

2.0 SUMMARY

This section summarizes the alternatives assessed in this Environmental Assessment/Environmental Impact Report (EA/EIR) and also identifies the environmental impacts, mitigation measures, and residual impacts associated with the alternatives.

2.1 PROJECT ALTERNATIVES

Alternative 1 – No Project Alternative

According to Section 4102.14(d) of the Council of Environmental Quality (CEQ) Regulations for Implementing the National Environmental Policy Act (NEPA), and Section 15126.6(e) of the California Environmental Quality Act (CEQA), a No Action/No Project Alternative (hereafter referred to as Alternative 1) must be evaluated. The purpose of Alternative 1 is to consider the effect of maintaining existing conditions. Alternative 1 addresses what would reasonably be expected to occur in the foreseeable future if neither Alternative 2 nor Alternative 3 are approved and implemented.

Alternative 2 – Repair and Reuse Alternative (Proposed Alternative)

The proposed repair and reuse alternative (Alternative 2) would include repairing the Hall of Justice by seismically retrofitting the earthquake-damaged building into a useable office building while preserving and restoring selected historic features. Alternative 2 would include the repair of the interior of the Hall of Justice building to provide 325,000 square feet of useable office space, the development of a new multi-level garage with 1,000 parking spaces on the site, landscape and hardscape improvements, architectural and security lighting, and necessary upgrades to utility systems. In addition, Alternative 2 would include the restoration of the core and shell elements of this building, and the cleaning, refurbishing, and repair of the historic exterior wall materials, and certain historically significant interior areas.

The County of Los Angeles has determined that this alternative would occur in eight phases. These would include Phase I Debris Removal: Removal of loose material, debris, and furniture from the building (phase has been completed); Phase II Interior Demolition Design: Architectural/engineering services to prepare design documents for interior demolition work (phase has been completed); Phase III Interior Demolition: Perform interior non-structural demolition activities; Phase IV Rehabilitation Design: Architectural/engineering services to prepare design documents for structural retrofit work and rehabilitation work, including the installation of new building utility systems, tenant improvements, and performance of retrofit work; Phase V Bidding Rehabilitation Work: Bid rehabilitation work; Phase VI Rehabilitation Adaptive Reuse Construction: Perform rehabilitation work; Phase VII Tenant

Improvements: Bid and construct tenant improvement scope; and Phase VIII Move in/Start Up/Close Out: Tenant departments take occupation of the building. The Draft EA/EIR examined the whole project, as included within these phases, and has considered the environmental impact of the whole project. The phasing of the project would not result in any additional impacts or require any additional mitigation measures to resolve environmental impacts beyond those described in the Final EA/EIR. The County of Los Angeles would implement the project per the phasing scheme and provide funding for each phase of the project individually, as it is needed. It should be noted that while Phase I and II are identified as a part of the project, it can be seen with certainty that there is no possibility that such activities would have significant effect on the environment, and hence are not subject to CEQA.

Alternative 3 – Adaptive Reuse of the Existing Building to Secretary of Interior Standards

Alternative 3 would include repair of the Hall of Justice, per the Secretary of the Interior’s Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings. In other words, all character-defining historic features and elements of the building would remain entirely intact under this alternative. Alternative 3 would include the repair of the interior of the Hall of Justice building to provide for 199,132 square feet of useable “Class A” office space, the development of a new multi-level garage with 1,000 parking spaces, landscape and hardscape improvements, architectural and security lighting, and necessary upgrades to utility systems. In addition, Alternative 3 would include the cleaning, refurbishing and repair of the historic exterior wall materials.

2.2 ALTERNATIVES EVALUATION MATRIX

As indicated previously, three alternatives were considered in this EA/EIR. **Table 2.0-1, Summary of Project Alternative Impacts**, represents an alternative evaluation matrix that compares the environmental and socioeconomic effects of these three alternatives. The environmental and socioeconomic topics summarized included in **Table 2.0-1** are discussed in detail in Section 4.0, Affected Environment and Potential Impacts of the Alternatives Considered, of the Draft EA/EIR.

**Table 2.0-1
Summary of Project Alternative Impacts**

Environmental Impact	Mitigation Measures	Residual Impact
GEOLOGY AND SOILS		
<p>Alternative 1</p> <p>Under the No Project Alternative, the project site would remain in its present state. No impacts to geology and soils would occur with the implementation of this alternative.</p>	No mitigation measures are required.	Less Than Significant.
<p>Alternative 2</p> <p>Impacts associated with surface fault rupture, landslides, seismically induced settlement, tsunami, seiches, and earthquake-induced flooding would be less than significant. Faulting and seismic ground shaking impact would be reduced to a less than significant level through retrofitting the building and development of the new parking garage per Uniform Building Code (UBC) standards. Expansive soil impact would be reduced through adherence to the recommendations contained within the geotechnical report.</p>	<p>GS-1 All structures shall be designed in accordance with the UBC and applicable County codes to ensure safety in the event of an earthquake.</p> <p>GS-2 All recommendations contained in the project geotechnical engineering report shall be incorporated into the project to minimize impacts associated with site grading and structural design.</p>	Less Than Significant.
<p>Alternative 3</p> <p>Impacts associated with surface fault rupture, landslides, seismically induced settlement, tsunami, seiches, and earthquake-induced flooding would be less than significant. Faulting and seismic ground shaking impact would be reduced to a less than significant level through retrofitting the building and development of the new parking garage per UBC standards. Expansive soil impact would be reduced through adherence to the recommendations contained within the geotechnical report.</p>	Same mitigation measures as identified for Alternative 2.	Less Than Significant.
TRAFFIC/CIRCULATION		
<p>Alternative 1</p> <p>Under this alternative, the Hall of Justice building would remain vacant and would not generate construction or operational traffic.</p>	No mitigation measures are required.	Less Than Significant.

Environmental Impact	Mitigation Measures	Residual Impact
TRAFFIC/CIRCULATION (continued)		
<p>Alternative 2</p> <p>Construction</p> <p>Following the addition of Alternative 2 -related traffic, the increase in the Critical Movement Analysis (CMA) delay at the signalized key intersections would range from 0.003 to 0.055 seconds. These changes in average control delay would be insufficient to change the peak hour levels of service at any of the signalized key intersections and would not result in an increase in the CMA value that exceed significance threshold levels. Impacts under this alternative during construction are considered to be less than significant.</p> <p>No parking impacts from construction-related vehicles are expected to occur on the surrounding streets. All construction-related vehicles, including construction worker vehicles, would be parked on the project site. On-street parking is in high demand in the project site area. If during peak construction activity-parking demand cannot be adequately accommodated on site, then a parking plan involving an off-site location would be implemented for the affected work crew.</p>	<p>In order to ensure construction activity does not interfere with weekday activities, the following measures are required:</p> <p>T-1 Trucks and construction materials and equipment shall be staged on site, whenever feasible. If additional space is necessary it is required that lane closure plans be submitted to the County and City of Los Angeles for approval.</p> <p>T-2 Temporary “Truck Crossing” warning signs shall be placed in each direction in advance of each site driveway used by construction vehicles.</p> <p>T-3 A flag person or persons shall be positioned at the project site to assist truck operators in entering and exiting the project area, and to help minimize conflicts with other motorists.</p> <p>T-4 To the greatest extent possible, heavy-duty construction trucks shall be scheduled to arrive and depart before and after peak commuting periods of 7:00 AM to 10:00 AM and 4:00 PM to 7:00 PM.</p> <p>T-5 A construction worker ridesharing plan shall be implemented to reduce construction-related trips.</p> <p>T-6 An off-site parking area for construction workers personal vehicles shall be established during peak construction activity days/time periods when all worker vehicles cannot be accommodated on site.</p> <p>T-7 Once a site has been identified for hauling excess dirt, a haul route shall be developed which keeps trucks on major boulevards. The haul route shall be reviewed and approved by the County and City.</p>	<p>Less Than Significant.</p>

