V. Alternatives

V. Alternatives

1. Introduction

The identification and analysis of alternatives to a project is a fundamental aspect of the environmental review process under CEQA. Specifically, Public Resources Code Section 21002.1(a) establishes the need to address alternatives in an EIR by stating that in addition to determining a project's significant environmental impacts and indicating potential means of mitigating or avoiding those impacts, "the purpose of an environmental impact report is… to identify alternatives to the project."

Direction regarding the consideration and discussion of project alternatives in an EIR is provided in CEQA Guidelines Section 15126.6, in part, as follows:

> An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. An EIR is not required to consider alternatives which are infeasible.

The CEQA Guidelines emphasize that the selection of project alternatives be based primarily on the ability to avoid or substantially lessen significant impacts relative to the proposed project, "even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly." The CEQA Guidelines further direct that the range of alternatives be guided by a "rule of reason," such that only those alternatives necessary to permit a reasoned choice are addressed. In selecting project alternatives for analysis, potential alternatives must be feasible. CEQA Guidelines Section 15126.6(f)(1) 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, other plans or regulatory limitations,

> jurisdictional boundaries…, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site….

Beyond these factors, CEQA Guidelines Section 15126.6(e) requires the analysis of a "no project" alternative and CEQA Guidelines Section 15126.6(f) requires an evaluation of alternative location(s) for the project, if feasible. Based on the alternatives analysis, an environmentally superior alternative is to be designated. If the environmentally superior alternative is the No Project Alternative, then the EIR shall identify an environmentally superior alternative among the other alternatives.

2. Overview of Alternatives to the Project

The intent of the alternatives analysis is to reduce the significant impacts of a project. As evaluated in Section IV, Environmental Impact Analysis, of this Draft EIR, implementation of the Project would not result in significant impacts to any of the environmental issues evaluated in this Draft EIR which could not be reduced with compliance with regulatory requirements and the implementation of project design features and mitigation measures. Accordingly, the identification of alternatives to the Project was based, in part, on comments received during the Notice of Preparation scoping and public consultation period and the objectives established for the Project (listed in Section II, Project Description, of this Draft EIR). The following alternatives to the Project are evaluated in this section:

- Alternative 1: No Project/No Build
- Alternative 2: Reduced Project
- Alternative 3: Simultaneous Event Schedules

Each of these alternatives is described and evaluated below.

3. Alternatives Considered and Rejected

As set forth in CEQA Guidelines Section 15126.6(c), an EIR should identify any alternatives that were considered for analysis but rejected as infeasible and briefly explain the reasons for their rejection. According to the CEQA Guidelines, among the factors that may be used to eliminate an alternative from detailed consideration is the alternative's failure to meet most of the basic project objectives, the alternative's infeasibility, or the alternative's inability to avoid significant environmental impacts. Alternatives to the Project that have been considered and rejected as infeasible include:

- **Alternative Site:** To meet the Project's underlying purpose to enhance on-site programs, expand opportunities for diverse County residents to come together, and ensure the future of the existing Amphitheatre as an active and relevant historic resource, the County has identified improvements that are needed to transform the existing Ford Theatres into a multi-use cultural and recreational destination while addressing existing critical program needs of the regional arts ecosystem. Accordingly, the objectives of the Project are closely tied to the concept of improving existing conditions on the Project Site by creating a cohesive and integrated multi-use cultural and recreational destination with enhanced and new technologically advanced performing arts facilities with supporting uses and creating recreational opportunities.

