

5.0 ALTERNATIVES

CEQA requires that an EIR objectively evaluate a “reasonable” range of alternatives. According to the CEQA Guidelines Section 15126.6(a), “an EIR shall describe a range of reasonable alternatives to the proposed project, or to the location of the proposed project, which would feasibly attain most of the basic objectives of the proposed project, but would avoid or substantially lessen any of the significant effects of the proposed project, and evaluate the comparative merits of the alternatives.” The CEQA Guidelines also state that an EIR need not consider every conceivable alternative nor consider alternatives that are infeasible. Under CEQA, the factors that can determine feasibility are site suitability, economic limitations, availability of infrastructure, General Plan consistency, other plan or regulatory limitations, and jurisdictional boundaries. An EIR need not consider an alternative whose effects cannot be reasonably ascertained and whose implementation is remote and speculative.

The alternatives analysis must also include a comparative evaluation of the No Project Alternative per Section 15126.6(e) of the CEQA Guidelines. Through comparison of the alternatives, the advantages and disadvantages of each alternative compared with the proposed project can be weighed and analyzed. The No Project Alternative is described subsequently.

5.1 PROJECT OBJECTIVES

The primary objectives of the proposed project include the following:

- Express the interwoven histories and the multi-cultural significance of the LASHP site, while satisfying a broad range of year-round recreational opportunities.
- Establish a major public open space and destination for future generations to celebrate the past, present, and future of Los Angeles.
- Ensure that the pedestrian-friendly public realm of the park seamlessly extends to the park’s boundaries and includes flexible spaces for special events, markets, and festivals.
- Position the LASHP within the 21st Century context and allow it to remain compatible with evolving technologies and to incorporate those future cultural histories as they develop.
- Provide for the health, inspiration, and education of the public by helping to preserve valued cultural resources, and creating opportunities for high-quality outdoor recreation while protecting and stabilizing significant cultural resources and recreated natural habitats within the park.
- Engage both nature and culture in creating a regional gathering space around the theme of a larger, more diverse Los Angeles history, which reconnects the City to the Los Angeles River.

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- Provide visitor use facilities that offer the opportunity for diverse visitor experiences, maximizing visitor and staff use while minimizing negative effects on viewsheds, cultural or natural resources, or other conflicts.

5.2 ALTERNATIVES CONSIDERED BUT ELIMINATED

Section 15126.6(c) of the CEQA Guidelines requires that an EIR identify any alternatives that were considered by the lead agency, but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination. Among factors that may be used to eliminate alternatives from detailed consideration in the EIR are: (1) failure to meet most of the basic project objectives, (2) infeasibility, and (3) inability to avoid significant environmental impacts.

5.2.1 ALTERNATIVE SITES

Section 15126.6(f)(2) of the CEQA Guidelines requires that an EIR consider alternative locations to the project site. Locating the proposed project on an alternative site would not accomplish the basic project objectives, which are site-specific to the project site. Constructing a new park at an alternative site or implementing the proposed project at another existing park within the area would not implement the vision of the LASHP General Plan/EIR and related documents. The proposed project and the project objectives are site-specific with the basic premise being the improvement of the existing LASHP site at its specific location. This alternative would not meet any of the objectives of the proposed project and was eliminated from consideration.

5.3 ALTERNATIVES CARRIED FORWARD FOR DETAILED ANALYSIS

Three alternatives have been carried forward for detailed analysis in this EIR, including the "No Project" alternative as required by CEQA. Based on the environmental analysis conducted for the proposed project, significant impacts requiring mitigation have been identified regarding Biological Resources, Cultural Resources, Geology and Soils, and Hazards and Hazardous Materials. The EIR identified less than significant impacts for Aesthetics, Air Quality, Greenhouse Gas Emissions, Hydrology and Water Quality, Population and Housing, Public Services and Utilities, and Transportation and Traffic. Significant and unavoidable impacts were identified for Noise.

