space, the differences would vary by direction of trip. For example in the p.m. peak hour there would be an increase of 30 percent in in-bound trips to the project (that is in the non-peak direction), and there would be a decrease in out-bound trips (i.e., the peak direction) from the project of about six percent.

This alternative would be expected to have very similar transportation impacts to the proposed project. Because it would reduce outbound p.m. peak trips slightly, this alternative may have marginally less or lower impacts on the transportation system, as the additional trips generated by this alternative would be added to the roadway network in the non-peak direction. However, due to the overall increase in daily auto trips, in general it could be expected that this alternative would have the same type and level of impact on roadway links, and intersections, as well as on freeways and at CMP locations.

Access issues would be similar to the proposed project. The More Housing alternative would require marginally more parking than the proposed project. It is anticipated that such parking could readily be accommodated within the project site.

Population, Housing & Employment

The More Housing alternative would result in approximately 33,400 total jobs, or a little more than 19 percent less than the proposed project. A similar number of short-term construction-related jobs, as with the proposed project, would be anticipated.

This alternative would include 1,000 more dwelling units than the proposed project. Though this is a large number for one project in terms of the downtown residential market, like the project, this would result in a relatively insignificant proportion of forecasted housing unit growth in each geographic zone around the project site. It would increase the potential for both project-related and other downtown area employees to live closer to where they work or to a major regional transportation hub. These additional units would yield about 3,640 total full-time residents, or a 627 percent increase from the proposed project. However, this population increase is considered to be relatively insignificant with respect to population growth forecasts for the area.

Air

The More Housing alternative would generate approximately 5,058 total pounds of traffic-related emissions (for all types) per day, an eight percent increase over the project's 4,692 pounds per day. This is due to the corresponding increase in daily auto trips associated with this alternative. This alternative would represent an overall negative, or greater, air quality impact compared to the project. Project level impacts are already significant, and would remain so.

Noise

Anticipated noise levels for the More Housing alternative are almost identical to the noise levels identified for the proposed project. In no instance modeled, would the noise levels increase by 3dB or more from current conditions, hence, the net impact would remain insignificant. However, more housing would introduce a greater spectrum of sensitive noise receptors, thus increasing the overall level of sensitivity to noise levels and thresholds.

Earth

The impacts related to geologic hazards and grading would be similar to those described for the proposed project. Similar levels of excavation and earth disturbance would be required. With similar mitigations, including similar requirements for residential development, these impacts would remain insignificant.

Water

This alternative, as with most of the alternatives and the project, represents a level of buildout of the project site that would essentially overcover most of the geographic area of the project site. Similar volumes of runoff are anticipated with this alternative as was considered with the proposed project, thus the level of impact would remain insignificant.

Risk of Upset

Impacts relating to hazardous materials and risk of upset would be essentially the same as for the proposed project.

Light & Glare/Shade & Shadow

The More Housing alternative would not represent a significant change from the proposed project relative to light, glare, shade and shadow issues. Ultimately, project design will be crucial in minimizing the impacts in these areas. It is possible that due to the increased number of on-site residents, that nighttime illumination and shade could become a more critical concern to those users as they will be more sensitive to these issues than daytime office workers.

Public Services & Utilities

As the overall project density levels are similar for the More Housing alternative, compared to the proposed project, similar service and utility demand is anticipated. The shift in land use mix will show that actual consumption/generation demand for utilities will vary slightly (i.e., slight increase in natural gas, slight decrease in electricity), however, these are not considered to be measurably significant given the project/alternative scale. The additional population associated with the 1,000 additional units, will generate a greater impact on for schools, parks, recreation, libraries, police and fire services. Potentially significant impacts could be created, based on enrollments or utilization levels at the time of development. However, school impacts for this alternative are considered to be off-set by required school impact fees. Existing library facilities are adequate, and the provision of open space mitigates any potential parks/recreation impacts. Solid waste issues would remain significant due to existing limitations on landfill capacity at the regional level. Residential uses would generally create more demand priority response calls for police services than non-residential uses. Accordingly, this Alternative could create a greater impact on police services.

Growth Inducing

The More Housing alternative can be viewed as one which provides a range of both housing and employment opportunities within one specific location. Like the project, this alternative represents opportunities for significant economic growth through the physical development of an employment center. It is anticipated that these jobs will be filled by existing population throughout the Los Angeles basin.

Alternative 2 - More Housing Alternative Conclusions

In most regards, the More Housing alternative presents an environmental impact scenario which is similar to the proposed project but leans slightly toward a greater level of impact. Slight increases in the "quantitative" level of impact can be anticipated relative to parking, air quality, noise and services. The residential component will generate a greater demand for schools and related services. It is believed that library services remain adequate to support this project. For noise, schools, and parks/recreation the net level of significance has the potential to be significant. However, school impacts for this alternative, are considered to be off-set by required school impact fees. Police services would be more significantly impacted with this alternative. Noise issues would become potentially significant due to the increased residential component (and related degree of sensitivity). All other issues remain similar as for the proposed project. From an environmental standpoint, this alternative offers no significant measurable environmental advantages.

The More Housing alternative meets all 14 of the identified project objectives, and in some cases (as for Objectives 1 and 9), may actually offer an opportunity to more effectively address the objective than does the proposed project.

Alternative 3 - Sports Arena, Urban Entertainment Complex and Housing

As envisioned for this alternative, a sports arena facility would be located above the existing railroad tracks on the Union Station property. The alternative would also feature an urban entertainment complex component and a substantial increase in housing. The urban entertainment complex would be conceived as a pedestrian intensive mixture of theaters, clubs, restaurants, shops and other related uses and attractions totalling 700,000 square feet. The proposed residential component would increase from 300 units to 1,200 units. Other project components including government and commercial offices and hotel facilities would decrease to offset increases and introduction of other uses. The sports arena facility itself is assumed to have a maximum occupancy of 22,000 seats and approximately 600,000 square feet of floor area.

Table 148 shows a breakdown of land uses for this alternative. Commercial office space would decrease by approximately 16 percent from 5,950,000 square feet to 5,000,000 square feet. New government office space (excluding the adaptive reuse of the Terminal Annex structure) would be reduced by approximately 29 percent from 2,785,000 square feet to 1,965,000 square feet. Hotel facilities would decrease by approximately 36 percent from 1,050,000 square feet and 750 rooms to 670,000 square feet and 550 rooms with this alternative. Office serving retail uses would decrease with the alternative by 20 percent from 250,000 square feet to 200,000 square feet. The alternative assumes that 11,980 parking spaces would be provided to meet on-site needs.

TABLE 148 ALTERNATIVE 3 -- SPORTS ARENA, URBAN ENTERTAINMENT COMPLEX, AND HOUSING	
Use	Maximum Floor Area (square feet)
Commercial Office	5,000,000
Government Office	1,965,000
Government Office (adaptive reuse)	457,000
Hotel (550 rooms)	670,000
Sports Arena (22,000 seats)	600,000
Retail	200,000
Urban Entertainment Complex	700,000
Museum	70,000
Residential (1,200 units)	1,200,000
TOTAL ALTERNATIVE 3 DEVELOPMENT	10,862,000
Existing to Remain (Union Station)	98,700
TOTAL NEW AND EXISTING DEVELOPMENT	10,960,700

Since the alternative would maintain the same density as the proposed ADP, and is conceptual in nature, it is assumed that most physical impacts would remain generally comparable, although some variation in building heights and placement would be expected. Operational impacts would vary in comparison to the proposed ADP, due to the differing land uses associated with this alternative, particularly the sports arena, which would generate impacts on an event-related basis, and the inclusion of more residential units.

The following environmental impacts could be expected assuming that the same or similar mitigation measures identified for the proposed ADP are implemented for the alternative:

Land Use

The Sports Arena, Urban Entertainment Complex, and Housing alternative would represent a development of similar scale, massing and intensity as the proposed project. This alternative would bring in users during the nighttime as well as the daytime, as opposed to the project which is predominantly a daytime oriented use. A sports arena and urban entertainment complex would introduce many characteristics that could influence surrounding areas. Given the tourist nature of the nearby Olvera Street and Chinatown, a sports arena could enhance the social and cultural uses in surrounding areas. This alternative offers a greater variety of land uses with differing potential peak hours of activity within the site. This diversity in uses affords advantages for maximizing shared parking, and utilization of transit infrastructure. Utilization of these capital intensive structures would be employed during the weekend and evening hours as well.

Aesthetics

As the intensity and scale of the Sports Arena, Urban Entertainment Complex, and Housing alternative would be essentially the same as for the proposed project, the change in aesthetics impacts would remain similar to those described for the proposed project with respect to obstruction of important historic viewsheds and modification of on-site visual character. Depending upon the design, the scale and massing of the sports arena itself, as well as the urban entertainment complex impacts could be considered adverse within the context of the surrounding area. However, these aspects are considered to be mitigatable through design and detailing. The sports arena concept that is envisioned for this alternative is more "design intensive" than arenas typically found in a more suburban setting. The design aspects could represent a significant architectural contribution to the downtown's repertoire of classic architecture. Scale, massing and view obstruction would be the focus of negative impacts.

Cultural Resources

The Sports Arena, Urban Entertainment Complex, and Housing alternative would essentially require the same level of physical development as the proposed project, and similar mitigation would be anticipated to maintain archaeological and paleontological issues to similar insignificant levels. The massing and scale of the sports arena and urban entertainment complex along with the remaining development, would present historic compatibility and preservation challenges, as does the proposed

project. These issues may be exacerbated by the introduction of a sports arena and urban entertainment complex (which may seem out of character historically) to the area. As previously mentioned, certain design and detailing measures can be employed to off-set and break-up the massing concerns.