  As described in Section II, Project Description, of this Draft EIR, the Project Site is currently developed with an Amphitheatre and already operates as a performing arts venue. In addition, the 32-acre Project Site is also already a designated County regional park, which is comprised primarily of undeveloped open space. As such, the development of the proposed improvements within the existing Project Site would be consistent with and would complement and enhance the existing setting and uses within the Project Site. Therefore, given the Project Site's unique location and the unavailability of large expanses of land such as the Project Site within Los Angeles County, it is not reasonable to assume that a property of the same size and character that is developed with a large theatre would be available for the County to acquire. In addition, since the County owns the existing property, the County currently does not incur any land costs. Furthermore, since one of the key objectives of the Project is to provide an on-site natural progression of appropriately-sized rehearsal and performing arts spaces which can be used at the same time, development of the Project on an alternative site could also require construction of a large theatre similar to the existing on-site Amphitheatre in addition to the Project components so that a natural progression of theatre spaces are all provided in one location. As such, development of the Project on an alternative site would likely result in greater impacts compared to the Project. Additionally, one of the key components of the underlying purpose of the Project is to ensure the future of the existing on-site Amphitheatre as an active and relevant historic resource. As the proposed Amphitheatre rehabilitation improvements are limited to the Project Site, development of the Project on an alternative site would not achieve the underlying purpose or the basic Project objectives related to enhancing the existing Project Site and preserving the historic integrity of the existing Amphitheatre.

  Based on the above, an alternative site is not considered feasible as it would fail to achieve the underlying purpose of the Project and the basic Project objectives. In addition, development at an alternative site likely would not reduce any of the Project's already less than significant impacts. Further, it is not expected that the County can reasonably acquire, control, or have access to an alternative site within Los Angeles that would provide for the uses contemplated for the Project.

Thus, in accordance with Section 15126.6(f) of the State CEQA Guidelines, this alternative was rejected from further consideration.

- **Improved Parking Only:** This Alternative assumes the existing facilities would be maintained and the two existing surface parking areas along Cahuenga Boulevard East would be replaced by two parking structures providing a combined 500 spaces. This Alternative was suggested during the Notice of Preparation scoping and public consultation period.

  While this Alternative would reduce some of the Project's already less than significant impacts, similar to the No Project/No Build Alternative analyzed below, this Alternative would be expected to result in greater impacts with regard to surface water quality and groundwater quality. Specifically, this Alternative would not implement the Project's Best Management Practices, such as catch basins and planter drains, which would result in an improvement in surface water quality runoff from the Project Site as the Project Site currently does not have BMPs in place for the treatment of stormwater runoff from the existing impervious surfaces. Therefore, while significant impacts to surface water quality would not occur under this Alternative, impacts would be greater than those of the Project. In addition, without the development of any of the performing arts facilities, offices, restaurant, hiking trail, and other supporting uses, this Alternative would not realize the underlying purpose of the Project to enhance on-site programs that support the work of County of Los Angeles artists and arts organizations by offering programs that meet the specialized needs of a broader cross section of the regional arts community, including emerging theatre, dance, and music ensembles and multi-disciplinary collaborations; to expand opportunities for diverse County residents to come together by creating new spaces and programs that better serve the community; and to ensure the future of the Amphitheatre as an active and relevant historic resource. Similarly, this Alternative would not support the objectives of the Project regarding rehabilitation of the Amphitheatre and artist and patron enhancements. Therefore, an alternative that only implements the parking proposed as part of the Project is not considered feasible as it would fail to achieve the underlying purpose and basic Project objectives. Thus, in accordance with Section 15126.6(f) of the State CEQA Guidelines, this alternative was rejected from further consideration.

4. Analysis Format

In accordance with CEQA Guidelines Section 15126.6(c) and Section 15126.6(d), each alternative is evaluated in sufficient detail to determine whether the overall environmental impacts would be less, similar, or greater than the corresponding impacts of the Project. Furthermore, each alternative is evaluated to determine whether the Project objectives identified in Section II, Project Description, of this Draft EIR would be mostly attained by the alternative. The evaluation of each of the alternatives follows the process described below:

a. The net environmental impacts of the alternative after implementation of reasonable mitigation measures are determined for each environmental issue area analyzed in this Draft EIR.

b. Post-mitigation significant and non-significant environmental impacts of the alternative and the Project are compared for each environmental issue area as follows:

- Less: Where the net impact of the alternative would be clearly less adverse or more beneficial than the impact of the Project, the comparative impact is said to be "less."

