

## 5.0 FINDINGS REGARDING ALTERNATIVES

---

Alternatives to the project described in the Final Environmental Assessment/Environmental Impact Report (Final EA/EIR) were considered. As a result of the project formulation process, the County of Los Angeles explored numerous alternatives to assess their ability to fulfill most of the basic objectives of the proposed project. The County of Los Angeles identified five alternatives to the Proposed Alternative (project). These included an Alternate Site Alternative, Demolition and Replacement Alternative, Lease Alternative, No Project Alternative, and Adaptive Reuse to the Secretary of Interior Standards Alternatives. Three of these alternatives were not selected for further consideration, and two were carried for detailed evaluations as described below.

### 5.1 ALTERNATIVES CONSIDERED AND NOT SELECTED FOR FURTHER STUDY

#### **Alternate Site**

Under this alternative, the County of Los Angeles would develop the project on an alternative site, within the downtown Civic Center area, and relocate some or all of the existing and planned facilities to another site. This alternative was eliminated from consideration for a number of reasons. First, the County-owned Hall of Justice, located within the downtown Civic Center area, would remain vacant and unsafe for occupancy. Equally as important, the continued deterioration of the building would require the County to expend funds to maintain the building. Second, there is not a large enough block of contiguous available office space in the Los Angeles Civic Center that would fulfill the needs of the County, notwithstanding the cost implications. Lastly, the primary purpose of the project is to repair the Hall of Justice for use by seismically retrofitting the earthquake-damaged building and refurbishing the building interior for modern office use, while preserving and restoring selected historic features. For the above reasons, the implementation of this alternative would neither meet the intent of the project nor meet many of the objectives of the project.

#### **Demolition and Replacement**

Under this alternative, the existing Hall of Justice building would be demolished and a new building constructed to meet the requirements of the County of the Los Angeles, including provision of 325,000 square feet useable modern "Class A" office space and a 1,000-car parking garage. The primary purpose of the project is to repair the Hall of Justice for use by seismically retrofitting the earthquake-damaged building and refurbishing the building interior for modern office use, while preserving and restoring the primary historic features. Consequently, the demolition of this building, which is eligible for the

National Register of Historic Places (NRHP), would neither meet the intent of the project nor meet many of the objectives of the project.

### **Lease Alternative**

This alternative would include leasing a building with 325,000 square feet of useable “Class A” modern office space by the County of Los Angeles within the Civic Center area. This alternative was eliminated from consideration for several reasons. First, the County-owned Hall of Justice, located within the downtown Civic Center area, would remain vacant and unsafe for occupancy. Equally as important, the continued deterioration of the building would require the County to expend funds to maintain the building. Second, there is not a large-enough block of contiguous available office space in the Los Angeles Civic Center that would fulfill the needs of the County. Lastly, the primary purpose of the project is to repair the Hall of Justice for use by seismically retrofitting the earthquake-damaged building and refurbishing the building interior for modern office use, while preserving and restoring selected historic features. For the above reasons, the implementation of this alternative would neither meet the intent of the project nor meet many of the objectives of the project.

## **5.2 ALTERNATIVES CONSIDERED AND EVALUATED IN THE EA/EIR**

The County of Los Angeles identified two alternatives to carry forward for detailed evaluation in the EA/EIR. As required by the California Environmental Quality Act (CEQA), a No Project Alternative was considered that entailed the effects of continuing to operate without the project. In addition, the Adaptive Reuse of the Existing Building to Secretary of Interior Standards Alternative was considered, which entailed keeping the improvements to conform to the *Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing History Buildings*.<sup>1</sup>

The ability of the project and two alternatives under consideration to meet the objectives of the project is summarized in **Table 5.0-1, Summary of Project and Alternatives’ Ability to Attain Basic Project Objectives**. None of the alternatives were determined to be consistent with all eight of the project objectives. In addition, **Table 5.0-2, Comparative Analysis of Impacts for Project and Alternatives**, provides a comparison of the impacts of project in comparison to the alternatives.

---

<sup>1</sup> Weeks, Kay D. and Anne E. Grimmer, 1995. *The Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings*. U.S. Department of the Interior, Cultural Resource Stewardship and Partnerships. Washington D.C.