Transportation

This alternative would generate approximately 3 percent more daily persons trips than the proposed project. There would be a decrease of approximately 3 percent in daily transit trips, and an increase of approximately 11 percent in daily auto vehicle trips compared to the proposed project. There would be fewer trips by both modes during the a.m. peak hour (14 percent fewer transit trips, 5 percent fewer auto vehicle trips). There would, however, be more trips during the p.m. peak hour, particularly auto vehicle trips which are estimated to be approximately 61 percent higher than with the proposed project. Transit trips during the p.m. peak hour are estimated to be 14 percent higher than the proposed project. The increase in p.m. peak hour traffic is attributable to the urban entertainment complex, which includes uses which are typically active during evening hours such as retail, restaurants, and clubs. The sports arena would generate no trips during the a.m. peak, and most of the trips generated by the arena would be on weekends and in the evening after the p.m. peak hour when there will be surplus capacity on the roadway system. The arena is also a very compatible land use for transit, with its location in such close proximity to the hub of the regional transit system, and so close to the downtown employment base. It is anticipated that quite a high proportion of arena spectators would be drawn from the downtown area, who could leave their cars parked at or near their office locations and take rail or bus transit to the arena at Union Station and then return to their parked cars in downtown after the event. Likewise, the Urban Entertainment Complex is expected to attract employees and visitors who would leave their cars parked at the site or at nearby locations, or employees in the more general downtown area who would otherwise travel on the regional roadway and freeway systems to find similar activities.

It should be noted that the most significant increases in vehicle trips in this alternative would occur in the inbound direction during the p.m. peak. The p.m. peak outbound trips in this alternative are approximately 21 percent higher than with the proposed project, however, the inbound trips are more than double those estimated for the proposed project.

Because of the increases in traffic relative to the proposed project, this alternative could have greater levels of transportation impacts on the roadway system and intersections immediately surrounding the project site, and would require greater levels of mitigation. However, there would likely be benefits to the regional transportation system. For the roadways in the quadrants south and east of Union

Station, the inbound project traffic would be traveling in the reverse direction to peak traffic flow. For the quadrants north and west of Union Station, west of Route 101, inbound project traffic flow would coincide with downtown outbound traffic flow. However, it is anticipated that the project would divert some of these trips already on the system by offering an alternative activity during the peak hour commute (i.e., health club, theaters, restaurants), delaying their entry to the congested freeways until after peak.

Access issues would be similar to the proposed project. Access points, driveway locations, and traffic control, would be largely the same for all project alternatives as for the proposed project. Generally, because the trip totals generated by the project alternatives will be similar or higher than the proposed project, it would not be expected that less driveways would be provided for any of the alternatives.

The Sports Arena, Urban Entertainment Complex, and Housing alternative would require marginally less parking than the proposed project and the impact would remain insignificant. Key differences in parking to the proposed project clearly relate to the entertainment/movie theater uses and to the sports arena. Both these land uses offer significant potential for shared parking because of the peak concentration of trip activity in the evenings and weekends. For example, with the sports arena it is anticipated that there would be a substantial amount of transit use to the site. This transportation analysis was based on an assumption that 50 percent of arena patrons would either walk or use transit to get to the site, and that for those arriving by automobile, the average automobile occupancy would be 2.75 persons per vehicle. Based on these assumptions, it is estimated that there would be a need for a maximum of about 5,000 parking spaces for the sports arena itself. Given the substantial amount of parking which will be available on the site, provided for the other land uses, it seems that there would be no reason to provide any additional parking specifically for the arena because of the high potential for sharing parking with the other land uses. For example, most of the arena patrons will arrive on the site well after office employees have departed from the site. Likewise, there may be some opportunities for shared parking with the mix of uses which will comprise the UEC and the surrounding office uses. However, to provide a conservative estimate of parking demand, no shared use has been assumed for the UEC. With the Sports Arena, Urban Entertainment Complex, and Housing alternative, the parking need of 5,000 spaces for the arena would comprise about 36 percent of the total parking need. It is unlikely that significant additional parking would need to be built for the arena.

Population, Housing & Employment

This alternative would accommodate a total of 35,776 jobs, or approximately 11 percent fewer jobs than the proposed project. A similar scale of construction related jobs are anticipated as with the proposed project. Approximately 88 percent of the long-term jobs would be office related employment. This alternative would offer 1,200 dwelling units, or 300 percent more than the proposed project. As with the proposed project, the contribution to the housing stock is positive, but not significant. This alternative, due to the greater level of housing, would provide more opportunities for project-related or other downtown-area employees to live closer to this employment center or a major regional transportation hub. The total permanent population would increase by 300 percent of the proposed project, with an estimated 1,503 residents. This level of population growth is not considered significant in terms of the forecasted population growth for each of the geographic zones in the surrounding area.

Air

The Sports Arena, Urban Entertainment Complex, and Housing alternative would generate approximately 4,596 total pounds of traffic-related emissions per day, a two percent decline over the project's 4,692 pounds per day due to the decline in daily auto trips. This alternative would represent an overall slight positive, or lesser, air quality impact compared to the project. As project level impacts are significant, the level of impact with this alternative would remain significant. It should be noted that the transit potential for the sports arena is probably not fully appreciated in this analysis. Ideally, it is anticipated that over time, transit service and urban entertainment complex to arena events and other entertainment/tourist elements of the site would be predominantly served by transit.

As with the project, it is anticipated that microclimate and wind conditions can be accommodated with adequate design.

Noise

Anticipated noise levels for the Sports Arena, Urban Entertainment Complex, and Housing alternative are almost identical to the noise levels identified for the proposed project. Noise model results for this alternative show that in no area around the project site, would the noise levels increase by 3dB or more from current conditions, hence, the net impact would remain insignificant. However, more housing would introduce a greater spectrum of sensitive noise receptors, thus increasing the overall level of sensitivity to noise levels and thresholds.

Earth

The impacts related to geologic hazards and grading would be similar to those described for the proposed project. Similar levels of excavation and earth disturbance would be required. With similar mitigations, these impacts would remain insignificant. Specially seismic and structural design requirements may be required for the sports arena and urban entertainment complex.

Water

Buildout of the project site that would overcover most of the geographic area of the project site. A slight increase in permeable surface beyond existing/project conditions may be created with the sports arena placement over previously permeable track area. Regardless, similar volumes of runoff are anticipated. Impacts would be similar to those described for the proposed project. The impact would remain insignificant.

Risk of Upset

Impacts relating to hazardous materials and risk of upset would be essentially the same as for the proposed project.

Light & Glare/Shade & Shadow

The addition of a sports arena and the urban entertainment complex to the project site, along with the mix of other uses, is anticipated to result in greater levels of nighttime light and illumination. Although it is assumed that the sports arena would be enclosed, security lighting and lighting for parking would extend the hours for evening lighting at the project site. Residential uses on and off site may be sensitive to the increased nighttime light levels, as well as from project shadows (for on-site residents).

Public Services & Utilities

The Sports Arena, Urban Entertainment Complex, and Housing alternative is anticipated to generate an increased demand for both utilities and services. Demand for fire and police protective services will shift in the timing of demand due mainly to the introduction of up to 22,000 spectators (a temporary population increase) in the project vicinity at sports arena event times, as well as increased visitor usage. The overall increase in persons to the site (including patrons of the urban entertainment complex) may require a greater demand for police services. An increase in solid waste generation

and electrical consumption is anticipated due to the operational needs of the sports arena and urban entertainment complex. Increased population associated with the 900 additional units, will also generate a greater impact on schools, parks, recreation, libraries, police and fire services. Potentially significant impacts could be created, based on enrollments or utilization levels at the time of development. However, school impacts for this alternative are considered to be off-set by required school impact fees. Existing library facilities are considered to be adequate, and the provision of open space areas within the project, in addition to existing nearby city parks, are considered adequate to meet additional open space needs for this alternative. Solid waste issues would remain significant due to existing limitations on landfill capacity at the regional level. Residential uses would generally create more demand priority response calls for police services than non-residential uses and could create a greater impact on police services. Impacts on other utilities would vary, but would not be expected to change in the level of significance compared to the proposed project.

Growth Inducing

The Sports Arena, Urban Entertainment Complex, and Housing alternative can be viewed as one which provides a range of both of housing and employment opportunities, with a greater emphasis on employment. Like the project, this alternative represents opportunities for significant economic growth through the physical development of an employment center. It is anticipated that these jobs will be filled by existing population throughout the Los Angeles basin.

Alternative 3 - Sports Arena, Urban Entertainment Complex, and Housing Alternative Conclusions

The Sports Arena, Urban Entertainment Complex, and Housing alternative, being of similar density and scale, presents an environmental impact scenario which in some areas is similar to the proposed project, but due to more residential development, could result in greater impacts to other areas. Measurable increases in the "quantitative" level of impact can be anticipated relative to aesthetics, historical resources, population/housing, solid waste, air quality and energy, but the net level of significance would be expected to remain the same as for the proposed project. Light and glare which would arise from artificial light would become potentially significant due to sensitivity of on and off-site residential uses as could on-site shading. It is believed that library services remain adequate to support this project. For schools and parks/recreation, the net level of significance has the potential to be significant. However, school impacts for this alternative are considered to be off-set by required school impact fees and the open space proposed by the Specific Plan adequately mitigates any impacts from this alternative. Police services would be more significantly impacted with this alternative. Noise issues would become potentially significant due to the increased

residential component (and related degree of sensitivity). From an environmental standpoint, this alternative offers no significant measurable environmental advantages over the proposed project.