- Greater: Where the alternative's net impact would be clearly more adverse or less beneficial than the impact of the Project, the comparative impact is said to be "greater."

- Similar: Where the impacts of the alternative and the Project would be roughly equivalent, the comparative impact is said to be "similar."

c. The comparative analysis of the impacts is followed by a general discussion of whether the underlying purpose and most of the basic Project objectives would be attained by the alternative.

Table V-1 on page V-6 provides a summary matrix that compares the impacts associated with the Project with the impacts of each of the analyzed alternatives. As provided in Table V-1, an alternative may result in "no impact," where implementation of the proposed improvements would not result in a change in the physical conditions within the area that would create an impact with regards to the environmental topic analyzed. Impacts may also be considered "less than significant," where implementation of the proposed improvements would result in a change in the physical conditions within the area that would be below the thresholds of significance and not create an adverse effect.

Table V-1
Comparison of Impacts Associated with the Project and Impacts of the Alternatives

Environmental Issue	Project Impact	Alternative 1: No Project/No Build	Alternative 2: Reduced Project—No 299-Seat Theatre	Alternative 3: Simultaneous Event Schedules
A. AESTHETICS				
Aesthetics	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)
Views	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
Light	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)
Glare	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)
B. AIR QUALITY				
Construction—Regional Emissions	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)
Construction—Localized Emissions	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)
Operational—Regional Emissions	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)
Operational—Localized Emissions	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)
Toxic Air Contaminants	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)
Odors	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)
C. GREENHOUSE GAS EMISSIONS				
Greenhouse Gas Emissions	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)

Table V-1 (Continued)
Comparison of Impacts Associated with the Project and Impacts of the Alternatives

Environmental Issue	Project Impact	Alternative 1: No Project/No Build	Alternative 2: Reduced Project—No 299-Seat Theatre	Alternative 3: Simultaneous Event Schedules
D. BIOLOGICAL RESOURCES				
Biological Resources	Less Than Significant with Mitigation	Less (No Impact)	Similar (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)
E. CULTURAL RESOURCES				
Historic Resources	Less Than Significant with Mitigation	Less (No Impact)	Similar (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)
Archaeological Resources	Less Than Significant with Mitigation	Less (No Impact)	Similar (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)
Paleontological Resources	Less Than Significant with Mitigation	Less (No Impact)	Similar (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)
F. GEOLOGY AND SOILS				
Geology and Soils	Less Than Significant With Mitigation	Less (No Impact)	Similar (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)
G. HYDROLOGY, SURFACE WATER QUALITY, AND GROUNDWATER				
Hydrology	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
Surface Water Quality	Less Than Significant	Greater (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)
Groundwater Hydrology	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)

Table V-1 (Continued)
Comparison of Impacts Associated with the Project and Impacts of the Alternatives

Environmental Issue	Project Impact	Alternative 1: No Project/No Build	Alternative 2: Reduced Project—No 299-Seat Theatre	Alternative 3: Simultaneous Event Schedules
Groundwater Quality	Less Than Significant	Greater (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)
H. LAND USE AND PLANNING				
Land Use Consistency	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
I. NOISE				
Construction Noise	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)
Construction Vibration (Building Damage)	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)
Construction Vibration (Human Annoyance)	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)
Operational Noise	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)
J. PUBLIC SERVICES				
Fire Protection	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)
Police Protection	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)
K. TRAFFIC, ACCESS, AND PARKING				
Construction	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)

Table V-1 (Continued)
Comparison of Impacts Associated with the Project and Impacts of the Alternatives

Environmental Issue	Project Impact	Alternative 1: No Project/No Build	Alternative 2: Reduced Project—No 299-Seat Theatre	Alternative 3: Simultaneous Event Schedules
Intersection Level of Service	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Greater (Significant)
Congestion Management Plan	Less Than Significant	Greater (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)
Access and Circulation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)
Parking	Less Than Significant	Greater (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)
L. UTILITIES				
Water	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)
Energy	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)

Source: Matrix Environmental, 2014.