**Table 5.0-1  
Summary of Project and Alternatives' Ability to Attain Project Objectives**

| Objective  | Alternatives                   |            |                            |
|--|--------------------------------|------------|----------------------------|
|  | Proposed Alternative (Project) | No Project | Adaptive Reuse Alternative |
| Renovate the Hall of Justice into a modern "Class A" (that is typical of better-quality office buildings within the region) government office building, allowing for use by the County Sheriff's Department, District Attorney, Department of Parks and Recreation, and other County agencies. | Yes                            | No         | No                         |
| Provide for 325,000 square feet of useable "Class A" modern office space at a cost comparable to other available commercial office alternatives.   | Yes                            | No         | No                         |
| Seismically retrofit the earthquake-damaged building, and restore the core and shell elements of the building to alleviate a public safety hazard, while retaining the primary historic features to the extent that preservation efforts are economically feasible.                            | Yes                            | No         | Yes                        |
| Provide a facility that is Americans with Disabilities Act (ADA) accessible throughout the building.   | Yes                            | No         | No                         |
| Fulfill the vision of the Civic Center Shared Facilities and Enhancement Plan, which includes the rehabilitation of the Hall of Justice for government office use.   | Yes                            | No         | Yes                        |
| Allow for the repair and enhancement of a building, which is acknowledged to feature exceptional architecture to create a landmark development that reflects and promotes the Los Angeles Civic Center.  | Yes                            | No         | Yes                        |
| Provide for pedestrian circulation around the site that would allow linkage of the Hall of Justice to other government and private uses within the Los Angeles Civic Center area.  | Yes                            | No         | Yes                        |
| Remove and/or remediate potentially hazardous building materials contained within the Hall of Justice, such as lead-based paint and asbestos-containing materials.   | Yes                            | No         | No                         |

**Table 5.0-2  
Comparative Analysis of Impacts for Project and Feasible Alternatives**

| <b>Resource</b>                                     | <b>Proposed Alternative (Project)</b>  | <b>No Project</b>   | <b>Adaptive Reuse Alternative</b>                           |
|---|--|---|---|
| <b>Geology and Soils</b>                            | Impacts due to earthquake activity and expansive soils would be mitigated to less than significant.  | The No Project Alternative would not result in earthquake or expansive soil impacts.<br><br>Comparative Impact: Less.   | Similar as the project.<br><br>Comparative Impact: Similar. |
| <b>Traffic and Circulation</b>                      | Construction traffic may result in temporary impacts but can be mitigated to less than significant. Impacts to surrounding intersections in the long-term under operational conditions would be less than significant.   | The No Project Alternative would not result in construction or long-term traffic impacts.<br><br>Comparative Impact: Less.  | Similar as the project.<br><br>Comparative Impact: Similar. |
| <b>Public Health and Safety/Hazardous Materials</b> | 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 mitigated to less than significant. | The No Project Alternative would result in the Hall of Justice remaining 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.<br><br>Comparative Impact: Greater. | Similar as the project.<br><br>Comparative Impact: Similar. |
| <b>Visual Quality</b>                               | Impact to short-term visual resources would be adverse but less than significant. In addition, long-term visual impact due to the introduction of a parking garage and lighting would be less than significant.  | The No Project Alternative would result in the Hall of Justice remaining 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.<br><br>Comparative Impact: Greater.                    | Similar as the project.<br><br>Comparative Impact: Similar. |

| Resource                             | Proposed Alternative (Project)  | No Project   | Adaptive Reuse Alternative  |
|--------------------------------------|---|--|---|
| <b>Air Quality</b>                   | <p>Emissions associated with three criteria pollutants: carbon monoxide (CO), particulate matter (PM<sub>10</sub>) and oxides of sulfur (SO<sub>2</sub>), would all be below the adopted threshold levels throughout the duration of construction activities. However, reactive organic gases (ROG) and oxides of nitrogen (NO<sub>x</sub>) emissions would exceed the adopted threshold established by the South Coast Air Quality Management District (SCAQMD) and can not be mitigated to less than significant.</p> <p>None of the five criteria pollutants (ROG, CO, PM<sub>10</sub>, SO<sub>2</sub>, and NO<sub>x</sub>) would exceed the adopted SCAQMD operational thresholds under this alternative. Therefore, under the project, operation emissions would be less than significant.</p> | <p>The No Project Alternative would not result in construction or operational air-quality emissions.</p> <p>Comparative Impact: Less.</p>        | <p>Construction emissions associated with this alternative would be the same as described under Alternative 2 on a daily basis but would be less on an overall basis. This is due to the shorter construction schedule associated with this alternative. Nonetheless, the amount of construction emissions associated with this alternative would remain significant with respect to ROG and NO<sub>x</sub> emissions.</p> <p>Because this alternative would be occupied with the same amount of employees, this alternative would not result in a net increase in daily traffic. As this alternative would not result in a net increase in vehicle trips, air-quality emissions associated with this alternative would be negligible.</p> <p>Comparative Impact:<br/>Construction – Similar; and<br/>Operational – Less.</p> |
| <b>Noise</b>                         | <p>Construction noise under the project would exceed threshold levels and cannot be mitigated to a less than significant level. Operational noise associated with vehicles, the parking structure, and mechanical equipment.</p>  | <p>The No Project Alternative would not result in construction or operational noise impacts.</p> <p>Comparative Impact: Less.</p>                | <p>Similar as the project.</p> <p>Comparative Impact: Similar.</p>  |
| <b>Public Services and Utilities</b> | <p>Impacts associated with water supply, sewer service, energy, and solid waste would be less than significant.</p>   | <p>The No Project Alternative would not result in demand for water, sewer, energy, or solid waste services.</p> <p>Comparative Impact: Less.</p> | <p>Similar as the project.</p> <p>Comparative Impact: Similar.</p>  |