The alternatives carried forward for detailed analysis in this section include:

- No Project Alternative
- High Intensity Master Plan Alternative
- Resource Protection Alternative

5.3.1 OVERVIEW OF ALTERNATIVES AND IMPACTS

The table at the end of this chapter provides a comparison of the impacts of the alternatives to the proposed project. In accordance with the CEQA Guidelines Section 15126.6(d), each alternative was evaluated in sufficient detail to determine whether the overall environmental impacts would be less, similar, or greater than the corresponding impacts of the proposed project. However, the alternatives are not analyzed at the same level of detail as the proposed project. A discussion of each alternative is provided below.

5.3.2 NO PROJECT ALTERNATIVE

According to the CEQA Guidelines Section 15126.6(e)(3)(b), the No Project Alternative is defined as the “circumstance under which the proposed project does not proceed.” The impacts of the No Project Alternative shall be analyzed “by projecting what would reasonably be expected to occur in the foreseeable future if the proposed project were not approved, based on current plans and consistent with available infrastructure and community services.” The purpose of describing and analyzing the No Project Alternative is “to allow decision makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project.” Under the No Project Alternative, the proposed development of the 32-acre project site, including various event spaces, observation and interpretive areas, recreation areas and pathways, parking, constructed wetlands and habitat area, as well as park furnishings and infrastructure would not be completed on the project site. Because these improvements would not be implemented, the design goals and vision of the LASHP General Plan/EIR would not be realized. Under the No Project Alternative, the IPU park would continue to operate as under existing conditions. Future environmental conditions would be unchanged from those that currently exist, which are described in the environmental setting sections of Chapter 3.0. The No Project Alternative would not fully meet any of the project objectives.

Temporary construction impacts associated with aesthetics, air quality, biological resources, cultural and paleontological resources, hazards and hazardous materials, noise, public services and utilities, and transportation and traffic would be avoided with the No Project Alternative because no construction activities would occur on the project site under the No Project Alternative. The existing use of the project site would continue to function and operate as with existing conditions. As with existing conditions, maintenance activities would occur as needed to maintain the existing project site. The project site would not be closed, fenced, and visually altered as a construction site, contributing to temporary aesthetic and public service impacts. There would be no temporary traffic impacts related to the truck trips required for the transport of materials to and from the project site. No construction air quality and noise impacts would occur due to on-site construction activities because no construction activities would occur. In addition, the temporary impacts to biological resources from the construction activities on the project site would not occur. Further, the potential for uncovering previously unknown archaeological or paleontological resources would be avoided because grading would not take place on the project site. No hazards or hazardous materials would be encountered due to the lack of grading activities.

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Operational impacts would be avoided because no changes to the project site would occur under the No Project Alternative. As the proposed project would not substantially alter the operations of the project site, the No Project Alternative would have similar impacts as the proposed project during the operational phase. The number of vehicles trips to and from the project site would not be expected to change because the same uses would be operating at the project site. Thus, similar to the proposed project, no increase in special events noise would be expected to occur. No potential permanent changes to cultural resources would occur because the project site would not be altered. No constructed wetlands would be included, resulting in lower quality and higher maintenance of stormwater on the project site as compared to the proposed project. Under the No Project Alternative, the design goals and vision of the LASHP General Plan/EIR would not be implemented. Further, the No Project Alternative would not fully achieve any of the objectives of the proposed project.

5.3.3 HIGH INTENSITY MASTER PLAN ALTERNATIVE

The High Intensity Master Plan Alternative, although similar to the proposed project, would result in the increased programming of the project site as compared to the proposed project. This alternative includes interpretive gardens, habitat areas, interpretive play area, a civic water feature, a "fountain" bridge spanning the project site and connecting to Broadway, multi-use lawn spaces, a 5,600-square-foot Welcome Station/cafe, a 14,000-square-foot ecology center including a restaurant, a performance stage, public parking, interpretive and recreational trails, and the excavation of the northern end of the project site to establish a direct physical connection with the Los Angeles River. In addition, large public and operations facilities would be included on-site. This alternative would create iconic attractions for the park. Due to the increased intensity of development, the construction phase of this alternative would be longer in duration as compared to the proposed project. The construction activities and processes required with this alternative would be similar to the proposed project, except there would be an increase in the intensity of excavation and grading. During operations there would likely be an increase in new vehicle trips as compared to the proposed project, as the increase of development intensity may accommodate and attract more visitors.