VI. Alternatives

A. Alternative 1: No Project/No Build

1. Description of the Alternative

In accordance with the CEQA Guidelines, the No Project Alternative for a development project on an identifiable property consists of the circumstance under which a proposed project does not proceed. Section 15126.6(e)(3)(B) of the CEQA Guidelines states: "In certain instances, the No Project Alternative means 'no build' wherein the existing environmental setting is maintained. However, where failure to proceed with the project will not result in the preservation of existing environmental conditions, the analysis should identify the practical result of the project's non-approval and not create and analyze a set of artificial assumptions that would be required to preserve the existing physical environment." Accordingly, for purposes of this analysis, Alternative 1, the No Project/No Build Alternative assumes the Project would not be approved, and the existing environment would be maintained, with the exception of the previously approved Amphitheatre improvements and other on-going routine interior and exterior maintenance improvements. Specifically, as described in Section II, Project Description, of this Draft EIR, in September 2013, the County prepared and approved a Notice of Exemption pursuant to CEQA Guidelines, Article 19, Section 15331, Historical Resource Restoration/Rehabilitation (Class 31) for the restoration and rehabilitation of portions of the existing Amphitheatre. The previously approved Amphitheatre improvements will provide for hillside stabilization, stage reconstruction, disabled access and code compliance improvements, theatrical systems infrastructure improvements, and mechanical and electrical systems upgrades. The previously approved Amphitheatre improvements will occur internal to the Project Site, within the boundaries of the existing Amphitheatre. This Alternative would not result in any changes to the existing operations at the Ford Theatres. The site plan under this Alternative would resemble existing conditions, as illustrated in Figure II-2 in Section II, Project Description of this Draft EIR.

2. Environmental Impact Analysis

a. Aesthetics, Views, Light, and Glare

(1) Aesthetics

Alternative 1 would not include development of any of the components proposed as part of the Project. In addition, implementation of the previously approved Amphitheatre

improvements would occur internal to the Project Site. Other routine maintenance activities would also be limited. As such, there would be no potential for construction activities that would temporarily alter the visual appearance of the Project Site. Therefore, no visual quality impacts associated with construction would occur, and aesthetics impacts under Alternative 1 would be reduced in comparison to the less than significant impacts of the Project.

Similarly, as Alternative 1 would not alter the existing uses on the Project Site, introduce new buildings on the Project Site, or change the appearance of the Project Site, no operational impacts related to aesthetics would occur under Alternative 1. Accordingly, the aesthetics impacts of Alternative 1 would be reduced in comparison to the less than significant impacts of the Project.

(2) Views

As no development would occur under Alternative 1, existing views of or across the Project Site would not be altered and no on-site visual resources would be affected. Therefore, Alternative 1 would have no potential to obstruct an existing, publicly available, recognized view resource. No impacts related to views would occur under the No Project/No Build Alternative, and impacts would be reduced in comparison to the less than significant impacts of the Project.

(3) Light and Glare

Alternative 1 would not result in the construction of any new development on-site. In addition, based on the limited nature of the previously approved Amphitheatre improvements as well as other routine maintenance activities, this Alternative would not introduce substantial light sources associated with construction equipment or construction-related equipment and materials with the potential to cause substantial glare. No construction-related impacts with regard to light and glare would occur under Alternative 1, and such impacts would be reduced compared to the less than significant impacts of the Project.

The No Project/No Build Alternative would not alter the existing uses on the Project Site, or introduce any new sources of light or glare. Therefore, Alternative 1 would not change the existing lighting environment on the Project Site. No operation-related light and glare impacts would occur under this Alternative and such impacts would be reduced in comparison to the less than significant impacts of the Project.

b. Air Quality

(1) Construction

The No Project/No Build Alternative would not include any new development proposed as part of the Project. In addition, given the nature of the previously approved Amphitheatre improvements and other limited routine maintenance activities, such activities would not generate substantial air pollutant emissions. As such, construction-related regional and localized air quality impacts under this Alternative would not occur, and such impacts would be reduced compared to the Project's less than significant impacts.