The Sports Arena, Urban Entertainment Complex, and Housing alternative does achieve all of the 14 objectives identified for the project. In some cases, as for Objectives 1, 3 and 5 which emphasize visitor serving, tourism and economic development, this alternative may actually offer an opportunity to more effectively and fully achieve the objective than does the proposed project.

Alternative 4 - Community Plan

As discussed in detail in Section III (Environmental Setting), the project site is designated by the current Central City North Community Plan for Heavy Industrial and Parking uses. These designations have corresponding zones of M3 and P, which are generally consistent with the existing [Q] M3-1 zoning of the ADP site. As discussed in Section III, the maximum permitted FAR for this designation is 3:1 (through zone and height district changes). The uses and densities permitted by the existing Community Plan provide reasonable parameters to evaluate as a project alternative. The site is located in a dense urban area with neighboring industrial zoning and associated uses. Development in conformance with the Community Plan would involve developing the site with new industrial related uses not included in the ADP as well as any similar uses to those existing on the site, but at a much higher density than what currently exists.

The Heavy Industrial designation, (with a "Q" development condition), of the site by the Community Plan would permit an alternative in which all office uses would be government occupied and would permit a large research and development component. Other components of the proposed ADP, including residential, hotel and museum uses would not be a part of such an alternative. As with all alternatives and the proposed ADP, it is assumed that the Terminal Annex structure would be adaptively reused and that Union Station would be integrated into this alternative. Support retail uses would also be provided. Since this alternative would include uses that would be permitted by the existing Community Plan designation of the site, a General Plan Amendment would not be necessary. However, Zoning and Height District Changes would be required to allow for the maximum corresponding FAR of 3:1.

Table 149 shows a breakdown of land uses for this alternative. Government office space (excluding the adaptive reuse of the Terminal Annex structure) would increase by 137 percent from 2,785,000 square feet to 6,600,000 square feet as all commercial office space proposed by the ADP would be eliminated. Approximately 1,925,000 square feet of research and development uses not included as part of the proposed ADP would be included with the alternative. Retail uses would decrease by 44 percent from 250,000 square feet to 140,000 square feet. The alternative assumes that 9,361 parking spaces would be provided to meet on-site needs.

TABLE 149	
ALTERNATIVE 4 -- COMMUNITY PLAN	
(Change in Land Use/Conformance with Community Plan/Reduced Density/3:1 FAR)	
Use	Maximum Floor Area (square feet)
Government Office	6,600,000
Research and Development	1,925,000
Government Office (adaptive reuse)	457,000
Retail	140,000
TOTAL ALTERNATIVE 4 DEVELOPMENT	9,122,000
Existing to Remain (Union Station)	98,700
TOTAL NEW AND EXISTING DEVELOPMENT	9,220,700

Because the alternative would slightly reduce the overall site density compared to the proposed ADP, it is assumed that most physical impacts could also be slightly reduced. However, operational impacts would vary in comparison to the proposed ADP, due to the differing land uses associated with this alternative.

The following environmental impacts could be expected assuming that the same or similar mitigation measures identified for the proposed ADP are implemented for the alternative:

Land Use

The Community Plan alternative would involve development which is essentially in conformance with existing land use policy. Overall, this alternative would represent a slightly less intense development (3:1 vs. 3.57:1) from the proposed project and would include an employment component of research and development uses in addition to the office/government office. Other entertainment related uses, such as the museum and hotel, and housing would not be included. Essentially, the mix of uses offered with this alternative is orientated entirely toward daytime users with very little emphasis on visitor or service oriented uses, and is limited in diversity and density. From a plan conformity standpoint, this alternative would represent little impact; however, it does not represent a broad range or balance of on-site land uses. Also, although current land use plans would be adhered to, it is questionable whether the land use designations represented by the Central City North Community Plan present the highest and best use of the project site given the unique opportunities available because of the site's location and proximity to the downtown and Union Station transit hub, and in consideration of other more recent regional planning policy.

Aesthetics

It is anticipated that the Community Plan alternative would be implemented in accordance with existing city policy found in the Central City North Community Plan. The proposed project offers a specific plan with self-mitigating policies which are highly sensitive to aesthetics, design and interrelationship of uses. Further, a specific plan project represents an opportunity for consistency in design that might not otherwise occur through community plan level policy. Hence from a design standpoint, this alternative would not be considered superior to the proposed project, and may actually result in a lesser quality of design. Also, the lack of diversity in density/use may contribute toward a homogeneous development design. From a design perspective, this type of development may not bring the level of visual excitement that is desirable in the downtown area.

The scale and intensity of this alternative, although approximately 1.7 million square feet less, would still result in a significant change in the project area. To most, this reduction in project size would be imperceptible relative to the overall remaining size of the project. Significant viewsheds of the Terminal Annex and the Union Station buildings would still be affected, as would on-site visual character.

Cultural Resources

Potential impacts to cultural, historic and archaeological resources would be only slightly less than with the proposed project, due mainly to the reduced size/square footage of this alternative. Potential disturbance to surface/subsurface resources remains essentially the same as for the proposed project.

A slight reduction in overall project massing, along with development of predominately office type uses, might allow for a project design that could more readily match the historic nature of the surrounding area. However, the impacts would be similar to the proposed project.

Transportation

This alternative would constitute about 10 percent to 15 percent less overall project square footage than the proposed project. There would be about 20 percent less office space, which would be substituted largely by research and development space, about 30 percent less retail space, and there would be no hotel and no residential units in this alternative.

There would be about 25 percent less total daily person trips with this alternative compared to the proposed project. Daily transit trips would be about 20 percent lower than the proposed project and daily automobile trips would be about 30 percent less. This reflects the reduction in more auto oriented land uses in this alternative. There would be about 10 percent to 15 percent less transit trips in the peak periods, and about 20 percent to 30 percent less automobile trips in the peak periods with this project alternative. There would be significant reductions in both in-bound and out-bound trip totals in the peak hours, with the biggest reduction occurring in the in-bound p.m. peak hour, where vehicle trips would be 30 percent to 40 percent lower than with the proposed project. Out-bound peak hour trips would be between 12 percent and 25 percent lower than the proposed project.

Although there would be a significant reduction in trip generation with this project alternative, because the largest reductions would occur in the non-peak direction, it is anticipated that this alternative could have slightly lower, but generally very similar transportation impacts and mitigation needs on roadway links, intersections, and freeways, as for the proposed project. It does appear, however, that this project alternative could reduce many of the impacts identified for the proposed project on the CMP system. Access and parking issues would remain a concern.

Population, Housing & Employment

The Community Plan Alternative would result in an estimated 37,609 employment opportunities, an approximate 39.7 percent increase from the proposed project. The level of construction-related and indirect induced jobs would be similar to that of the proposed project. This alternative would feature a somewhat smaller concentration of jobs in office buildings as a component of research and development would replace some of the office-related jobs. Compared to the proposed project, there would be approximately one-fifth of the retail-related jobs and no hotel employment opportunities. Further, no residential units or permanent population increase would occur.

Air

The Community Plan alternative would generate approximately 3,381 total pounds of traffic-related emissions per day, an 18 percent decrease over the project's 4,692 pounds per day. This alternative would represent an overall positive, or lesser, air quality impact compared to the project. The level of significance would remain significant.

As with the project, it is anticipated that microclimate and wind conditions can be accommodated with adequate design.

Noise

Anticipated noise levels for the Community Plan alternative are slightly less than those noise levels identified for the proposed project. In no instance modeled would the noise levels increase by 3dB or more from current conditions; hence, the net impact would remain insignificant.

Earth

The impacts related to geologic hazards and grading would be similar to those described for the proposed project. Similar levels of excavation and earth disturbance would be required. With similar mitigations, these impacts would remain insignificant.

Water

This alternative, as with most of the alternatives and the project, represents a level of buildout of the project site that would overcover most of the geographic area of the project site. Similar volumes of runoff are anticipated, hence the impact would remain insignificant.

Risk of Upset

Impacts relating to hazardous materials and risk of upset would be essentially the same as for the proposed project.

Light & Glare/Shade & Shadow

The Community Plan alternative would generate light/glare through various reflective surfaces utilized in project design, and nighttime illumination from security lighting and internal office lighting; however, these will not vary measurably from the proposed project. The lower intensity use will result in lower elevation structures, thereby significantly reducing the potential for shade/shadow impacts both within and off site.

Public Services & Utilities

Impacts related to public services with the Community Plan alternative will be marginally less for each service due to the decrease in project size by approximately 1.5 million square feet. The impacts to utilities will also be similarly reduced; however, solid waste will remain a significant impact as solid waste disposal concerns remain a regionally significant issue.

Growth Inducing

The Community Plan alternative will offer substantial employment opportunities in the Los Angeles area, however, these will be somewhat less than with the proposed project, and overall are considered insignificant.

Alternative 4 - Community Plan Alternative Conclusions

The Community Plan alternative, being of similar, but slightly reduced, density and scale, presents an environmental impact scenario which is similar to the proposed project. Somewhat greater "impacts" are perceived in the areas of land use, aesthetics, and population/housing. The greater impact is assessed, not necessarily because of a measurable difference, but because certain desirable land use and aesthetic elements and goals could not be achieved. However, in all cases, except land use, the net level of significance remains the same as for the proposed project. The land use issue becomes a concern as the Community Plan land use designations may be somewhat obsolete given other influences, and likely market demand could detract from the Civic Center to further scatter the uses, thereby elevating residual land use impacts to potentially significant.

The Community Plan alternative fully achieves only one of the 14 objectives identified for the project. Only objective 13, which relates to on-site roadway design and transit access, could be met.