Environmental Impact	Mitigation Measures	Residual Impact
TRAFFIC/CIRCULATION (continued)		
<p>Alternative 2 (continued)</p> <p>Operational</p> <p>Under this alternative, the signalized key intersections would provide acceptable levels of service in the year 2005 (LOS C or better). Following the addition of Alternative 2-related traffic, the increase in the CMA delay at the signalized key intersections would range from 0.003 to 0.027. These changes in average control delay would be insufficient to change the peak hour levels of service at any of the signalized key intersections and would not result in an increase in the CMA value that exceed significance threshold levels.</p>	<p>No mitigation measures are required.</p>	<p>Less Than Significant.</p>
<p>Alternative 3</p> <p>Construction</p> <p>Following the addition of Alternative 3-related traffic, the increase in the CMA delay at the signalized key intersections would range from 0.003 to 0.055. These changes in average control delay would be insufficient to change the peak hour levels of service at any of the signalized key intersections and would not result in an increase in the CMA value that exceed significance threshold levels. Impacts under this alternative during construction are considered to be less than significant.</p> <p>No parking impacts from construction-related vehicles are expected to occur on the surrounding streets. All construction-related vehicles, including construction worker vehicles, would be parked on the project site. On-street parking is in high demand in the project site area. If during peak construction activity-parking demand cannot be adequately accommodated on site, then a parking plan involving an off-site location would be implemented for the affected work crew.</p>	<p>Same mitigation measures as identified for Alternative 2.</p>	<p>Less Than Significant.</p>

Environmental Impact	Mitigation Measures	Residual Impact
TRAFFIC/CIRCULATION (continued)		
<p>Alternative 3 (continued)</p> <p>Operational</p> <p>Under Alternative 3, the Hall of Justice would be occupied with approximately the same amount of full-time employees (1,350) as under the 1994 conditions. Given that the traffic discount rates were applied for the previous occupancy of the building, this alternative would not result in a net increase in traffic.</p>	No mitigation measures are required.	Less Than Significant.
PUBLIC HEALTH & SAFETY/HAZARDOUS MATERIAL		
<p>Alternative 1</p> <p>Under Alternative 1, the Hall of Justice would remain vacant and unsafe for occupancy and would continue to deteriorate physically. Implementation of this alternative could result in long-term public health hazards due to the non-removal of existing on-site hazardous materials.</p>	No mitigation measures are required.	Less Than Significant.
<p>Alternative 2</p> <p>Impacts associated with Asbestos Containing Materials (ACM), Lead Containing Paint (LCP), Polychlorinated Biphenyls (PCBs), universal waste, biologically and bacterially affected materials/industrial hygiene waste would be significant. Radon gas impacts would be less than significant.</p>	<p>HS-1 Asbestos-containing materials shall be removed or encapsulated under acceptable engineering methods and work practices by a licensed asbestos abatement contractor. Removal practices include, but are not limited to containment of the area by plastic; negative air filtration; wet removal techniques; and personal respiratory protection and decontamination. The process shall be designed and monitored by a California Certified Asbestos Consultant. The abatement and monitoring plan shall be developed and submitted for review and approval by the appropriate regulatory agencies (currently the County of Los Angeles and South Coast Air Quality Management District [SCAQMD]).</p> <p>HS-2 Prior to the renovation of the building, all loose and peeling paint shall be removed and disposed of by a licensed and certified lead abatement contractor, in accordance with local, state, and federal regulations.</p>	Less Than Significant.

Environmental Impact	Mitigation Measures	Residual Impact
PUBLIC HEALTH & SAFETY/HAZARDOUS MATERIAL (continued)		
<p>Alternative 2 (continued)</p>	<p>HS-3 The abatement contractor shall be informed of which paint on the buildings shall be considered as containing lead. The contractor shall take appropriate precautions to protect his/her workers, the surrounding community, and to dispose of construction waste containing lead paint in accordance with local, state, and federal regulations.</p> <p>HS-4 All on-site fluorescent light ballasts shall be assumed to contain PCBs, unless labeled "Does Not Contain PCBs," and shall be removed prior to renovation activities and disposed of by a licensed and certified PCB removal contractor, in accordance with local, state, and federal regulations.</p> <p>HS-5 All on-site fluorescent light tubes, and electronic waste shall be assumed to contain heavy metals and shall be removed prior to renovation activities and disposed of by a licensed and certified abatement contractor, in accordance with local, state, and federal regulations.</p> <p>HS-6 All biological and bacterial waste shall be removed prior to renovation activities by trained and equipped personnel.</p> <p>HS-7 All medical waste, including spent needles, shall be properly categorized and removed by a trained and equipped personnel prior to renovation activities.</p> <p>HS-8 All spent and partially used containers of chemicals shall be categorized/classified (acids, bases, etc.), lab packed, manifested, and removed prior to renovation activities by a licensed and certified abatement contractor, in accordance with local, state, and federal regulations.</p>	
<p>Alternative 3</p> <p>Under this alternative, impacts associated with ACM, LCP, PCBs, universal waste, biologically and bacterially affected materials/industrial hygiene waste would be significant. Radon gas impacts would be less than significant.</p>	<p>Same as identified for Alternative 2.</p>	<p>Less Than Significant.</p>