Similarly, Alternative 1 would not result in diesel particulate emissions that could generate toxic air contaminants (TACs) or produce odors associated with construction activities. Therefore, no impacts associated with the release of TACs and odors during construction would occur under this Alternative, and such impacts would be less than the less than significant impacts of the Project.

(2) Operation

Alternative 1 would not result in any operational emissions related to vehicular traffic or the consumption of electricity and natural gas beyond those currently generated by existing uses on-site. Therefore, this Alternative would have no operational air quality impacts, and impacts would be reduced compared to the less than significant regional and localized impacts of the Project.

As set forth in Section IV.B, Air Quality, of this Draft EIR, the primary sources of potential air toxics associated with Project operations would include diesel particulate matter from delivery trucks and to a lesser extent, facility operations. As the No Project/No Building Alternative would not result in new development or increased operations on-site, no new operational diesel particulate matter emissions would occur. Therefore, no operational impacts associated with TACs would occur under the Alternative 1, and such impacts would be reduced compared to the Project.

As no development would occur under the No Project/No Build Alternative, no operational odor impacts would occur, and such impacts would be reduced compared to the less than significant impacts of the Project.

c. Greenhouse Gas Emissions

Since there would be no new permanent development or operations on-site, no new greenhouse gas (GHG) emissions would occur. As such, no new impacts associated with

global climate change would occur, and impacts would be less than the less than significant impacts of the Project

d. Biological Resources

As previously described, Alternative 1 would not include development of any of the components proposed as part of the Project. In addition, implementation of the previously approved Amphitheatre improvements would occur internal to the Project Site, within the boundaries of the existing Amphitheatre. Other routine maintenance activities would also be limited to the existing structures and landscaping. As such, Alternative 1 would not disturb areas within the Project Site where potential biological resources and sensitive habitats may exist. In addition, as set forth in the Notice of Exemption for the previously approved Amphitheatre improvements, trees to be removed based on their health, root structure, and impact to the stabilization of the hillside facing the Amphitheatre stage would be replaced with new landscaping, including new trees and shrubs. Therefore, none of the plant communities, plant species, wildlife species, and oak trees that exist within the Project Site would be affected under Alternative 1. As such, no significant impacts to biological resources would occur under Alternative 1, and such impacts would be less than those of the Project's, which would be less than significant with implementation of mitigation measures.

e. Cultural Resources

(1) Historic Resources

The No Project/No Build Alternative would not involve construction activities with the potential to affect the character-defining features of the historic Amphitheatre. In addition, as set forth in the Notice of Exemption prepared and approved by the County for the rehabilitation of portions of the existing Amphitheatre, the proposed improvements intended to address long deferred maintenance and needed repairs would be consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties because the proposed improvements would preserve and be consistent with the historic use and character of the property. Therefore, no significant impacts to historic resources would result under Alternative 1, and impacts would be less than those of the Project, which would be less than significant with mitigation.

(2) Archaeological and Paleontological Resources

No substantial grading or other earthwork activities would occur under Alternative 1. Thus, there would be no potential for this Alternative to uncover subsurface archaeological and paleontological resources. No impacts to archaeological and paleontological

resources would result under the No Project/No Build Alternative, and impacts would be less than those of the Project, which would be less than significant with mitigation.

f. Geology and Soils

The Project Site is located within the seismically active region of Southern California; thus, as with the Project, Alternative 1 would be exposed to certain site-specific geologic hazards. However, as the No Project/No Build Alternative would not introduce new development on-site, the potential for impacts related to soil erosion during construction activities would not occur. In addition, this Alternative would not introduce new activities or increase the level of human activity within the Project Site. Therefore, the No Project/No Build Alternative would not expose additional people and structures to potential adverse effects associated with geologic hazards. No impacts related to geology and soils would occur under Alternative 1, and impacts would be less than those of the Project, which would be less than significant with mitigation.