Alternative 5 - Reduced Density

A reduced density alternative has been identified that would keep all contributing and significant historic structures intact and result in total site development (new development, adaptive reuse and existing development to remain) at a 2:1 FAR. This represents a reduction in total site development and new/adaptively reused development of 44 percent. As with the proposed project, this reduced density alternative would require approval of a Specific Plan, a General Plan Amendment, Zoning and Height District Changes, Development Agreements and Subdivisions. Although the development density would be reduced, these discretionary approvals would still be necessary to provide the range and types of uses on the industrially zoned ([Q] M3-1) and designated (Heavy Industrial and Parking) properties. Unlike the proposed ADP, the reduced density alternative would not exceed the 3:1 maximum FAR permitted by the existing Community Plan designation.

The alternative would be accomplished by substantially reducing most of the primary land uses within the proposed ADP, with an adaptive reuse of the historic Terminal Annex and the Union Station structures. Table 150 shows a breakdown of land uses for this alternative. New buildings with commercial office space, the largest use proposed by the ADP, would be reduced by approximately 61 percent from 5,950,000 square feet to 2,313,700 square feet and 311,300 square feet of adaptive reuse commercial office space would be provided. New government office space (excluding the adaptive reuse of the Terminal Annex structure) would be reduced by approximately 28 percent from 2,785,000 square feet to 2,000,000 square feet. Hotel and conference center uses proposed by the ADP would be reduced by 46 percent from 1,050,000 square feet and 750 rooms to 570,000 square

feet and 375 rooms. Due to the substantially reduced density of the alternative, the housing component of the ADP would also be similarly reduced by 67 percent, from 300,000 square feet and 300 units to 100,000 square feet and 100 units. Retail uses would be reduced by six percent from 250,000 square feet to 235,000 square feet. The reduction in project density would consequently reduce the parking demands on the site. The reduced density alternative assumes that 6,598 parking spaces would be provided to meet these on-site needs. With this alternative, however, more surface parking would be provided because the ability to maximize subterranean parking would be limited by the preservation of all contributing historic structures.

TABLE 150 ALTERNATIVE 5 -- REDUCED DENSITY (Reduced Density (44%)/2:1 FAR)	
Use	Maximum Floor Area (square feet)
Commercial Office	2,313,700
Commercial Office (adaptive reuse)	311,300
Government Office	2,000,000
Government Office (adaptive reuse)	457,000
Hotel (375 rooms) and Conference Center	570,000
Retail	235,000
Residential (100 units)	100,000
Museum	70,000
TOTAL ALTERNATIVE 5 DEVELOPMENT	6,057,000
Existing to Remain (Union Station)	98,700
TOTAL NEW AND EXISTING DEVELOPMENT	6,155,700

This alternative would reduce both the physical and operational driven environmental impacts associated with the ADP. Physical impacts are those effects associated with development of the property itself (height, bulk, excavation), as opposed to those effects resulting from operation of the proposed project. Physical impacts of the ADP include excavation, wind speed increases, lighting, shade and shadow effects, visual impacts off-site, and historical, archaeological and paleontological resources. The reduction in the density of the project would serve to reduce operational driven impacts including traffic generation, air pollutant emissions, increased noise levels, utility and public service demands, and energy impacts.

The following environmental impacts could be expected assuming that the same or similar mitigation measures identified for the proposed ADP are implemented for the alternative:

Land Use

The Reduced Density alternative would involve development which is essentially one half the size of the proposed project. Overall, this alternative would represent a considerably reduced intensity development (2:1 vs. 4:1) from the proposed project but would provide a similar mix of land uses (office, retail, hotel and residential). A certain level of entertainment/visitor-serving uses would also be provided. This level of development, although it would minimize the potential for environmental impacts, does not consider the highest or best utilization of the project site and does not substantially contribute toward density levels intended from more recent City and regional plan policies. It would also fail to achieve certain design goals -- such as reduced surface parking and increased landscaped open space and courtyards to the extent the proposed project meets such goals.

It should be noted that this alternative, because of its reduced intensity, may not offer the economic flexibility to support useable open space amenities and other significant infrastructure improvements/enhancements. Further, the reduced intensity at this location would not fully support the economic investment committed to the regional transit hub.

Aesthetics

The diminished mass and scale of the Reduced Density alternative would offer a greater opportunity to minimize viewshed obstruction issues and align development to offer a reasonable transition between surrounding and adjacent developments, maintain historic viewsheds, courtyards and open spaces within the Plan, and, reduce impacts to on-site visual character. This alternative would result in more restricted development sites and an inability to place subterranean parking beneath historic structures. Thus, increased surface parking must be provided and a reduction in landscaped open

space would occur. Consequently, this alternative would limit the ability to create new pedestrian courtyards and open spaces within the Plan.

Cultural Resources

The Reduced Density alternative would essentially require the same level of physical site disruption as the proposed project, including similar levels of surface and somewhat lesser subsurface earth disruption; however, the net level of impact would be less than significant. As no demolition to historic structures would occur there would be no significant impact from demolition. It is anticipated that the scale and massing of new structures required to accommodate a project of this size, would present similar historical preservation challenges as the project, but this scale could offer greater flexibility for preparing a sensitive design relative to historic issues, possibly reducing the overall impact level to potentially significant. Impacts to the existing historic setting would be reduced and no structures would be developed along Alameda. Although this alternative still has the potential to be significant, in the absence of sensitive design, it is anticipated that in general the impacts and challenges to overcome them would be somewhat less than with the proposed project.

Transportation

This project alternative would comprise about 40 percent less square footage overall than the proposed project. There would be a reduction in all land use types from the proposed project, with significantly less office space, retail space, hotel rooms and residential units.

There would be a corresponding significant reduction in overall daily trips of about 44 percent compared to the proposed project. There would be an equal reduction in both transit and automobile trips. There would be an even larger reduction in peak hour trips, for example, a 53 percent reduction in p.m. peak hour automobile trips with this project alternative. These reductions would be in general fairly well balanced between the in-bound and the out-bound trips in the peak hours with there being a slightly higher reduction in out-bound trips during the p.m. peak hour.

This project alternative could significantly reduce the transportation impacts identified for the proposed project, although probably not in direct proportion to the reduction in trip generation volumes. It is estimated that this project alternative could reduce impacts on roadway links by up to 25 percent to 30 percent. It may reduce some of the intersection impacts identified for the proposed project, but probably only the more marginal ones. It is anticipated that this project could potentially reduce most of the freeway impacts and most of the CMP impacts identified for the proposed project, due to the significantly lower trip generation associated with this project alternative.

Because of the significantly reduced land use density for this project alternative, it is questionable whether the same level of on-site circulation and access infrastructure could be supported, so there may be less access driveways and less internal roadways than for the proposed project. In this context impacts on the adjacent street system immediately adjacent to the project site may in fact be quite similar to those identified for the proposed project, in that traffic under this project alternative may tend to make more use of the external road system because of a more limited on-site circulation system.

Population, Housing & Employment

Since the number of jobs is proportional to the amount of floor area (as well as the mix of land uses), it is logical to anticipate a reduced level of employment. This alternative, which represents the lowest level of intensity of the five development-oriented alternatives, would yield an estimated 22,700 jobs, or about 15.7 percent less than the proposed project. The number of construction, indirect and induced jobs would each be proportionately reduced as well. A slightly higher proportion of jobs in this alternative would be concentrated in office employment, 95 percent relative to 94 percent for the project. This alternative would have 100 dwelling units, or almost 67 percent less than the proposed project. As with the proposed project, it would represent a similarly negligible proportion of forecasted housing growth in local zones. It would provide proportionally fewer opportunities for local employees to live within a close proximity to downtown employment areas or a major regional transportation hub. Related to the number of dwelling units, a total of 280 on-site residents would be generated. This would not represent a significant increase to the regional population forecasts for this area.

Air

The Reduced Density alternative would generate approximately 2,615 total pounds of traffic-related emissions per day, a 45 percent decrease over the project's 4,692 pounds per day. This alternative would represent an overall positive, or lesser, air quality impact compared to the project. Existing conditions are already significant and the result alternative impact would remain significant, even with the overall reduction in emissions.

As with the project, it is anticipated that microclimate and wind conditions can be accommodated with adequate design.

Noise

Anticipated noise levels for the Reduced Density alternative are almost identical, though slightly less, than those noise levels identified for the proposed project. In no instance modeled, would the noise levels increase by 3dB or more from current conditions, hence, the net impact would remain insignificant.

Earth

The impacts related to geologic hazards and grading would be similar to those described for the proposed project, although reduced levels of excavation and earth disturbance would occur with the retention of historic structures and reduced amount of subterranean parking. Similar levels of excavation and earth disturbance would be required. With similar mitigations, these impacts would remain insignificant.

Water

Even with a significantly reduced intensity development, the site will remain primarily impermeable in the development areas. Similar impacts and volumes of runoff are anticipated with the impact remaining insignificant.

Risk of Upset

Impacts relating to hazardous materials and risk of upset would be essentially the same as for the proposed project. Even with a project of smaller scale, follow-up measures for site remediation would be required prior to development occurring, and impacts are considered mitigatable.

Light & Glare/Shade & Shadow

The Reduced Density alternative would introduce new light and glare sources to the area, but would not represent a change comparable to the proposed project. The proposed project represents a potentially significant effect from shade and shadow due to the scale and massing of development required for a project of its intensity. This alternative could be designed with much reduced building mass and elevation thereby alleviating the threat of shade/shadow on or off site.

Public Services & Utilities

Impacts to public services and utilities would generally be reduced to one-half of those identified with the proposed project. The reduced daytime population and intensity of uses could significantly reduce the demand for fire and police services, thereby presenting only a potentially significant level of impact. Utility demand would be reduced in all areas, but would remain significant for solid waste disposal.