Environmental Impact	Mitigation Measures	Residual Impact
SOCIO-ECONOMIC ISSUES/ENVIRONMENTAL JUSTICE		
Each federal agency is required to analyze the effects, including human health, economic and social effects, of federal actions, including effects on minority communities and low-income communities, when such analysis is required under the NEPA. As a general rule, CEQA only requires an analysis of the environmental impacts of a project. Economic and social effects of a project are not treated as significant effects on the environment. <i>CEQA Guidelines</i> , §15131(a).		
<p>Alternative 1</p> <p>Under Alternative 1, the Hall of Justice would remain vacant and unsafe for occupancy and would continue to deteriorate physically. Given the current condition of the building, a program would be required in order to observe and routinely inspect the building to ensure it posed no imminent threat or safety hazard to the surrounding environs. Implementation of this alternative would not result in short-term or long-term noise, air quality, or traffic impacts nor displaces or divides a community. Consequently, this alternative would result in less than significant impacts to minority or low-income individuals and would be consistent with Executive Order (EO) 12898.</p>	No mitigation measures are required.	Less Than Significant.
Each federal agency is required to analyze the effects, including human health, economic and social effects, of federal actions, including effects on minority communities and low-income communities, when such analysis is required under the NEPA. As a general rule, CEQA only requires an analysis of the environmental impacts of a project. Economic and social effects of a project are not treated as significant effects on the environment. <i>CEQA Guidelines</i> , §15131(a).		
<p>Alternative 2</p> <p>Construction of this alternative would result in short-term air, noise and traffic impacts as described in the respective sections of this document. According to NEPA Law and Litigation 8:49, temporary environmental effects including temporary disruption during construction activities “are not significant effects that require an environmental impact statement.” Consequently, construction would not cause significant environmental impacts to minority or low-income individuals and is consistent with the provisions of EO 12898.</p> <p>Operation of this alternative would result in long-term air, noise, and traffic impacts as described in the respective sections of this document. These impacts are considered to be less than significant. Consequently, the operation of the project would not cause significant environmental impacts to minority or low-income individuals and is consistent with the provisions of EO 12898.</p>	No mitigation measures are required.	Less Than Significant.

Environmental Impact	Mitigation Measures	Residual Impact
SOCIO-ECONOMIC ISSUES/ENVIRONMENTAL JUSTICE (continued)		
<p>Alternative 2 (continued)</p> <p>The project would not displace any on-site or off-site permanent residents and/or commercial businesses. In fact, this project may provide some short-term and long-term employment opportunities for minority and low-income individuals in the area by providing business/personal services to the building occupants. This, in turn, would provide for increased business opportunities adjacent to the project site, as well as outlying areas. In addition, the implementation of this alternative would have beneficial impacts on the surrounding neighborhoods through the provision of more efficient governmental services such as better security from the Sheriff locating an office within the Civic Center area. Another benefit of the project would include halting the physical deterioration of the Hall of Justice and surrounding neighborhood by repairing this facility. For the above reasons, the repair of Hall of Justice would not cause environmental injustice to minority or low-income individuals and is consistent with provisions of EO 12898.</p>		
<p>Each federal agency is required to analyze the effects, including human health, economic, and social effects, of federal actions, including effects on minority communities and low-income communities, when such analysis is required under the NEPA. As a general rule, CEQA only requires an analysis of the environmental impacts of a project. Economic and social effects of a project are not treated as significant effects on the environment. <i>CEQA Guidelines</i>, §15131(a).</p>		
<p>Alternative 3</p> <p>Socioeconomic and environmental justice issues under this alternative would be same as described for Alternative 2. Construction and operational noise air quality, and traffic impacts would be less than significant. This alternative would benefit the community by providing short-term and long-term employment opportunities, increased business opportunities, and more efficient governmental services. Consequently, this alternative would not cause significant environmental impacts to minority or low-income individuals and is consistent with the provisions of EO 12898.</p>	<p>No mitigation measures are required.</p>	<p>Less Than Significant.</p>

Environmental Impact	Mitigation Measures	Residual Impact
VISUAL QUALITY		
<p>Alternative 1</p> <p>Under Alternative 1, the Hall of Justice would remain vacant and unsafe for occupancy and would continue to deteriorate physically. Implementation of this alternative, thus, could result in a long-term reduction in the visual quality of the Civic Center area.</p>	No mitigation measures are required.	Less Than Significant.
<p>Alternative 2</p> <p>Construction</p> <p>Overall, the construction period is anticipated to last approximately 30 months. Development of the project would require the demolition/dismantling and removal of the existing asphalt surface parking areas, the digging of subterranean parking garage levels, and the cleaning and rehabilitation of the Hall of Justice building. During this time, equipment such as heavy trucks, and stockpiled cut material may be visible and/or obstruct views of surrounding land uses. This would result in a short-term impact on views from adjacent office uses. The short-term visual effects of grading and construction operations would be unavoidable, since little can be done to improve the aesthetics of a construction area. Short-term visual impacts are considered to be adverse, but less than significant, since the impacts would be temporary. Lighting for construction purposes, if necessary, would be limited to low-level lighting for safety and security purposes.</p>	No mitigation measures are required.	Less Than Significant.

Environmental Impact	Mitigation Measures	Residual Impact
VISUAL QUALITY (continued)		
<p>Alternative 2 (continued)</p> <p>Operational</p> <p>Construction of a new 1,000-space parking structure is proposed as part of Alternative 2. The structure would be located on the northern side of the Hall of Justice site, along Aliso Street, significantly screened from the Temple Street view by the Hall of Justice building, and it would replace the existing surface parking lot. The new parking structure would be visible from the Federal Courthouse and upper floors of the City Hall, as well as to motorists on Spring Street, Aliso Street, and North Broadway. The parking structure is planned to include up to 4.5 levels below grade and up to 4.5 levels above grade. This structure would be designed with an exterior skin that is compatible with the surface texture, color, and architectural features of the Hall of Justice building. The aboveground height of this proposed structure is to match the 4th-floor line of the Hall of Justice building, where a significant architectural bullnose feature occurs on the Hall of Justice exterior. Overall, the development of the parking structure would provide for in-fill development and would be designed to be compatible with the existing Hall of Justice structure.</p> <p>Under this alternative, strategically placed lighting would be provided to highlight architectural elements and building signage. In addition, security and safety lighting will be provided as necessary, and would be limited to building walkway and parking areas. These light sources would be oriented toward the ground and shielded or screened. This would prevent illumination from both spreading into the surrounding areas (which are not considered light sensitive), and interfering with vehicle traffic on surrounding roadways.</p>	<p>No mitigation measures are required.</p>	<p>Less Than Significant.</p>
<p>Alternative 3</p> <p>Implementation of this alternative would result in the same construction and operation-related impacts as described under Alternative 2.</p>	<p>No mitigation measures are required.</p>	<p>Less Than Significant.</p>