g. Hydrology, Surface Water Quality, and Groundwater

(1) Hydrology

Under Alternative 1, no new development would occur and existing development would remain. In addition, the previously approved Amphitheatre improvements and other routine maintenance activities would occur within the boundaries of the existing development. Therefore, this Alternative would not alter the amount of pervious surfaces on the Project Site, and no modifications to the existing drainage patterns of the Project Site would occur. Further, as with the Project, this Alternative would include the proposed drainage improvements as part of the previously approved Amphitheatre improvements and would not result in an increase in the volume of runoff generated from the Project Site. Therefore, no impacts to hydrology would occur under Alternative 1, and impacts would be less than the less than significant impacts of the Project.

(2) Surface Water Quality

As no new development would occur under Alternative 1, no new pollutants from stormwater runoff would be introduced into the stormwater system. However, this Alternative would not implement the Project's Best Management Practices (BMPs), such as catch basins and planter drains, which would result in an improvement in surface water quality runoff from the Project Site as the Project Site currently does not have BMPs in place for the treatment of stormwater runoff from the existing impervious surfaces. Therefore, while significant impacts to surface water quality would not occur under this Alternative, impacts would be greater than those of the Project.

(3) Groundwater

Under Alternative 1 no new development would occur, and the Project Site would remain in its existing condition. Therefore, potential changes to groundwater levels that could affect groundwater hydrology from conversion of impervious to pervious surfaces would not occur. No impacts to groundwater hydrology would occur under Alternative 1 and impacts would be reduced compared to the less than significant impacts of the Project.

With regard to groundwater quality, since no new development would occur under Alternative 1, no new pollutants from stormwater runoff would be introduced into the groundwater via infiltration from available landscape areas. However, as Alternative 1 would not implement the Project's BMPs, groundwater quality would not be improved as under the Project. Therefore, impacts to groundwater quality under Alternative 1 would be greater than the Project, although still less than significant.

h. Land Use and Planning

Under the No Project/No Build Alternative, there would be no changes to the existing land uses on-site. The existing theatre and support uses would continue to operate, and, as with the Project, the existing site land use and zoning designations would remain. In addition, no land use approvals or permits would be required. Therefore, Alternative 1 would not result in any inconsistencies with existing land use plans and policies that govern the Project Site. No impacts associated with consistency with land use regulations and plans would occur and, impacts would be less than the less than significant impacts of the Project.

i. Noise

(1) Construction

The No Project/No Build Alternative would not include any new development proposed as part of the Project. On-site construction activities would be limited to the previously approved Amphitheatre improvements and other limited routine maintenance activities that would generate limited noise and vibration within the Project Site. Thus, no impacts with regard to construction noise and vibration would occur under the No Project/No Build Alternative. Such impacts would be less than those of the Project.

(2) Operation

With regard to operation, the No Project/No Build Alternative would not introduce new on-site noise sources and would not result in an increase in off-site auto traffic. As such, no new or increased sources of noise within the Project vicinity would occur as a

result of this Alternative. Therefore, no impact with respect to operational noise would occur under Alternative 1, and impacts would be less than those of the Project.

j. Public Services

(1) Fire Protection

Alternative 1 would not involve any new development or otherwise result in changes to existing site operations. Therefore, this Alternative would not increase the level of activity on the Project Site or increase the service population for the City of Los Angeles Fire Department (LAFD) stations that serve the Project Site. No impacts to fire protection services would occur, and impacts would be less than the less than significant impacts of the Project.