Growth Inducing

This alternative will offer substantial employment opportunities in the Los Angeles area, however, these will be considerably less than with the proposed project, and overall are considered insignificant.

Alternative 5 - Reduced Density Alternative Conclusions

The Reduced Density alternative presents an environmental impact scenario that is notably improved in many significant areas. Impacts either remain similar or are reduced somewhat for almost all impacts. Land use and employment/housing impacts are considered to be somewhat greater only because this alternative cannot offer some of the benefits that come with "economy of scale" and balance available to a larger project. Impacts related to aesthetics, historical resources, natural light and fire/police services could be reduced to potentially significant, rather than significant.

Although physical impacts are notably reduced in many areas, the greater issue arises from other environmental and improvement goals which might not be achieved with a smaller project. Specifically, certain infrastructure improvements/upgrades may not be provided that could be implemented with a project of larger scale. Contributions toward the development of useable open space and public art would be reduced proportionally with a smaller project. Provision of other desirable amenities, such as child care facilities, would be similarly impacted. Further, the reduced intensity project offers less market potential and income for the City. Less diversity in project design and uses would be provided. From an urban design perspective, this alternative would result in additional surface parking lots, rather than the preferred subsurface structures. Surface parking would reduce the amount of available open space and pedestrian areas within the ADP.

High density uses are also encouraged around major transit centers. As noted by the City's Land Use/Transportation Policy (for more detail concerning application of this policy to the project site, please see the subsequent discussion concerning Alternative 6), the minimum desirable FAR for the Union Station property and adjoining 0.25 mile primary influence area is 4.5:1 and the maximum

desirable FAR is 10:1. The ADP, as currently proposed, has an overall FAR of approximately 4:1, which is below the minimum target FAR for transit center development at the project site. The reduced density alternative represents a 40 percent FAR reduction from the ADP, and is substantially below this minimum desirable FAR. As such, the alternative could limit the effectiveness of providing a transit oriented development of the site as noted by the City's Land Use/Transportation Policy.

The Reduced Density alternative could potentially achieve seven of the 14 objectives. Objectives 1, 3, 6, 7, 8, 12 and 14 are not met. In particular, objectives 1, 3, 6, 7, 8 and 12, which relate to provision of amenities and the maximization of urban form, transit and linkages and enhance economic vitality of the City, are not fully achieved since this alternative does not maximize the potential for these goals (as seen with the project and other alternatives).

Alternative 6 - Land Use/Transportation Policy

On November 2, 1993, the Los Angeles City Council adopted a Land Use/Transportation Policy to address the integration of future growth and burgeoning transit development within the City over the next 30 years. To that end, the City of Los Angeles and the Los Angeles County Metropolitan Transportation Authority undertook a cooperative planning effort to develop an integrated policy that addressed land use, transportation and air quality issues related to the regional transportation system. This policy offers both agencies the ability to ensure the success of the regional transportation system by using land use patterns that support transit ridership and capture revenue opportunities. The objectives of the Policy include focusing future growth around transit stations and increasing land use intensity in transit station areas where appropriate. Current and future Specific Plans are also identified as an instrument to meet the Policy's objectives.

The Policy identifies Union Station (and the Primary Influence Area within 0.25 mile) as an "Urban Complex". As identified by the Policy, Urban Complexes have experienced increased intensity of development and growth of economic opportunity, and are places where bus lines intersect or intermodal transfer of rail and bus transit occurs. These characteristics are clearly met by the ADP Specific Plan site. Other future transit stations within Urban Complexes include Wilshire Boulevard and Western Avenue, Chinatown, Hollywood Boulevard and Highland Avenue, Universal City, and Wilshire Boulevard and Vermont Avenue.

Under the Urban Complex designation by the Land Use Transportation Policy, the minimum desired FAR is 4.5:1 and the maximum desired FAR is 10:1. The Policy encourages a mixed-use, pedestrian friendly environment and provides for residential densities ranging from a minimum of 40 dwelling

units per acre to 60 dwelling units per acre. As envisioned for this alternative, the ADP would be developed at a 5:1 FAR and would include a larger housing component, a substantial increase in hotel and conference center facilities, and a new retail and entertainment component. The additional density permitted by the Policy would also provide an opportunity to incorporate a sports arena facility as described by Alternative 3, as well as associated increases in hotel and retail concentrations within the proposed ADP.

Table 151 shows a breakdown of land uses for this alternative. Commercial office space would increase by 26 percent from 5,950,000 square feet to 7,500,000 square feet. New government office space (excluding the adaptive reuse of the Terminal Annex structure) would increase by approximately 17 percent from 2,785,000 square feet to 3,250,000 square feet. Hotel and conference center facilities would increase by approximately 119 percent from 1,050,000 square feet and 750 rooms to 2,300,000 square feet and 1,625 rooms with this alternative. Retail uses would similarly increase by 70 percent with the alternative, from 250,000 square feet to 425,000 square feet, and would include entertainment facilities. Residential uses would increase by 133 percent from 300 dwelling units and 300,000 square feet, to 700 dwelling units and 700,000 square feet. As with Alternative 3, the sports arena facility is assumed to be located above the existing railroad tracks on the Union Station property would have a maximum occupancy of 22,000 seats and 600,000 square feet of floor area. The alternative assumes that 16,419 parking spaces would be provided to meet on-site needs. It is anticipated that the increased parking needs will be accommodated through additional subterranean parking areas.

The alternative would require that the Specific Plan be redesigned to meet the needs of this proposal with respect to land uses, design guidelines, circulation and other plan elements and to ensure the effective incorporation of the Land Use/Transportation Policy goals. Additionally, as with the proposed ADP, a General Plan Amendment, Zoning and Height District Changes, Development Agreements and Subdivisions would be required. It is also assumed that the Terminal Annex structure would be adaptively reused and that Union Station would be integrated into each alternative in the same fashion.

TABLE 151 ALTERNATIVE 6 -- LAND USE/TRANSPORTATION POLICY (Change in Land Use/Conformance with Land Use/Transportation Policy/ Increased Density/Sports Arena/5:1 FAR)	
Use	Maximum Floor Area (square feet)
Commercial Office	7,500,000
Government Office	3,250,000
Hotel and Conference Center (1,625 rooms)	2,300,000
Residential (700 units)	700,000
Sports Arena (22,000 seats)	600,000
Government Office (adaptive reuse)	457,000
Retail/Entertainment	425,000
Cultural Facilities	20,000
TOTAL ALTERNATIVE 6 DEVELOPMENT	15,252,000
Existing to Remain (Union Station)	98,700
TOTAL NEW AND EXISTING DEVELOPMENT	15,350,700

Due to the all around density increases in most uses proposed by the ADP, as well as the inclusion of new uses, this alternative would increase both the physical and operationally driven environmental impacts associated with the ADP. Similarly, construction related impacts would also increase. Physical impacts associated with greater building heights and excavation requirements would be expected to increase because the same size site would have to accommodate a greater amount of development. Operational impacts would increase as a result of the 40 percent increase in the overall density of the ADP.

The following environmental impacts could be expected assuming that the same or similar mitigation measures identified for the proposed ADP are implemented for the alternative:

Land Use

The Land Use/Transportation alternative would represent a development of overall greater scale, massing and intensity than the proposed project. The relative mix and proportion of land uses with this alternative, however, will essentially remain the same. While this alternative offers increased intensity, it may better further the goals of future land use planning trends to develop large-scale urbanized employment nodes, which would facilitate regional transit effectiveness. Also, certain mitigative features may be employed due to the "economy of scale" with this alternative, which may not otherwise be cost effective at the proposed project intensity level.

Aesthetics

As the intensity and scale of the Land Use/Transportation Policy alternative would be essentially 50 percent greater than the project, the aesthetic issues are expected to remain. A project of this scale would offer less flexibility in attempts to resolve viewshed and visual character issues and viewshed obstructions of historic views and changes to on-site visual character would still remain significant impacts.

Cultural Resources

The Land Use/Transportation Policy alternative would be larger and would require potentially greater areas of surface physical disruption, due to the additional development and additional excavation to accommodate increased parking demands. Similar mitigation would be anticipated to maintain archaeological and paleontological issues to similar insignificant levels; however, a somewhat greater potential exists for disrupting subsurface resources. The massing and scale of this density of project however offers a greater design challenge to deal with historic compatibility and preservation problems. These issues would remain significant and may be further exacerbated by the magnitude of an alternative of this size.

Transportation

This alternative would include significantly higher overall land use quantities than the proposed project. Total square footage for this alternative would be about 50 percent higher than the proposed project. There would be significant increases in the amount of office space, hotel rooms, and

residential units, with some increase in retail use also. In addition there would be entertainment uses and movie theaters in this project alternative, as well as a 22,000 seat sports arena.

This project alternative would generate much higher trip totals than the proposed project. There would be an 80 percent increase in total daily trips from this project alternative with a slightly higher increase in transit trips than automobile trips. There would nevertheless be a 60 percent increase in the overall total of daily automobile trips to and from the site with this project alternative. There would be correspondingly high increases in peak hour trips with this project alternative, although these increases would be somewhat lower than daily trip increases because some of the key uses such as entertainment and sports arena facilities would generate a large proportion of their trips in the evening after the p.m. peak hour. It should also be noted that much of the increase in trips generated from this alternative would occur in the non-peak direction on the roadways system, that is to say in in-bound direction to the project in the p.m. peak hour, associated with uses such as hotels and residential units. For example, in the p.m. peak hour, this alternative would generate 90 percent more automobile traffic in the in-bound direction to the project site, and about 37 percent more traffic in the out-bound p.m. peak hour direction than the proposed project.