Environmental Impact	Mitigation Measures	Residual Impact
AIR QUALITY		
<p>Alternative 1</p> <p>Under this alternative, the Hall of Justice building would remain vacant and would not generate construction or operational air quality emissions.</p>	<p>No mitigation measures are required.</p>	<p>Less Than Significant.</p>
<p>Alternative 2</p> <p>Construction</p> <p>Emissions associated with three criteria pollutants, Carbon Monoxide (CO), Particulate Matter (PM₁₀) and Oxides of Sulfur (SO₂), would all be below the adopted threshold levels throughout the duration of construction activities. However, Reactive Organic Compounds (ROG), and Oxides of Nitrogen (NO_x) emissions would exceed the adopted threshold established by the SCAQMD. As a result, construction air quality impacts would be significant. While this short-term impact is considered significant under CEQA, it is not considered a significant regional impact under NEPA. According to NEPA Law and Litigation Section 8:49, temporary environmental effects, including disruption due to construction activities, are not significant effects.</p>	<p>AQ-1 The project will implement dust control measures consistent with SCAQMD Rule 403 – Fugitive Dust during the construction phases of new project development. The following actions are currently recommended to implement Rule 403 and have been quantified by the SCAQMD as being able to reduce dust generation between 30% and 85%, depending on the source of the dust generation:</p> <ul style="list-style-type: none"> • Apply water and/or approved nontoxic chemical soil stabilizers according to manufacturer’s specification to all inactive construction areas (previously graded areas that have been inactive for 10 or more days). • Replace ground cover in disturbed areas as quickly as possible. • Enclose, cover, water twice daily, or apply approved chemical soil binders to exposed piles with 5% or greater silt content. • Water active grading sites at least twice daily during construction activities. • Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 miles per hour (mph) over a 30-minute period. • All trucks hauling dirt, sand, soil, or other loose materials are to be covered or should maintain at least 2 feet of freeboard (i.e., minimum vertical distance between top of the load and the top of the trailer), in accordance with Section 23114 of the California Vehicle Code. 	<p>Significant and Unavoidable (CEQA); Less Than Significant (NEPA).</p>

Environmental Impact	Mitigation Measures	Residual Impact
NOISE (continued)		
<p>Alternative 2</p> <p>Construction</p> <p>Construction activities associated with this alternative would occur approximately 100 feet from existing commercial uses. Employment of all feasible noise attenuation devices and techniques may be capable of reducing noise levels for stationary equipment to some degree, but trucks and other mobile equipment cannot be surrounded by noise barriers at all locations. Given these factors, periodic noise levels of 95 dB(A) should be anticipated at 50 feet from various types of mobile and stationary construction equipment. Noise levels would diminish with distance from the construction site at a rate of approximately 6 dB(A) per doubling of distance. Thus, as the nearest uses are within 100 feet of the loudest construction equipment, periodic noise levels of up to 90 dB(A) could occur on adjacent off-site properties. Periodic construction noise levels would be noticeable and would constitute a temporary significant noise impact at adjacent off-site commercial uses. While this short-term impact is considered significant under CEQA, it is not considered a significant regional impact under NEPA. According to NEPA Law and Litigation Section 8:49, temporary environmental effects, including disruption due to construction activities, are not significant effects.</p>	<p>N-1 All construction equipment, fixed or mobile, that is utilized on the site for more than two working days shall be in proper operating condition and fitted with standard factory silencing features. To ensure that mobile and stationary equipment is properly maintained and meets all federal, state, and local standards, the applicant shall maintain an equipment log. The log shall document the condition of equipment relative to factory specifications and identify the measures taken to ensure that all construction equipment is in proper tune and fitted with an adequate muffling device. The log shall be submitted to the Department of Public Works for review and approval on a quarterly basis. A County Building Official or a designee shall spot check to ensure compliance.</p> <p>N-2 The applicant shall provide adjacent owners with a construction schedule 10 days in advance of activities. The applicant shall submit a copy of the scheduled and mailing list to the appropriate County regulatory agency prior to the initiation of construction activities. A County Building Official or a designee shall spot check and respond to complaints.</p> <p>N-3 All construction activity, including grading, transport of material or equipment, and warming-up of equipment, shall be limited to between the hours of 7 AM to 7 PM, Monday through Friday, and shall not occur during Saturday and Sunday unless approved by the County. Non-noise-generating exterior construction activities such as interior work shall not be subject to these restrictions. The work schedule shall be posted at the construction site and modified as necessary to reflect any approved deviations.</p>	<p>Significant and Unavoidable (CEQA); Less Than Significant (NEPA).</p>

Environmental Impact	Mitigation Measures	Residual Impact
NOISE (continued)		
<p>Alternative 2 (continued)</p> <p>Operational (continued)</p> <p><i>Mechanical Equipment</i></p> <p>Occasional operational noise would result from landscape, mechanical and disposal services. Such activities currently occur in the surrounding vicinity and the proposed project would not result in any noticeable change with regard to mechanical and stationary noise sources given the heavily urbanized environment of the downtown civic center. Noise levels associated with on-site activities would not result in a significant impact.</p>	No mitigation measures are required.	Less Than Significant.
<p>Alternative 3</p> <p>Construction</p> <p>Under this alternative, construction noise and vibration impacts would be the same as described under Alternative 2. Therefore, short-term construction noise impacts would be significant, while vibration would not be significant. It should be noted that this is a short-term impact that would no longer remain significant once all construction activities have been completed. While this short-term impact is considered significant under CEQA, it is not considered a significant regional impact under NEPA. According to NEPA Law and Litigation Section 8:49, temporary environmental effects, including disruption due to construction activities, are not significant effects.</p>	Same as identified for Alternative 2.	Significant and Unavoidable (CEQA); Less Than Significant (NEPA).

Environmental Impact	Mitigation Measures	Residual Impact
NOISE (continued)		
<p>Alternative 3 (continued)</p> <p>Construction</p> <p><i>Vehicular Noise</i></p> <p>The Hall of Justice currently occupies the project site. In 1994, there was approximately 537,585 gross square feet with 1,343 employees and 527 inmates on 15 floors. After renovation under Alternative 3, the Hall of Justice would be 537,585 gross square feet with 199,132 usable square feet. Under Alternative 3, the Hall of Justice would be occupied with approximately the same amount of full-time employees (1,350) as under the 1994 conditions. Because Alternative 3 would be occupied with the same amount of employees, this alternative would not result in a net increase in daily traffic. More specifically, as no net daily traffic would be generated under this alternative, there would be no net change under the 2005 Plus Project Scenario when compared to the 2005 Without Project Scenario. Therefore, under this alternative, primary effects would be less than significant.</p> <p><i>Parking Structure Noise</i></p> <p>Under this alternative, a new 9-level parking structure with three and half levels of parking above grade would be constructed adjacent to the northeast wall of the Hall of Justice building. Since the parking structure planned under this alternative would be identical in design as described under Alternative 2, noise levels associated with the use of the structure would be identical. Based on the thresholds presented earlier in this section, noise levels associated with the parking structure would not result in a significant impact.</p> <p><i>Mechanical and Stationary Noise</i></p> <p>Under this alternative, operational noise would result from landscape, mechanical and disposal services. As these noise sources would be same as those described under Alternative 2, noise levels would be identical. Based on the thresholds presented earlier in this section, noise levels associated with mechanical and stationary noise sources would not result in a significant impact.</p>	<p>No mitigation measures are required.</p> <p>No mitigation measures are required.</p> <p>No mitigation measures are required.</p>	<p>Less Than Significant.</p> <p>Less Than Significant.</p> <p>Less Than Significant.</p>