| Resource                                  | Proposed Alternative (Project)   | No Project   | Adaptive Reuse Alternative  |
|---|--|--|---|
| <b>Water Resources/Flood Encroachment</b> | Construction and operational water quality issues would be less than significant with the adherence to National Pollutant Discharge Elimination System (NPDES) requirements and implementation of Best Management Practices. Runoff from the project site would be less than currently exists due to a reduction in impervious surfaces, and, as such, runoff and associated flooding issues would be reduced.   | The No Project Alternative would not result in construction or operational water quality issues. In addition, the No Project Alternative would not result in any flooding issues.<br><br>Comparative Impact: Less. | Similar as the project.<br><br>Comparative Impact: Similar.   |
| <b>Biological Resources</b>               | The project includes the removal of several trees, which could adversely affect nesting bird species. Mitigation is included to reduce this impact to less than significant.   | The No Project Alternative would not result in biological resource impacts.<br><br>Comparative Impact: Less.   | Similar as the project.<br><br>Comparative Impact: Similar.   |
| <b>Cultural Resources</b>                 | Paleontological and Archaeological resource impacts would be mitigated to less than significant.<br><br>The Proposed Project Alternative 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, "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. Incorporation of <b>Mitigation Measures HA-1 through HA-15</b> would reduce impacts related to the historical value of the Proposed Project Alternative. However, the impacts are still considered significant. | The No Project Alternative would not result in paleontological, archaeological, or historic architecture impacts.<br><br>Comparative Impact: Less.   | Paleontological and Archaeological Resource impacts would be similar to the project.<br><br>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.<br><br>Comparative Impact:<br>Paleontological and Archaeological – Similar; and<br>Historic Architecture – Less. |

## No Project Alternative

**Description of Alternative:** According to Section 15126.6(e) of CEQA, a No Action/No Project Alternative must be evaluated. The purpose of the No Project Alternative is to consider the effect of maintaining existing conditions. The No Project Alternative addresses what would reasonably be expected to occur in the foreseeable future if neither the Proposed Project Alternative nor Adaptive Reuse Alternative is approved and implemented.

The Hall of Justice building remained in use until January 1994 when the Northridge earthquake caused extensive damage to the building. The building was deemed to be unsafe and has been vacant since the earthquake. Under the No Project Alternative, 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 poses no imminent threat or safety hazard to the surrounding environs. Such threats and hazards include, but are not limited to, structural collapse and fire, as well as the uncontrolled release of potentially hazardous materials located within the building. Additionally, there would be a potential for persons to enter the building seeking shelter or to vandalize the building. To avoid these conditions, a security plan would also be required. Therefore, the No Project Alternative would result in continuing costs to the County of Los Angeles to maintain and secure the building, as well as increasing risk to the County. Such risk would represent additional cost to the County whether it was insured against or not.

The No Project Alternative would also hamper the County's ability to address growing needs for additional office space. This alternative would require the Sheriff's Department, District Attorney, Department of Parks and Recreation, and other County agencies to remain in their existing locations, or at least remain until such time that other suitable office space becomes available or is constructed by the County. Lastly, the implementation of this alternative would not allow for the County to maximize the existing resource (i.e., the building) for reuse as an office building.