It should be noted that the nature of transit facilities is that they are oriented toward, and in fact depend upon, high density and a wide mix of uses to support the components. This alternative may further realize transit infrastructure goals, ultimately resulting in a greater usage of the transit hub and less dependency on the automobile. In the long-term, certain traffic related, and parking issues, may diminish due to this transition.

It could be expected that this project alternative would have greater impacts than the proposed project. Transportation impacts at locations that were identified as significant impacts with the proposed project, would probably be greater impacts with this project alternative. It could also be expected that additional locations may show significant impacts with this project alternative, particularly for certain roadway links and intersections, but probably less so on the freeway system and at the CMP impact locations.

Population, Housing & Employment

Proportional to the project increase in size, this alternative would yield a total of 52,621 jobs, or an approximate 95.5 percent increase from the proposed project. The number of construction, indirect and induced jobs would be proportionately larger as well. However, with this alternative, a slightly smaller proportion of the overall jobs would be office related (92% vs. 94% for the project). With

a total of 700 proposed dwelling units, total residential population is anticipated at 1,960 residents, or about a 291 percent increase of the proposed project.

Air

The Land Use/Transportation Policy alternative would generate approximately 7,568 total pounds of traffic-related emissions per day, a 61 percent increase over the project's 4,692 pounds per day. This alternative would represent an overall negative, or greater, air quality impact compared to the project. The level of impact would remain significant.

As with the project, it is anticipated that microclimate and wind conditions can be accommodated with adequate design.

Noise

Anticipated noise levels for the Land Use/Transportation Policy alternative are similar, and only slightly higher, than noise levels identified for the proposed project. In only one instance (College Street east of Broadway) would noise levels increase to the threshold level of 3dB relative to current conditions. The net impact would remain insignificant. However, as this alternative offers more housing, noise sensitivity may be increased, thereby causing those areas of noise change which are at or near threshold levels to be of concern.

Earth

The impacts related to geologic hazards and grading would be similar to those described for the proposed project, except that greater volumes of excavation may be necessary to accommodate taller and larger buildings and subterranean on-site parking. With the employment of standard and best engineering practices, and similar mitigations, these impacts would remain insignificant.

Relative to seismic issues, the significant increase in daytime population may be cause for concern in a seismic event as it could create an evacuation problem from both taller buildings and along vicinity roadways.

Water

This alternative, as with most of the alternatives and the project, represents a level of buildout of the project site that would overcover most of the geographic area of the project site. Similar volumes

of runoff are anticipated. Impacts would be similar to those described for the proposed project. The impact would remain insignificant.

Risk of Upset

Impacts relating to hazardous materials and risk of upset would be essentially the same as for the proposed project.

Light & Glare/Shade & Shadow

The addition of an increased five million square feet of development would most likely require greater building massing and increased building elevation. This will increase the potential for glare and nighttime illumination, especially as surrounding residential uses may be sensitive to the increased nighttime light levels. However, a project of this intensity is also intended to create and offer a "urban environment". To a certain segment of the population, the atmosphere that is created in this level of intensity is desirable. Further, increased building heights and massing will increase potential concerns related to on-site and off-site shade and shadow issues.

Public Services & Utilities

The Land Use/Transportation Policy alternative is anticipated to generate a substantial increase in demand for both utilities and services. Demand for fire and police protective services will remain potentially or fully significant. All other services and utilities will increase but, with mitigation will remain insignificant, with the exception of solid waste which will continue to be a significant issue until regional solid waste management issues are resolved.

Growth Inducing

The Land Use/Transportation Policy alternative provides a range of both housing and employment opportunities, with a greater emphasis on employment and entertainment/visitor serving uses, on a much grander scale than the proposed project. Like the project, this alternative represents opportunities for significant economic growth through the physical development of an employment center. It is anticipated that these jobs will be filled by existing population throughout the Los Angeles basin.

Alternative 6 - Land Use/Transportation Policy Alternative Conclusions

The Land Use/Transportation Policy alternative, being of a substantial increase in project size, presents a less favorable environmental impact scenario brought on mainly by the magnitude of development centralized in one location. Impacts related to most issues (aesthetics, historical, traffic/parking, air quality, noise, earth, services/utilities) will increase on a quantitative level. Specific impacts related to parking, artificial light (light/glare) and police and fire services will increase a degree in level of significance to either potentially significant or significant.

Reverse of the situation noted for the Reduced Intensity alternative, the Land Use/Transportation Policy alternative offers many beneficial features brought about by the "economy of scale" concept that off-set the increases in certain physical impacts. Greater regional transit and economic benefits will likely be realized. The ability to further add to the investment of the area through improved intersections, pedestrian linkages, child care and related service facilities, open space and public art, etc. is enhanced.

The Land Use/Transportation Policy alternative represents a City-wide and regional goal of concentrating development around transit centers. Though impacts are increased here, they could be reduced on a macro-scale in comparison to the dispersion of development to sites without transit service.

This alternative fully achieves all 14 objectives. To some extent, due primarily to a greater diversity in uses and economies of scale, this alternative could also potentially achieve objectives 1, 3, 7, 8 and 12 more effectively than the project.

Alternative 7 - Alternate Site Location

For the Alternate Site discussion, four potential alternative sites are identified. While others may exist, these sites were selected for discussion due primarily to their size, availability, permitted land use and intensity, and readiness for development. These sites have been identified to allow the decision-maker a tangible comparison of potential impacts. However, identification of impacts for an alternate site can only be addressed generally until a more detailed project is designed for the unique characteristics of each alternative site.

The four sites are the Warner Center property near Woodland Hills, Taylor Yard near Glendale, Playa Vista near Marina del Rey, and Cornfield/Bullring northerly of Chinatown in downtown Los Angeles.

It is assumed that development displaced to an alternate site would maintain the same density as the proposed ADP, and hence, many of the physical impacts associated directly to project scale, such as water consumption, sewer, electricity, etc., would remain generally comparable to those expected with the proposed project. However, the physical placement of the project within the context of a different site location would also change the level of significance for many of the environmental issues. This is due mainly to the change in context of the historic setting, surrounding land uses, transit opportunities, geotechnical constraints, access, etc.

Traffic and air quality associated impacts would probably increase substantially with the Warner Center and Playa Vista Alternate Sites, as the proposed project has direct access to a major, multi-modal transit hub, and these sites do not. Such impacts would be somewhat reduced at the Taylor Yard and Cornfield/Bullring site as the first is situated along a transit line, and the latter is situated somewhat closer to the Union Station area or transit hub. Nevertheless, all alternative sites would likely result in greater impact than the proposed site. Also, there may be subtle variations on the quantitative numbers due to variances in average trip length, etc. One positive accomplishment of an alternate location may be to minimize the potential for impacts to historical resources which are endemic to the site. However, simply moving this project would not preclude development of a less sensitive historic preservation nature from occurring at the proposed site, and resulting in equal or greater impacts to the historic structures. For these reasons, alternate sites were evaluated but not concluded to be a reasonable alternative to the proposed project.

The following environmental impacts could be expected assuming that the same or similar mitigation measures identified for the proposed ADP are implemented for the alternative:

Land Use

The Alternate Site Location alternative would represent a development of similar scale, massing and intensity as the proposed project, but within a different location, having different land use variables, and without the multi-modal transit hub. Land use changes would be required in several of the locations. The Cornfield and Taylor Yard sites would require land use changes from the existing industrial uses permitted. Further, a specific plan or similar implementing tool would have to be established for either of these areas. Land use modifications to Specific Plans and General Plan amendments already in place regarding land use policies, may be required with the Playa Vista and Warner Center sites; however, both of these areas are already entitled for a range of land uses and higher densities.

The Playa Vista site also presents complications of jurisdiction. A portion of the site is within the County of Los Angeles, and almost three-fourths of the site falls within the California coastal zone, thereby requiring adherence with the Coastal Act.

The Playa Vista (1,087 acres), Warner Center (924 acres), and the Taylor Yard (174 acres) alternate sites each provide sufficient acreage to accommodate a development of the size and FAR proposed with the project. The Cornfield/Bullring site, at only 56 acres, would require a reduction in project size or a zone change to accommodate roughly a 5:1 FAR.

With all of these alternate sites, design modifications would be required to accommodate transit provisions or incorporate additional parking. The Taylor Yard site lends itself most readily to serving as a transit center, though not a transit hub (i.e., as a station stop (transit center) along one transit link versus a common meeting ground for multiple transit links (transit hub)). In each location, compensating factors would be required to off-set the advantages that would be lost by not being located directly adjacent to the regional transit hub. Also, regional policy would have to be reviewed relative to any of the alternate site locations to ensure that regional transit needs are adjusted to accommodate an employment center of this scale in one of these locations.

Finally, although the project could conceivably be designed to fit within the context of any of the alternate site locations, it would more readily relate to the Cornfield site which is located closest to the proposed site and linked to the downtown area. However, the increased FAR would require significantly taller structures, which in the context of the area north of Chinatown, would be out of character and inconsistent with goals to provide a transition from that area to the downtown. The increased FAR would also reduce the opportunity for open space and pedestrian-serving site design.

Aesthetics

As with the land use discussion, the relocation of the project to a new setting, with differing existing conditions and variables, could dramatically affect the means by which aesthetic impacts are assessed. Three of the alternate sites (Playa Vista, Warner Center and Taylor Yard) do not present historical viewshed and on-site visual character concerns similar to those identified for the proposed project. The intensity and scale of development at these three sites would be essentially the same as for the proposed project. Impacts related solely to the massing, scale and height of development at these three sites would be similar to those for the proposed project.

However, it is possible, with placement of this development within a surrounding area of less intensity such as the Taylor Yard site, that the visual impacts could be considered greater. The Cornfield site

could potentially have more significant aesthetic and visual impacts due to increased density on a smaller site.