Environmental Impact	Mitigation Measures	Residual Impact
PUBLIC SERVICES AND UTILITIES		
<p>Alternative 1</p> <p>Under Alternative 1, the Hall of Justice would remain vacant and unsafe for occupancy and would continue to deteriorate physically. No demand for potable water, energy, or landfill capacity would be associated with this alternative.</p>	No mitigation measures are required.	Less Than Significant.
<p>Alternative 2</p> <p>Water Supply</p> <p>Estimated water demand at full occupancy under this alternative would be approximately 48,750 gallons per day (gpd). Water conservation measures, as required by the State of California, would be incorporated into the renovated structure. Specific measures would include the use of low-flush toilets and urinals consistent with Health and Safety Code Section 17921.3, use of self-closing faucets in public lavatories consistent with Government Code Section 7800, and use of insulation and water-heating systems to reduce water used before hot water reaches equipment or fixtures.</p> <p>The Los Angeles Department of Water and Power (LADWP) maintains sufficient supplies to meet increased demand experienced during periods of low rainfall. On the whole, water supplies of the City of Los Angeles would be sufficient to meet projected water demands over the next 20 years. This would include the projected water demand for Alternative 2. Given the above, rehabilitation and reuse as considered under Alternative 2 would not cause a significant impact on water supplies within the LADWP service area.</p>	No mitigation measures are required.	Less Than Significant.

Environmental Impact	Mitigation Measures	Residual Impact
PUBLIC SERVICES AND UTILITIES (continued)		
<p>Alternative 2 (continued)</p> <p>Solid Waste</p> <p>Operation of office uses associated with Alternative 2 are anticipated to generate a variety of waste types including food (17%), paper (32.5%), plastic (10.5%) and corrugated cardboard (7%) based on data provided by the California Integrated Waste Management Board. Using solid waste generation rates provided by the Board, full occupancy under Alternative 2 is anticipated to generate approximately 593 tons per year (TPY) of waste, assuming no recycling.</p> <p>It is not possible to determine a specific landfill that would receive solid waste generated by users of the renovated structure. This is because private carriers have the option of disposing solid waste at any number of available in-County and out-of-County landfills (e.g., Orange, San Bernardino, Riverside, and Ventura) dependent upon tipping fees, transportation costs, and other economic considerations. Consequently, no single landfill would accept all the solid waste generated over the lifespan of this project.</p> <p>Moreover, all development projects in unincorporated areas are required to cooperate with Countywide programs and to implement site-specific source reduction, recycling and reuse programs. The renovated Hall of Justice property would cooperate with these existing programs through actions such as use of designated recycling separation areas that are conveniently located and prominently marked. With participation in these programs, the estimated 539 TPY of increased solid waste generated by the proposed project would be reduced by up to 50%. Further, the County is obligated to meet the recycling and source reduction requirements of AB 939 and, therefore, must continue the recycling programs in place and expand these programs as needed. Compliance with these requirements would reduce the volume of waste entering landfills. Based on the incorporation of source reduction and recycling into the project design and the disposal options available throughout the Southern California region, solid waste generation and disposal associated with this Alternative would not be considered a significant impact.</p>	<p>No mitigation measures are required.</p>	<p>Less Than Significant.</p>

Environmental Impact	Mitigation Measures	Residual Impact
WATER RESOURCES/FLOOD ENCROACHMENT		
<p>Alternative 1</p> <p>Under this alternative, the Hall of Justice building would remain vacant and would not impact water quality during construction or operational phases.</p>	<p>No mitigation measures are required.</p>	<p>Less Than Significant.</p>

Environmental Impact	Mitigation Measures	Residual Impact
<p>Alternative 2</p> <p>Construction</p> <p><i>Site Preparation</i></p> <p>Construction and grading activities both on site and off site would involve the operation of heavy equipment and cutting of excavations. Projects that disturb between 2 to 5 acres of area during construction are required to prepare a Storm Water Pollution Prevention Plan (SWPPP) in accordance with the County of Los Angeles National Pollutant Discharge Elimination System (NPDES) Municipal Stormwater Permit No. CAS004001. This permit requires that an SWPPP be prepared specifying Best Management Practices (BMPs) to reduce erosion of disturbed soils. In addition, the SWPPP would require that if any spills of materials known to be water pollutants or hazardous materials do occur, the proper agencies would be contacted immediately (if necessary) and appropriate clean up of the spill would take place as soon as possible. Prior to issuance of any grading or building permits, the County must approve the SWPPP. Potential water quality impacts of the proposed project would be less than significant through the preparation and implementation of the SWPPP as specified in the NPDES Permit.</p> <p>Depth to groundwater in the project area is estimated to fluctuate between 20 to 75 feet below the ground surface. Grading activities may require rough grading up to depths of 48 feet for placement of the subterranean portion of the new parking garage. Temporary dewatering systems for the subterranean parking structures would require an NPDES Permit for ground water discharge from the Los Angeles Regional Water Quality Control Board (LARWQCB). This permit would ensure that water discharged to the storm drains would meet all NPDES requirements for suspended solids, organic material, and other water quality parameters thereby reducing water quality impacts associated with this activity to less than significant.</p>	<p>No mitigation measures are required.</p>	<p>Less Than Significant.</p>

Environmental Impact	Mitigation Measures	Residual Impact
WATER RESOURCES/FLOOD ENCROACHMENT (continued)		
<p>Alternative 2 (continued)</p> <p>Construction (continued)</p> <p><i>Exterior Building Cleaning</i></p> <p>The exterior surfaces of the Hall of Justice building would be cleaned with methods complying with recommendations of the Department of the Interior. Pre-washing would be utilized at areas of distinct staining. General cleaning would follow, using a restoration-type cleaner. The cleaning procedures for the exterior building cleaning would involve the placement of barricades around the building to prevent the public from entering areas being cleaned. Plastic sheeting would be fixed to the building and cover the ground with berms established to retain runoff from the cleaning process. All pre-cleaning, cleaning, and rinsing would be captured and effluent pumped into drums on site. Collected effluent in the drums would be neutralized to a pH of between 6 to 8 and run through a 4 to 6 stage filter system, with the final filter being a 5-micron filter. The effluent would then be tested and upon acceptable test results would be released into the City storm drain system. Temporary discharge into the drainage system would require an NPDES Permit from the LARWQCB. This permit would ensure that water discharged to the storm drains would meet all NPDES requirements for suspended solids, organic material, and other water quality parameters thereby reducing water quality impacts associated with this activity to less than significant.</p>	<p>No mitigation measures are required.</p>	<p>Less Than Significant.</p>