Similar to the proposed project, the High Intensity Master Plan Alternative would result in temporary impacts during the construction phase. The construction phase associated with this alternative would be longer in duration than with the proposed project. The visual character of the project site would be substantially altered during the construction phase. This visual change would be greater as compared to the proposed project due to the larger areas of excavation required that would be visible to project area residents, passing motorists, and pedestrians. Construction air quality, GHG, and noise impacts would be greater with this alternative because of the longer construction phase, the need for additional truck trips, and increased construction equipment use due to the larger areas of excavation activities associated with the physical connection to the Los Angeles River. The potential to uncover or disturb cultural and archaeological resources, as well as paleontological resources would be greater as a result of the higher intensity of construction, grading, and excavation activities required with this alternative. Impacts to geology and soils, as well as hydrology and water quality would potentially be greater because of the increased excavation activities. In order to connect the project site to the Los Angeles River, excavation

would have to extend relatively deep, resulting in increased potential impacts to geology and soils, and hydrology and water quality. In addition, the potential of encountering unknown hazardous materials may increase with the larger and deeper excavation areas that would be required for the construction of this alternative. Construction impacts related to public services and utilities would be greater than with the proposed project due to the longer duration of the construction phase, which would result in a longer park closure period. Construction impacts related to transportation and traffic may be greater than with the proposed project due to the additional construction truck and worker trips required.

The operational phase of the High Intensity Master Plan Alternative would be similar to the proposed project. The visual character of the project site would not be substantially altered as compared to the proposed project, except for the inclusion of larger buildings and a larger elevated walkway/bridge. Similar to the proposed project, it is not expected that the buildings included with this alternative would be large enough to block views of the downtown Los Angeles skyline. Operational air quality, GHG, and noise impacts would be greater with this alternative because of the increased intensity of development that would likely attract and accommodate additional visitors and events as compared to the proposed project. Similar to the proposed project, special events including fireworks displays and amplified sound would be included with this alternative. As such, these particular noise impacts would be similar to the proposed project, significant and unavoidable. Similar to the proposed project, the constructed wetlands included with this alternative would assist in improving the stormwater runoff water quality on-site. Cultural and archaeological resources would be protected from harm during the operational phase, similar to the proposed project. Operational impacts related to transportation and traffic may be greater than with the proposed project due to the increased intensity of development proposed with this alternative, potentially resulting in a larger number of visitors traveling to the project site.

5.3.4 RESOURCE PROTECTION ALTERNATIVE

The Resource Protection Alternative would be identical to the proposed project. However, this alternative would reduce the scope and size of the project and would further protect known archaeological resources by fully covering the project site with an additional layer of soil where it is currently shallow or exposed. Similar to the proposed project, the Welcome Station building, operations building, elevated walkway and Roundhouse Observation Deck would be included with this alternative. However, no archaeological features would be exposed during the operational phase. In addition, no constructed wetlands would be included with this alternative. The construction phase required with this alternative would be similar to the proposed project.

Similar to the proposed project, the Resource Protection Alternative would result in temporary impacts during the construction phase. The visual character of the project site would be altered during the construction phase. Construction air quality, GHG, and noise impacts would be similar to the proposed project because of the similar length of construction phase duration, number of truck and worker trips, and construction equipment use. Potential impacts to cultural and archaeological resources, as well as paleontological resources would be lower as a result of the additional layer of soil included with this alternative. Construction impacts related to transportation and traffic may be less than the proposed

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project due to the lack of constructed wetlands, which would necessitate an increased number of construction truck trips.