Cultural Resources

The level of impact to cultural resources would be related to any cultural concerns identified for each potential alternate site, and how the cultural resources at the proposed downtown project site would be treated without the ADP project. However, it can be anticipated that the degree of significance at each alternate site would most likely be less, with the exception of the Cornfield site which also has a rich history associated with it. Impacts to the Union Station and Terminal Annex resources may be equal to, or greater than, those associated with the proposed ADP project. This is due to the fact that development will likely occur at the ADP site, even without the proposed Specific Plan, and less sensitive preservation measures may be utilized.

If subsurface components are found to occur at any of the potential alternate site locations, then a similar level of mitigation would be anticipated to maintain archaeological and paleontological issues to relatively insignificant levels.

Transportation

The overall development square footage for this alternative would be the same as for the proposed project. Conceivably, levels of automotive traffic generated would be expected to increase without the benefit of easy access to a regional transit hub.

Development at either the Playa Vista site or the Warner Center site would also involve a significant change in the regional traffic distribution and average trip length from what was anticipated with the proposed project. This can be exacerbated if housing is not readily available in those areas, thus forcing an automotive commute to the project, again in the absence of adequate transit options.

The Taylor Yard and Cornfield sites would generally represent a similar regional traffic distribution. While both could potentially benefit from available transit opportunities, neither is situated immediately adjacent to a major, multi-modal transit hub. Both the Taylor Yard and Cornfield sites may present localized access problems that would not be anticipated at the Warner Center or Playa Vista sites.

Impacts to traffic are potentially more significant with all four of the Alternate Site locations.

Population, Housing & Employment

Similar levels of employment, population and housing would be anticipated based on project size, regardless of location. However, impacts on housing may increase as the Alternative Sites are not located immediately adjacent to a major transit hub, thus reducing the opportunity for workers to commute from existing housing.

Air

The Alternate Site Location alternative would most likely result in increased levels of emissions from the proposed project. With either the Playa Vista or Warner Center sites, vehicle trip miles would increase due to lack of effective transit and/or increased average trip length. The Taylor Yard and Cornfield sites would also result in increases as transit could not serve the project as effectively. Increased emissions would come with the increased traffic impacts. The impact would remain significant. As with the project, microclimate and wind conditions can be accommodated with adequate design.

Noise

Each of the Alternate Site Locations are heavily influenced by traffic from existing freeways and roadways. In addition, the Playa Vista site has airport related noise issues to contend with, while the Taylor Yard and Cornfield sites have rail noise. Noise levels at the Taylor Yard site are already at the 65 dB level and are of concern to nearby residential areas.

Increased traffic levels associated with the project at an Alternate Site Location would result in increased noise levels. Increased traffic noise would be significant or potentially significant only if the noise-related traffic levels increased ambient levels by more than 3 dB, or if traffic-related noise increased ambient levels to a point which meets or exceeds threshold noise criteria for that particular location (based on surrounding uses). Noise issues, regardless of location, may be potentially significant. In the case of Taylor Yard, where noise levels are already at threshold levels for the surrounding residential uses, any increase in noise would be considered significant.

Earth

The impacts related to geologic hazards and grading would be similar to those described for the proposed project. Some sites may require special engineering considerations to accommodate development on varied soil types. With the exception of the Cornfield site, similar levels of

excavation and earth disturbance would be required. The Cornfield site would likely require more grading and excavation, due to the challenge of placing equal density on a smaller site (as per discussion of Alternative 6, Land Use/Transportation Policy alternative). With similar mitigations, these impacts would remain insignificant.

Water

Surface runoff is anticipated to increase at each of the alternate site locations, as none are known to be covered entirely with impermeable surfaces currently. With proper engineering measures, this is not anticipated to be significant. However, flood issues may need to be addressed at some of the alternate site locations, specifically Taylor Yard and Playa Vista.

Risk of Upset

Impacts relating to hazardous materials and risk of upset would vary considerably among the alternate sites, depending on location. Both the Taylor Yard and the Cornfield sites are anticipated to have need for some level of site remediation due to historic rail-related uses at both sites. With proper technical standards and engineering, these issues can be resolved to a level of insignificance.

Light & Glare/Shade & Shadow

The impacts of light and glare issues will vary depending on location. Lighting, and especially glare, may be a concern in the Playa Vista area, due to the LAX airport. It may also be a concern at the Taylor Yard, given its close proximity to residential uses. Shade and shadow may be relatively similar at all locations, but may be accommodated through design. At three of the sites, development may be spread to cover a larger area, hence reducing building heights. The exception to this would be with the Cornfield site, where development would most likely be higher than proposed for the project site. Hence, depending on the specific design, the level of significance may vary, but in general, could be more readily reduced at Playa Vista and Warner Center due to the increased opportunities of design flexibility, than at the proposed project site.

Public Services & Utilities

The Alternate Site Location alternative will generate similar demands on public services and utilities as discussed for the proposed project. The potential impact is dependent upon specific location. Impacts to police and fire services are still regarded as potentially significant. Solid waste would remain significant due to region-wide capacity problems.

Growth Inducing

The Alternate Site Location alternative can be viewed as one which provides a range of both housing and employment opportunities, with a greater emphasis on employment. Like the project, this alternative represents opportunities for significant economic growth through the physical development of an employment center. It is anticipated that these jobs will be filled by existing population throughout the Los Angeles basin.

Alternative 7 - Alternate Site Location Alternative Conclusions

The Alternate Site Location alternative, being of similar density and scale, presents an environmental impact scenario which is similar to the proposed project, but with variations depending on the specific location. In general, certain significant impacts, specifically those related to aesthetics (historical viewshed obstruction), cultural resources (historical resources) and shade/shadow may be reduced. Other impacts related to traffic, air quality, noise and potentially housing would most likely increase. Finally, benefits that the project would bring to the downtown civic center area would not be realized at Warner Center, Playa Vista or Taylor Yard, and would be realized to a lesser extent than the project at the Cornfield site.

The Alternate Site Location alternative potentially achieves one of the 14 objectives, specifically Objective 12. The remainder of the objectives are specific to the unique geographical and locational aspects of the project site. Based on overall impacts and ability to achieve objectives, no particular alternate site location presents an environmentally superior alternative.

SUMMARY OF ALTERNATIVES

Table 152 (Summary and Comparison of Alternatives/Alternatives Summary Matrix) provides an overview of the anticipated impacts of the proposed project and the seven alternatives which were considered. The seven alternatives are the No Project (Alt 1), the More Housing (Alt 2), the Sports Arena, Urban Entertainment Complex and Housing (Alt 3), the Community Plan (Alt 4), the Reduced Density (Alt 5), the Land Use/Transportation Policy (Alt 6), and the Alternate Site Location (Alt 7).

The top portion of the table provides a summary of the relative physical characteristics for each alternative. These numbers were used in the evaluation and comparison of the alternatives. The lower portion of the table summarizes the findings for the alternatives. The symbol in the column provides a relative comparison of impact to the proposed project. A plus (+) indicates that overall, the alternative impact would be greater than that for the proposed project. A minus (-) indicates that

compared to the proposed project, the alternative would have less of an impact. A zero (o) means that both the alternative and the project would have a similar level of impact.

Following the impact summary table is the Objectives Comparison Matrix (Table 153) which indicates the effectiveness of each alternative at meeting the proposed objectives.

ENVIRONMENTALLY SUPERIOR ALTERNATIVE

The Reduced Density alternative (Alternative 5) stands out as the environmentally superior project. However, the reduced density project meets only seven of the project objectives. It does not allow the project developer to capitalize on economy of scale features which would enhance the project and community and could result in more surface parking lots, with reduced opportunity for pedestrian friendly open space and courtyards. The Reduced Density alternative also does not maximize the public's investment in the transit system, and therefore, does not achieve public policy goals to the extent that the proposed project or Alternative 2 (More Housing), Alternative 3 (Sports Arena/Urban Entertainment Complex and Housing) and Alternative 6 (Land Use/Transportation Policy) would. The City's Land Use/Transportation Policy provides minimum and maximum FARs that are desirable to operate a transit center site to the greatest extent of that site's capabilities. The Reduced Density alternative represents a 44 percent FAR reduction from the ADP and is substantially below the minimum desirable FAR targeted for the site by the City's policy. In addition, it would not create as many direct or indirect short-term and long-term jobs as the proposed project, resulting in significantly less economic benefit to the City and region. Beneficial contributions to the community and the region are decreased under this alternative.