Environmental Impact	Mitigation Measures	Residual Impact
WATER RESOURCES/FLOOD ENCROACHMENT (continued)		
<p>Alternative 2 (continued)</p> <p>Operational</p> <p><i>Flooding and Drainage</i></p> <p>EO 11988 prohibits federal agencies from funding construction within a 100-year flood plain unless there are no practical alternatives. This project is not located within the 100-year flood plain as indicated on the Flood Insurance Rate Map (FIRM), Community Panel No. 060137-0074C for the City of Los Angeles. As such, potential flood plain encroachment issues are considered to be less than significant.</p> <p>Once the project is completed, approximately 85% of the Hall of Justice site would be covered with impervious surface, which is approximately a 10% reduction over existing conditions. All runoff would continue to be conveyed via street and gutters to storm inlet locations around the Hall of Justice site. Due to the reduction in impervious surface under this alternative over existing conditions, the amount of storm runoff conveyed from the site would be less than existing conditions. Consequently, potential drainage impacts are considered to be less than significant.</p>	<p>No mitigation measures are required.</p>	<p>Less Than Significant.</p>

Environmental Impact	Mitigation Measures	Residual Impact
WATER RESOURCES/FLOOD ENCROACHMENT (continued)		
<p>Alternative 2 (continued)</p> <p><i>Water Quality</i></p> <p>Common concerns related to surface water quality include the potential deposition of pollutants generated by motor vehicles and the maintenance and operation of landscape areas. Urban runoff contains almost every type of water pollutant, including suspended solids, bacteria, heavy metals, oxygen-demanding substances, nutrients, and oil and grease. Primary sources of urban runoff pollutants include animal droppings, atmospheric fallout, land erosion, lawn runoff (pesticides, herbicides, fertilizers), and pavement runoff. The quality of runoff from the project site would be subject to Section 402(p) of the Clean Water Act under the NPDES program. Development projects have responsibilities under the NPDES Municipal Permits No. CAS004001 to ensure pollutant loads from the projects do not exceed total maximum daily loads for downstream receiving waters. Development projects are required to submit and then implement a Standard Urban Storm Water Mitigation Plan (SUSMP) containing design features and BMPs appropriate and applicable to the project. The purpose of the SUSMP is to reduce post-construction pollutants in storm water discharges. Prior to issuance of any grading or building permits, the County must approve the SUSMP. Potential water quality impacts of the proposed project would be less than significant through the preparation and implementation of the SUSMP as specified in the NPDES Permit.</p>	<p>No mitigation measures are required.</p>	<p>Less Than Significant.</p>

Environmental Impact	Mitigation Measures	Residual Impact
BIOLOGICAL RESOURCES (continued)		
<p>Alternative 2</p> <p>Construction of this alternative would include the removal of on-site ornamental vegetation and the potential replacement with, or addition of, new on-site vegetation for ornamental or passive energy conservation purposes. Along Temple Street, the ficus trees and Japanese zelkova tree would be removed and new street trees would be provided. Along North Broadway, the 7 magnolia trees would be retained, and the 4 olive trees would be removed and replaced with new magnolias. The 3 Japanese maple trees along Aliso Street would be relocated to Spring Street, and Aliso Street would receive new landscaping. The 11 Japanese maple trees along Spring Street would include retaining 8 of the trees and the removal of 3 trees near the new main entrance to the building. Landscaping in the area of the new main building entrance and pedestrian plaza on Spring Street would include various plant species including trees, hedges, lawns, and ground cover plant material. The loss of this non-native habitat is considered to be a less than significant biological resources impact.</p> <p>In addition to the loss of ornamental vegetation and trees, construction activities in the project area, including noise, barriers, and dust, would cause temporary disturbance to locally and regionally abundant wildlife species. Grading and soil compaction could result in the direct mortality of slow-moving and/or ground-dwelling animals. Because these animals are abundant and would likely reestablish in temporarily disturbed areas following construction, the level of construction-related mortality is considered less than significant.</p> <p>However, a number of bird species could be adversely affected as a result of construction or other site preparation activities. Such activities could result in the direct loss of active nests or the abandonment and subsequent loss of active nests by adult birds. Bird nests with eggs or young are protected under the Federal Migratory Bird Treaty Act and the California Fish and Game Code. Depending on the number and extent of bird nests on the site that may be disturbed or removed, the loss of active bird nests would be a potentially significant impact.</p>	<p>BIO-1 Within 15 days prior to exterior construction or site preparation activities that would occur during the nesting/breeding season of bird species potentially nesting on the site (typically March 1 through August 15), the applicant shall retain the services of a qualified biologist. The biologist shall conduct on-site surveys to determine if active bird nests, protected by the Migratory Bird Treaty Act and/or the California Fish and Game Code, are present within the construction zone. If active nests are found on or immediately adjacent to the site, a minimum buffer, as determined by the retained biologist, shall be temporarily fenced around the nest site. No construction activities shall be permitted within this nest zone until the young birds have fledged, as determined by the biologist.</p>	<p>Less Than Significant.</p>

Environmental Impact	Mitigation Measures	Residual Impact
BIOLOGICAL RESOURCES (continued)		
<p>Alternative 2 (continued)</p> <p>No Endangered, Threatened, or otherwise sensitive biological resources (i.e., wetlands, vegetation, or wildlife) were found on the site nor are any anticipated given present on-site conditions. Consequently, impacts to these resources are considered to be less than significant.</p>		
<p>Alternative 3</p> <p>The removal and replacement of vegetation and ornamental trees would be the same under this alternative as Alternative 2, and would thus result in less than significant impacts. Wildlife disruption under this alternative, like Alternative 2, would be less than significant given that on-site animals are abundant and would likely reestablish in temporarily disturbed areas following construction. Since this alternative includes the removal of trees, potential impacts to active nest could occur resulting in potentially significant impacts.</p>	Same as identified for Alternative 2.	Less Than Significant.
CULTURAL RESOURCES		
<p>Alternative 1</p> <p>Paleontological Resources</p> <p>Under the No Project Alternative, the project site would remain in its present state. No impacts to paleontological resources would occur with the implementation of this alternative.</p> <p>Archaeological Resources</p> <p>Under the No Project Alternative, the project site would remain in its present state. No impacts to archaeological resources would occur with the implementation of this alternative.</p> <p>Historic Architecture</p> <p>Under the No Project Alternative, the project site would remain in its present state. No impacts to historic architecture would occur with the implementation of this alternative.</p>	<p>No mitigation measures are required.</p> <p>No mitigation measures are required.</p> <p>No mitigation measures are required.</p>	<p>Less Than Significant.</p> <p>Less Than Significant.</p> <p>Less Than Significant.</p>