**Effectiveness in Meeting Project Objectives:** This alternative does not meet any of the eight project objectives discussed in Section 3.6 of the Draft EA/EIR. The summary of this alternative's ability to meet the objectives is described in **Table 5.0-1**.

**Comparison of Effects of the Alternative to Effects of the Project:** A summary comparison of this alternative to effects of the project is presented in **Table 5.0-2**. The analysis presented in the table shows that this alternative differs from the project in the assessment of geology and soils, traffic/circulation and parking, public health and safety/hazardous materials, air quality, noise, biological resources, and cultural resources.

- Geology and Soils – As documented in **Table 5.0-2**, the No Project Alternative would not have an effect on the geology and soils.
- Traffic/Circulation and Parking – As documented in **Table 5.0-2**, the No Project Alternative would not alter the vacant building and would not generate construction or operational traffic.
- Public Health and Safety/Hazardous Materials – As documented in **Table 5.0-2**, the No Project Alternative would not alter the vacant building. The building will continue to be 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.
- Visual Quality – As documented in **Table 5.0-2**, the No Project Alternative would result in the Hall of Justice remaining vacant and unsafe for occupancy and would continue to deteriorate physically. Implementation of this alternative, therefore, could result in a long-term reduction in the visual quality of the Civic Center area.
- Air Quality – As documented in **Table 5.0-2**, the No Project Alternative would not alter the vacant building and would not generate construction or operational air-quality emissions.
- Noise – As documented in **Table 5.0-2**, the No Project Alternative would not alter the vacant building and would not result in any construction or operational noise.
- Biological Resources – As documented in **Table 5.0-2**, the No Project Alternative would not alter the building, and no impacts to biological resources would occur.
- Cultural Resources – As documented in **Table 5.0-2**, the No Project Alternative would not alter the building, and no impacts to paleontological resources, archaeological resources, or historic architecture would occur.

**Feasibility:** This alternative would not feasibly achieve project objectives. Consequently, the County of Los Angeles County rejects the No Project Alternative because this alternative fails to meet the project objectives.

**Facts:** The above feasibility finding is based on the following:

- None of the eight objectives are met in the No Project Alternative.

### **Adaptive Reuse of the Existing Building to Secretary of Interior Standards**

**Description of Alternative:** Adaptive Reuse would include repair of the Hall of Justice, per the *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings*. In other words, all character-defining historic features and elements of the building would remain entirely intact under this alternative. Adaptive Reuse 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, Adaptive Reuse would include the cleaning, refurbishing, and repair of the historic exterior wall materials.

**Effectiveness in Meeting Project Objectives:** This alternative meets four of the eight objectives discussed in Section 3.6 of the Draft EA/EIR. The Adaptive Reuse of the Existing Building to Secretary of Interior Standards Alternative fails to meet three of the basic objectives of the project.

**Comparison of Effects of the Alternative to Effects of the Project:** The regulatory framework and existing conditions would be the same as that described for the Project. A summary comparison of this alternative to effects of the project is presented in **Table 5.0-2**. This alternative differs from the project in the assessment of cultural resources.

- Cultural Resources – As documented in **Table 5.0-2**, historical features of the building would be altered or removed under the proposed project but would remain and be restored under this alternative. All existing jail floors and cells would remain, all hollow clay tiles forming interior partition walls and exterior wall furring would remain in place, and all exiting courtrooms, offices, chambers, and other spaces would remain configured as they currently exist.

**Feasibility:** This alternative cannot feasibly achieve many of the project objectives. Consequently, the County of Los Angeles County rejects the Adaptive Reuse Alternative because this alternative fails to meet the project objectives.

**Facts:** The above feasibility finding is based on the following:

- The alternative is not capable of meeting four of the eight basic objectives of the project.
- The Adaptive Reuse of the Existing Building to Secretary of Interior Standards Alternative would provide more gross square footage than the proposed project but would reduce the amount of “Class A” office space available for use by approximately 125,868 square feet. This is incompatible with the project’s objectives.
- The inability to improve the elevator system would fail to provide a facility that is American with Disabilities Act (ADA) accessible throughout the building.
- The inability to remodel certain portions of the interior and exterior would prevent the removal and/or remediation of potentially hazardous building materials contained within the Hall of Justice, such as lead-based paint and asbestos-containing materials.
- While the Adaptive Reuse Alternative is considered environmentally superior, due to reducing the significant and unavoidable historic architecture impacts, this alternative 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.