**TABLE 152
ALTERNATIVES SUMMARY MATRIX
(COMPARISON OF IMPACTS AT BUILDOUT¹)**

Alternative Characteristics	PROJECT	ALT 1 (No Project)	ALT 2 (More Housing)	ALT 3 (Sports Arena)	ALT 4 (Community Plan)	ALT 5 (Reduced Density)	ALT 6 (LU/Trans. Policy)	ALT 7 (Alternate Site)
Total Square Feet	10,960,700	965,800	10,960,700	10,960,700	9,220,700	6,155,700	15,350,700	10,960,700
Projected F.A.R.	3.57:1	na	3.57:1	3.57:1	3:1	2:1	5:1	3.57:1
Total Office-type Use Square Feet ²	9,192,000 (83%)	723,500 (75%)	7,157,000 (65%)	7,422,000 (68%)	7,057,000 (77%)	5,082,000 (83%)	11,207,000 (73%)	9,192,000 (83%)
Total Housing Units	300	0	1,300	1,200	0	100	700	300
Total Job Opportunities	39,998		33,424	35,776	37,609	22,656	52,621	39,998
Total Fulltime (Residential) Population	840	0	3,640	1,503	0	280	1,960	840
LAND USE								
	I	-I	-I	-I	+P	+P	o/I	+P
AESTHETICS								
	S	-I	o/S	+S	+S	-P	+S	-P
CULTURAL								
Archaeological	I	-I	o/I	o/I	o/I	-I	o/I	o/I
Paleontological	I	-I	o/I	o/I	o/I	-I	o/I	o/I
Historical	S	-I	o/S	+S	o/S	-P	+S	-P
TRANSPORTATION								
Traffic	S	+S	o/S	+S	-S	-S	+S	+S
Parking	I	-I	+I	-I	-I	-I	+P	+P
Access	S	-I	o/S	o/S	o/S	+S	o/S	o/P
POPULATION/HOUSING⁴								
Employment	I	-I	-I	+I	+I	+I	-I	o/I
Housing	I	-I	-I	+I	+I	+I	-I	o/I
Population (Full-time Residential)	I	-I	+I	-I	-I	-I	+I	o/I

**TABLE 152
ALTERNATIVES SUMMARY MATRIX
(COMPARISON OF IMPACTS AT BUILDOUT¹)**

Alternative Characteristics	PROJECT	ALT 1 (No Project)	ALT 2 (More Housing)	ALT 3 (Sports Arena)	ALT 4 (Community Plan)	ALT 5 (Reduced Density)	ALT 6 (LU/Trans. Policy)	ALT 7 (Alternate Site)
AIR								
Air Quality	S	-/S	+/S	-/S	-/S	-/S	+/S	+/S
Meteorology (Wind)	I	-/I	o/I	o/I	o/I	o/I	o/I	o/I
NOISE	I	-/I	+/P	+/P	-/I	-/I	-/I	+/P
EARTH								
Geological Hazards (Seismic)	I	-/I	o/I	o/I	o/I	o/I	+/I	o/I
Grading	I	-/I	o/I	o/I	o/I	-/I	+/I	o/I
SURFACE WATER (Hydrology)	I	+/I	o/I	o/I	o/I	o/I	o/I	+/P
RISK OF UPSET (Hazardous Materials)	I	-/I	o/I	o/I	o/I	o/I	+/I	+/P
LIGHT & GLARE/SHADE & SHADOW								
Artificial Light	I	-/I	o/I	+/P	o/I	-/I	+/P	o/P
Natural Light	P	-/I	o/P	o/P	o/P	-/I	+/P	-/P
PUBLIC SERVICES								
Fire Protection	P	-/I	o/P	+/P	-/P	-/P	+/S	o/P
Police Protection	P/S	-/I	o/P	+/P	-/P	-/P	+/S	o/P
Schools	I	-/I	+/P	+/P	-/I	-/I	+/I	o/I
Parks & Recreation	I	-/I	+/P	+/P	-/I	-/I	+/I	o/I
Libraries	I	-/I	+/P	+/P	-/I	-/I	+/I	o/I
UTILITIES								
Water	I	-/I	o/I	o/I	-/I	-/I	+/I	o/I
Solid Waste	S	-/I	o/S	+/S	-/S	-/S	+/S	o/S
Sewer	I	-/I	o/I	o/I	-/I	-/I	+/I	o/I
Energy	I	-/I	o/I	+/I	-/I	-/I	+/I	o/I
GROWTH INDUCEMENT	I	-/I	o/I	o/I	o/I	-/I	+/I	o/I
OBJECTIVES WHICH WOULD BE MET	1-14	0	1-14	1-14	13	2, 4, 5, 9, 11, 13	1-14	12

**TABLE 152
ALTERNATIVES SUMMARY MATRIX
(COMPARISON OF IMPACTS AT BUILDOUT¹)**

Alternative Characteristics	PROJECT	ALT 1 (No Project)	ALT 2 (More Housing)	ALT 3 (Sports Arena)	ALT 4 (Community Plan)	ALT 5 (Reduced Density)	ALT 6 (LU/Trans. Policy)	ALT 7 (Alternate Site)
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KEY:

- I - Insignificant or less than significant
- S - Significant and adverse
- P - Potentially significant or assumed to be significant under certain conditions

- measurably or assumed reduced level of impact relative to the proposed project (less impact)
- + - measurably or assumed greater level of impact relative to the proposed project (more impact)
- o - no measurable change in level of impact relative to the proposed project (same impact)

- 1 - Assumes buildout with similar level of mitigation incorporated.
- 2 - Includes adaptive reuse, commercial and governmental office uses.
- 3 - These figures are estimated and calculated for comparative purposes only. Assumes 4 persons/1,000 s.f. office use and 3 persons/1,000 s.f. of project identified retail use (exclusive of ground floor retail assumptions). Although it is acknowledged that the remaining uses (museum, hotel, conference center, etc.) will contribute to the daytime equivalent population, their contribution is not included in this comparative analysis.
- 4 - Population/Housing/Employment impacts are considered here within the context of regional growth, housing, employment and land use forecasts. In general, these goals tend to support employment/economic growth, an increase in a diversified housing stock with a leniency toward affordable housing costs, a balanced mix of land use in urbanized nodes, and minimal population growth. Hence, an increase in employment opportunities or housing would be considered for purposes of this comparative analysis as positive, while population increases, although not necessarily adverse, are less desirable. Hence a (-) symbol for housing would indicate that either more total housing (or a better balance) of housing is provided thereby better striving toward regional housing goals and resulting in a "reduced" impact relative to the proposed project.

**TABLE 153
ALTERNATIVES OBJECTIVES ACHIEVEMENT MATRIX**

Project Objectives	PROJECT	ALT 1 (No Project)	ALT 2 (More Housing)	ALT 3 (Sports Arena)	ALT 4 (Community Plan)	ALT 5 (Reduced Density)	ALT 6 (L.U/Trans. Policy)	ALT 7 (Alternate Site)
1. To preserve and enhance the Terminal Annex and Union Station Buildings and the most significant surrounding architectural and historical, and visual resources on the site while integrating amenities which support area residents, employees or visitors from throughout the region.	Yes	No	Yes	Yes	No	No	Yes	No
2. To enhance the regional transportation hub at Union Station by encouraging the use of public transit, increasing the availability of the transportation center, and providing pedestrian connections from the Alameda District to the surrounding neighborhoods and the downtown area.	Yes	No	Yes	Yes	No	Yes	Yes	No
3. To provide a center of economic development at the ADP site and adjacent to the Civic Center, comprised of new commercial and government offices, hotels, cultural and entertainment services and retail stores that will complement and support existing and future business activities.	Yes	No	Yes	Yes	No	No	Yes	No
4. To develop and revitalize a mixed-use commercial/residential environment which builds upon the rich cultural and architectural heritage of the Central City North area and links downtown and adjacent communities.	Yes	No	Yes	Yes	No	Yes	Yes	No

**TABLE 153
ALTERNATIVES OBJECTIVES ACHIEVEMENT MATRIX**

Project Objectives	PROJECT	ALT 1 (No Project)	ALT 2 (More Housing)	ALT 3 (Sports Arena)	ALT 4 (Community Plan)	ALT 5 (Reduced Density)	ALT 6 (U/Trans Policy)	ALT 7 (Alternate Site)
5. To build upon and complement the cultural character of Chinatown, Olvera Street and Little Tokyo by creating a distinctive pedestrian and tourist oriented commercial focus at the ADP site.	Yes	No	Yes	Yes	No	Yes	Yes	No
6. To implement the City's Land Use/Transportation Policy by coordinating and concentrating employment and development around the region's transportation hub.	Yes	No	Yes	Yes	No	No	Yes	No
7. To maintain and enhance the economic vitality of the City of Los Angeles by providing business and job opportunities associated with the construction and occupancy of buildings in the Alameda District.	Yes	No	Yes	Yes	No	No	Yes	No
8. To concentrate higher densities and intensities of land use in the Transit Office Core Planning Area within the ADP site with transit accessible buildings which maximize the use of the transit facilities and high occupancy vehicles, and reduce reliance on single-occupancy automobile transportation.	Yes	No	Yes	Yes	No	No	Yes	No
9. To minimize impacts on public health, safety and environmental quality by reducing motor vehicle emissions by facilitating transit and by creating a more efficient urban form at the ADP site.	Yes	No	Yes	Yes	No	Yes	Yes	No

**TABLE 153
ALTERNATIVES OBJECTIVES ACHIEVEMENT MATRIX**

Project Objectives	PROJECT	ALT 1 (No Project)	ALT 2 (More Housing)	ALT 3 (Sports Arena)	ALT 4 (Community Plan)	ALT 5 (Reduced Density)	ALT 6 (L.U/Trans Policy)	ALT 7 (Alternate Site)
10. To create a planned urban development which includes a transition in scale, height, and density within the Alameda District.	Yes	No	Yes	Yes	No	Yes	Yes	No
11. To adopt parking requirements for the ADP, appropriate to high density transit areas including shared use parking and minimum/maximum on-site parking ratios which are reduced as the transit system matures.	Yes	No	Yes	Yes	No	Yes	Yes	No
12. To provide public art designed to be compatible with the character and context of existing communities, and to create community facilities and amenities such as child care, bicycle storage facilities, open space, plazas, street trees, special street lighting, special paving and street amenities.	Yes	No	Yes	Yes	No	No	Yes	Yes
13. To develop an on-site roadway network within the ADP site which facilitates internal site circulation and minimizes interference with pedestrian and transit access.	Yes	No	Yes	Yes	Yes	Yes	Yes	No
14. To provide a viable project which promotes the City's economic well-being and recognizes the investment of the project proponents in the properties that comprise the Alameda District Plan.	Yes	No	Yes	Yes	No	No	Yes	No

KEY: No Does not fully acheive objective.
Yes Fully acheives objective.