Environmental Impact	Mitigation Measures	Residual Impact
CULTURAL RESOURCES (continued)		
<p>Alternative 2</p> <p>Paleontological Resources</p> <p>Grading for the construction of the new parking structure would include the removal of earth materials down to the level of the basement excavation, up to depths of 48 feet below the existing ground surface. Because there is a possibility that paleontological resources may be present within the boundaries of the project site, these activities may impact undocumented paleontological resources. Destruction of presently unknown paleontological resources would be considered a significant impact.</p>	<p>PR-1 A qualified paleontologist shall be retained to monitor construction excavations in those portions of the project site that are underlain by geologic units with paleontological sensitivity. Monitoring shall include inspection of exposed rock units and microscopic examination of matrix to determine if fossils are present. If a representative initial sample of the site reveals no significant fossil remains to the satisfaction of the paleontological monitor, then such monitoring may be terminated.</p> <p>PR-2 If fossils are present, the monitor shall collect matrix for processing. In order to expedite removal of fossil matrix, the monitor may request heavy machinery assistance to move large quantities of matrix out of the path of construction to designated stockpile areas. Testing of stockpiles shall consist of screen washing small samples (200 pounds) to determine if significant fossils are present. Productive tests will result in screen washing of additional matrix from the stockpiles to a maximum of 6,000 pounds per locality to ensure recovery of a scientifically significant sample. Fossils recovered shall be prepared, identified by qualified experts, and listed in a database to allow analysis. At each fossil locality, field data forms shall be used to record the locality. Stratigraphic columns shall be measured and appropriate scientific samples submitted for analysis.</p>	<p>Less Than Significant.</p>

Environmental Impact	Mitigation Measures	Residual Impact
CULTURAL RESOURCES (continued)		
<p>Alternative 2 (continued)</p> <p>Archeological Resources</p> <p>An intensive Phase I archaeological survey/Class III inventory was conducted for the Hall of Justice study area. This involved background studies reviewing the prehistory and ethnography of the study area; an archival records search to determine whether any prehistoric or historical archaeological sites had been recorded or were known to exist on this property; a review of auger boring logs; and an intensive on-foot survey of the study area.</p> <p>The Phase I archaeological survey/Class III inventory of the study area failed to find evidence in the field for the existence of extant archaeological resources of any kind. The background review of the prehistory and ethnography of this region, moreover, revealed the fact that no known archaeological sites have been recorded within or in the immediate vicinity of the study area. The auger borings demonstrated the presence of a layer of construction fill overlying bedrock. While the presence of this construction fill effectively precludes the existence of intact prehistoric archaeological resources within the study area, it also raises the possibility that historical archaeological resources may be present. Based on these findings, construction of the new parking structure and repair of the building does not appear to have the potential to result in adverse impacts to known prehistoric archaeological resources. However, the existing construction fill below the project site has the potential to contain historical archaeological resources, which might be adversely affected due to construction and earthmoving activities. Consequently, potential impacts are considered to be significant.</p>	<p>AR-1 All subsurface grading on the site shall be monitored by an archaeologist to ensure that no intact archaeological resources are impacted. In the event that archaeological resources are unearthed during project subsurface activities, all earth-disturbing work within a radius to be determined by the monitoring archaeologist must be temporarily suspended or redirected until the monitoring archaeologist has evaluated the nature and significance of the find. After the find has been appropriately mitigated, work in the area may resume.</p> <p>AR-2 If human remains are unearthed, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC will then contact the most likely descendant of the deceased Native American, who may then serve as a consultant on how to proceed with the remains (i.e., avoid, rebury).</p>	<p>Less Than Significant.</p>

Environmental Impact	Mitigation Measures	Residual Impact
CULTURAL RESOURCES (continued)		
<p>Alternative 2 (continued)</p> <p>Historic Architecture</p> <p><i>California Environmental Quality Act</i></p> <p>The Hall of Justice has been determined eligible for listing in the National Register of Historic Places (NRHP). The proposed project rehabilitates and repairs some of the character-defining features of the Hall of Justice, but demolishes or alters others. Section 21084.1 of the California Public Resources Code states that “A project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment.” Consequently, the project would result in significant impacts to historical materials that are identified as character-defining features of the building.</p>	<p>Treatment prior to Implementation of the Undertaking</p> <p>HA-1 Prior to the start of construction, the County will conduct a Level 2 Historic American Building Survey and Historic Architecture and Engineering Recordation (HABS/HAER) of the Hall of Justice building, and all spaces therein, in accordance with the Secretary of the Interior’s Guidelines for Architectural and Engineering Documentation.</p> <p>HA-2 The County will provide final archival HABS/HAER documentation to the Los Angeles Public Library, Central Branch.</p> <p>HA-3 The County will, prior to the start of any construction and following the execution of this agreement, provide FEMA and State Historic Preservation Office (SHPO) with, and adhere to, a preservation plan that details, both photographically and in narrative form, the phasing, removal, protection, shoring, provenance, storage, and reinstallation of all finishes, walls, doors, floors, ceilings, and fixtures extant in the 1st- and 2nd-floor Lobby/Loggia, elevator cabs 1–7, the 8th-floor library (Room 819), one 8th-floor courtroom (Room 816), the two stairwells to be retained and refurbished (Attachment 2), the jail cells, and the light courts.</p>	<p>Significant and Unavoidable.</p>

Environmental Impact	Mitigation Measures	Residual Impact
CULTURAL RESOURCES (continued)		
<p>Alternative 2 (continued)</p> <p>Historic Architecture (continued)</p> <p><i>California Environmental Quality Act (continued)</i></p>	<p>Exterior Treatment</p> <p>HA-4 The County will clean and restore the building exterior in accordance with the Secretary of the Interior’s Standards for Restoration and Guidelines for Restoring Historic Buildings.</p> <p>HA-5 The County shall give first priority to stabilizing the architectural glazed terra cotta veneer from the office side of the exterior walls in lieu of anchoring through the architectural glazed terra cotta veneer. If the County is unable to stabilize the architectural glazed terra cotta veneer from the office side of the exterior walls, then the County will submit a proposed alternative stabilization method to FEMA and SHPO for review in accordance with stipulations III.B-E of the Memorandum of Agreement (MOA). Refer to Appendix A of the Final EA/EIR for a copy of the MOA.</p> <p>HA-6 The County will retain and rehabilitate all original historic windows.</p> <p>HA-7 The County will remove all window-mounted air-conditioning units.</p> <p>Interior Treatment</p> <p>HA-8 The County will rehabilitate the 1st- and 2nd-floor grand lobby/loggia (Attachment 1) in accordance with the Secretary of the Interior’s Standards for the Rehabilitation and Guidelines for Rehabilitating Historic Properties and</p> <ul style="list-style-type: none"> • Remove existing secondary infill in the 2nd-floor lobby/loggia. • Retain and refurbish elevator cabs 1–7. <p>HA-9 The County will rehabilitate the 8th-floor library (Room 819) in accordance with Secretary of the Interior’s Standards for Rehabilitation and Guidelines for Rehabilitating Historic Properties.</p>	