The operational phase of the Resource Protection Alternative would be similar to the proposed project. The visual character of the project site would not be substantially altered as compared to the proposed project. Similar to the proposed project, it is not expected that the buildings included with this alternative would be so large as to block views of the downtown Los Angeles skyline. Operational air quality, GHG, and noise impacts would be similar with this alternative because of the similar intensity of development as compared to the proposed project. Similar to the proposed project, special events including fireworks displays and amplified sound would be included with this alternative. As such, these particular noise impacts would be similar to the proposed project. Unlike the proposed project, no constructed wetlands would be included with this alternative to assist in improving the stormwater runoff water quality on-site. As such, impacts related to hydrology and water quality would be greater than with the proposed project. The additional layer of soil would result in the increased protection of cultural and archaeological resources from harm during the operational phase. Unlike the proposed project, this alternative would not include any areas of exposed archaeological resources. Operational impacts related to transportation and traffic would be similar to the proposed project as this alternative would include the same amount of special events space as the proposed project.

5.4 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

The “No Project” alternative would be the environmentally superior alternative primarily because no construction activities would occur on the project site. However, this alternative would not fully meet any of the project objectives or implement the vision of the LASHP General Plan/EIR. In accordance with Section 15126.6(e) (2) of the CEQA Guidelines, if the environmentally superior alternative is the No Project Alternative, then the EIR shall also identify an environmentally superior alternative among the other alternatives. Table 5-1 provides a comparison of the impacts of the alternatives to the proposed project. The Resource Protection Alternative would reduce cultural resources impacts as compared to the proposed project. This alternative would result in greater impacts in one environmental issue area, and less impacts in one environmental issue area. The High Intensity Master Plan Alternative would not reduce impacts in any environmental issue area as compared to the proposed project. This alternative would result in greater impacts in 10 environmental issue areas. Both the alternatives would result in greater impacts in at least one environmental issue area. As such, the proposed project would be considered the environmentally superior alternative.

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TABLE 5-1 COMPARISON OF IMPACTS FOR THE PROPOSED PROJECT AND ALTERNATIVES

Impact Area	Proposed Project	No Project Alternative	High Intensity Master Plan Alternative	Resource Protection Alternative
Aesthetics	III	IV (Less)	III (Greater)	III (Similar)
Air Quality: Construction	III	IV (Less)	III (Greater)	III (Similar)
Operation	III	IV (Less)	III (Similar)	III (Similar)
Biological Resources	II	IV (Less)	II (Greater)	II (Similar)
Cultural Resources	II	IV (Less)	II (Greater)	II (Less)
Geology and Soils	III	IV (Less)	III (Greater)	III (Similar)
Greenhouse Gas Emissions	III	IV (Less)	III (Greater)	III (Similar)
Hazards and Hazardous Materials	II	IV (Less)	II (Greater)	II (Similar)
Hydrology and Water Quality	III	III (Greater)	II (Greater)	II (Greater)
Noise/Vibration: Construction	III	IV (Less)	II (Greater)	III (Similar)
Operation	I	IV (Less)	I (Similar)	I (Similar)
Population and Housing	III	IV (Less)	III (Similar)	III (Similar)
Public Services and Utilities	III	IV (Less)	III (Similar)	III (Similar)
Transportation and Traffic	III	IV (Less)	II (Greater)	III (Similar)

Notes:

I: Significant Unavoidable Impact

II: Potentially Significant Impact Unless Mitigated

III: Less Than Significant Impact

IV: No Impact

Less: Impact is lower in magnitude than impacts of the proposed project

Similar: Impact is similar in magnitude to impacts of the proposed project

Greater: Impact is greater in magnitude than impacts of the proposed project

Mixed: Some impacts are less than, similar to, and/or greater in magnitude than impacts of the proposed project

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