(2) Police Protection

Alternative 1 would not involve any new development or otherwise result in changes to existing site operations. Therefore, this Alternative would not increase the daytime service population on-site or have the potential to increase calls for police protection services from the Los Angeles Sheriff's Department (LASD) and the City of Los Angeles Police Department (LAPD). No impacts to police protection services would occur, and impacts would be less than the less than significant impacts of the Project.

k. Traffic, Access, and Parking

Under Alternative 1, all transportation conditions would remain the same as current conditions. As construction activities under Alternative 1 would be limited to maintenance activities there would be no significant construction traffic impacts with this Alternative. In addition, as there would be no new development, there would be no additional trips generated by this Alternative, and no difference in overall transportation conditions from current conditions. Thus, there would be no impacts regarding traffic, access, and parking under Alternative 1, and impacts would be less than those of the Project.

l. Utilities and Service Systems

(1) Water

Alternative 1 would not involve construction activities which would generate a substantial short-term demand for water. As such, no construction-related impact to water supply and infrastructure would occur under the No Project/No Build Alternative, and impacts would be reduced compared to the less than significant impacts of the Project.

No changes to existing land uses or site operations would occur under Alternative 1. Therefore, no increase in the Project Site's long-term water demand would occur. No operational impacts to water supply and water infrastructure would occur, and impacts would be less than the less than significant impacts of the Project.

(2) Energy

The No Project/No Build Alternative would not involve construction activities which would generate a substantial short-term demand for electricity. In addition, construction activities would not involve the consumption of natural gas. As such, no construction-related impacts to energy would occur, and such impacts would be less than the less than significant impacts of the Project.

No changes to existing land uses or site operations would occur under Alternative 1. Therefore, no increase in energy consumption from the Project Site would occur. No operational impacts to energy would occur, and impacts would be less than the less than significant impacts of the Project.

3. Comparison of Impacts

As analyzed above, impacts to aesthetics, views, light, and glare; air quality; greenhouse gas emissions; biological resources; historical, archaeological, and paleontological resources; geology and soils; hydrology, surface water quality during construction, groundwater hydrology and groundwater quality during construction; land use and planning; noise; fire and police protection; traffic, access, and parking; and water and energy would be reduced as compared to the Project. However, impacts with regard to surface water quality and groundwater quality during operation would be greater than the Project.

4. Relationship of the Alternative to Project Objectives

No new development would be introduced on the Project Site under Alternative 1, and the existing uses on the Project Site would continue to operate as they do currently. However, as with the Project, this Alternative would include implementation of the previously approved Amphitheatre improvements. The previously approved Amphitheatre improvements would include hillside stabilization, stage reconstruction, disabled access and code compliance improvements, theatrical systems infrastructure improvements, and mechanical and electrical systems upgrades. Implementation of these improvements would address long deferred maintenance and needed repairs, mitigation of water infiltration, provision of slope stabilization, and improvements to the theatrical infrastructure

and performer amenities. As such, Alternative 1 would meet the Project's objective to preserve the historic integrity of the Amphitheatre by providing improvements necessary to respond to damage from water intrusion, soil erosion, and structural decay, and ensure its future viability as a cultural and historical resource for the communities of Los Angeles County. In addition, as the previously approved Amphitheatre improvements would occur within the boundaries of the existing Amphitheatre, Alternative 1 would also meet the Project objective to provide site improvements that are focused on areas of the site that have been previously developed and preserve the canyon setting of the Project Site. While this Alternative would include theatrical systems infrastructure improvements as part of the previously approved Amphitheatre improvements, Alternative 1 would not provide for the additional Amphitheatre rehabilitation improvements proposed as part of the Project. Therefore, this Alternative would not meet the following objective to the same extent as the Project: provide operational improvements for the historic outdoor Amphitheatre that includes modern technical infrastructure and performing arts technology and amenities to support world class theatrical and cultural experiences for patrons and program participants while providing improved access to the Ford Theatres and its canyon park setting as a public cultural and recreational destination.