Environmental Impact	Mitigation Measures	Residual Impact
CULTURAL RESOURCES (continued)		
<p>Alternative 2 (continued)</p> <p>Historic Architecture (continued)</p> <p><i>California Environmental Quality Act (continued)</i></p>	<p>Interior Treatment (continued)</p> <p>HA-10 The County will retain the historic features of the 8th-floor courtroom 816 in accordance with Secretary of the Interior’s Standards for Rehabilitation and Guidelines for Rehabilitating Historic Properties.</p> <p>HA-11 The County will relocate a representative grouping of jail cells into the basement or ground floor of the Hall of Justice.</p> <p>HA-12 The County will develop an interpretive program involving the relocated jail cells and allow periodic public access to the relocated jail cells.</p> <p>HA-13 The County will retain and refurbish the two stairwells identified in Attachment 2 in accordance with Secretary of the Interior’s Standards for Rehabilitation and Guidelines for Rehabilitating Historic Properties.</p> <p>HA-14 The County will retain and refurbish the glazed tiles in the light courts.</p> <p>HA-15 The County shall give first priority to raising the existing non-original dropped ceilings on floors 3 through 9 clear of window openings. If the County is unable to raise the existing non-original dropped ceilings on floors 3 through 9 clear of window then the County will submit a proposed alternative stabilization method to FEMA and SHPO for review in accordance with stipulations III.B-E of the MOA. Refer to Appendix A of the Final EA/EIR for a copy of the MOA.</p>	

Environmental Impact	Mitigation Measures	Residual Impact
CULTURAL RESOURCES (continued)		
<p>Alternative 2 (continued)</p> <p>Historic Architecture (continued)</p> <p><i>National Historic Preservation Act/National Environmental Policy Act</i></p> <p>Under the Advisory Council’s regulations a determination of either <i>adverse effect</i> or <i>no adverse effect</i> must be made for National Register eligible cultural resources. An <i>adverse effect</i> occurs whenever an impact alters, directly or indirectly, any characteristic of a cultural resource that qualifies it for inclusion in the National Register, e.g., diminishing the integrity of the resource’s location, design, setting, materials, workmanship, feeling, or association. Adverse effects also include reasonably foreseeable effects caused by the preferred alternative that would occur later in time, be farther removed in distance or be cumulative (36 CFR Part 800.5, <i>Assessment of Adverse Effects</i>).</p> <p>The word adverse is used differently in federal and state terminology. The federal adverse effect defines a class of actions despite mitigation. CEQA guidance, on the other hand, specifies that a project that adversely affects a historic resource has a significant effect on the environment. The proposed work would alter or remove a number of the historic features of the building. Under the NHPA, implementation of this alternative would have an adverse effect on historic resources.</p> <p>Once an adverse effect has been identified, the Section 106 process calls for the recommendation and implementation of mitigation strategies to lessen the adversity of the effect. Consultation with the SHPO and other involved agencies has been conducted by FEMA, which has lead to the drafting of an MOA among the involved parties. FEMA has applied the criteria of adverse effect and has required appropriate mitigation to avoid, reduce and minimize the adverse effect.</p>	<p>Same mitigation measures as identified above. Per NEPA guidance, impacts would be reduced to a less than significant level. Any resultant reduction in impact due to mitigation is an estimate of the effectiveness of mitigation under NEPA only. It does not suggest that the level of effect as defined by Section 106 is similarly reduced. Although adverse effects under Section 106 may be mitigated, the effect remains adverse.</p>	<p>Less Than Significant.</p>

Environmental Impact	Mitigation Measures	Residual Impact
CULTURAL RESOURCES (continued)		
<p>Alternative 2 (continued)</p> <p>Historic Architecture (continued)</p> <p><i>National Historic Preservation Act/National Environmental Policy Act (continued)</i></p> <p>Overall, the implementation of this alternative would alter character-defining feature(s) of the building but would not diminish the integrity or so impair the resource to the extent that its National Register eligibility is jeopardized. The exterior of the building would retain sufficient visual integrity to allow the resource to convey its original architectural design. The proposed exterior alterations would be limited to the removal of exterior fire escapes and the replacement of opaque glass on several of the upper floors. While these alterations materially affect the exterior of the building, its integrity would not appear be so diminished that the Hall of Justice would not be eligible for listing on the National Register of Historic Places. In addition, mitigation measures have been proposed to minimize impacts to a less than significant level.</p>		Less Than Significant.
<p>Alternative 3</p> <p>Paleontological Resources</p> <p>Implementation of this alternative would result in the same impacts described under Alternative 2. Impacts associated with the destruction of undocumented paleontological resources would be significant.</p> <p>Archaeological Resources</p> <p>Implementation of this alternative would result in the same impacts described under Alternative 2. Impacts associated with the destruction of undocumented archaeological resources would be significant.</p>	<p>Same as identified for Alternative 2.</p> <p>Same as identified for Alternative 2.</p>	<p>Less Than Significant.</p> <p>Less Than Significant.</p>

Environmental Impact	Mitigation Measures	Residual Impact
CULTURAL RESOURCES (continued)		
<p>Alternative 3 (continued)</p> <p>Historic Architecture</p> <p>Implementation of this alternative would result in the adaptive reuse of the existing building to the Secretary of Interior Standards. All rehabilitation would occur per the Secretary of Interior Standards, and no character defining features would be altered. Consequently, impacts under this alternative would be less than significant per CEQA guidance and result in no adverse effect per NEPA/NHPA guidance.</p>	<p>No mitigation measures are required.</p>	<p>Less Than Significant.</p>

2.3 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

According to the *CEQA Guidelines*, the EIR need only examine in detail those alternatives that could feasibly meet most of the basic objectives of the project. When addressing feasibility, the *CEQA Guidelines* Section 15126.6 states that "...among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency...jurisdictional boundaries, and whether the applicant can reasonably acquire, control or otherwise have access to alternative sites." The *CEQA Guidelines* also specify that the alternatives discussion should not be remote or speculative, and need not be presented in the same level of detail as the assessment of the proposed project.

Therefore, based on the *CEQA Guidelines*, several factors need to be considered in determining the range of alternatives to be analyzed in an EIR and the level of analytical detail that should be provided for each alternative. These factors include (1) the nature of the significant impacts of the proposed project; (2) ability of alternatives to avoid or lessen the significant impacts associated with the project; (3) the ability of the alternatives to meet the objectives of the project; and (4) the feasibility of the alternatives. These factors would be unique for each project.

Based on the foregoing summary, Alternative 1 (No Project) is considered the environmentally superior alternative. Section 15326(d)(2) of the *CEQA Guidelines* indicates that, if the No Project Alternative is the "environmentally superior" alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives. In this instance, Alternative 3 is considered environmentally superior due to reducing the significant and unavoidable historic architecture impacts. While this alternative would reduce this impact, it would not allow for the County to maximize the use of the building through the provision of 325,000 square feet of useable space and would render five floors of the building unusable.