Additionally, as Alternative 1 would not include the development of any new facilities, this Alternative would not meet the Project's objectives regarding additional artist and patron enhancements. Specifically, without the development of the 299-seat theatre and the Flex Space proposed under the Project, this Alternative would not meet the objective to support the development of Los Angeles County-based artists, arts organizations and arts producers that represent diverse performing arts genres, disciplines, and communities by providing an on-site natural progression of appropriately-sized enclosed rehearsal and performing arts spaces which can be used at the same time to expand creative capacity, create new work, and increase audiences. Similarly, Alternative 1 would not achieve the Project objective to repurpose the areas of the Ford Theatres currently used for on-grade parking to meet existing critical program needs of the regional arts ecosystem, including a much needed mid-size theatre space and low- to no-cost, accessible flexible spaces for rehearsals and performances year-round for artists, particularly dance and theatre groups, which do not have sufficient right-sized rehearsal and performance spaces in Los Angeles County. Furthermore, since Alternative 1 would not include the development of new plaza areas or the proposed restaurant and structured parking, this Alternative would not support the following Project objectives: enhance patron pre-show and post-show experience by providing plaza areas and support functions for meeting, dining and picnicking, while enabling visits of variable lengths by the creation of non-stacked parking to ease ingress and egress; and further the Ford's capacity for community building by creating new small and medium interstitial spaces and opportunities for artists, audiences, and the public to interact, dialogue, and find meaning and expression through the arts on the Project Site.

Alternative 1 would also not develop a Transit Center or include pedestrian and vehicular circulation improvements and, as such, would not achieve the objective to create pedestrian and vehicular circulation access that is integrated with a transit center and sufficient on-site parking so as to provide for improved and safer patron arrival and departures. In addition, as this Alternative does not propose a hiking trail, Alternative 1 would not meet the Project objective to enhance the Ford Theatres' role as a County Regional Park by increasing public access to the entire site, integrating passive recreational opportunities, and encouraging visitors to experience the natural landscape and views or surrounding iconic landmarks from a formal trail within the park boundary. Further, since this Alternative would not include the installation of an enhanced sound wall, Alternative 1 would also not support the objective to mitigate noise pollution from the adjacent Hollywood Freeway to provide a more pastoral experience focused on the stage and preserve audience views of the natural landscaped canyon from inside the Amphitheatre. Additionally, without development of the Ford Terrace, Alternative 1 would not provide for improved operation and maintenance relating to stage logistics including set loading and unloading and set staging areas in close proximity to the Amphitheatre. Lastly, Alternative 1 would not construct any of the proposed offices and, as such, would not support the objective to provide on-site accessible modern office space to accommodate daily personnel and improve communication and interaction of staff with the arts community.

Overall, Alternative 1, the No Project/No Build Alternative, would not meet most of the Project objectives, nor would it meet the Project's underlying purpose to enhance on-site programs that support the work of County of Los Angeles artists and arts organizations by offering programs that meet the specialized needs of a broader cross section of the regional arts community, including emerging theatre, dance, and music ensembles and multi-disciplinary collaborations; to expand opportunities for diverse County residents to come together by creating new spaces and programs that better serve the community; and to ensure the future of the Amphitheatre as an active and relevant historic resource.

VI. Alternatives

B. Alternative 2: Reduced Project Alternative

1. Description of the Alternative

The Reduced Project Alternative would develop the Project Site similar to the Project and would include the same components as the Project as follows: rehabilitation of certain portions of the existing Amphitheatre, the Ford Terrace, the Ford Plaza, the Transit Center, and a 0.75-mile hiking trail. However, the Reduced Project Alternative would not include development of the 299-seat theatre within the Ford Plaza. In addition, under this Alternative, the 99-seat Flex Space proposed within the Transit Center would be relocated to the area of the 299-seat theatre as proposed by the Project. With the relocation of the Flex Space from the Transit Center to the Ford Plaza under this Alternative, the footprint of the Transit Center would be reduced but would continue to feature a designated area for bus and valet drop-off, a three-level parking structure, and a maintenance facility. All other components and features of the Project as described in Section II, Project Description, of this Draft EIR would be maintained under the Reduced Project Alternative. Further, under Alternative 2, building heights and architectural features would be similar to the building heights and architectural features of the Project.

Overall, implementation of this Alternative would result in approximately 39,550 net new square feet compared to the Project's approximately 47,550 net new square feet of development. As such, this Alternative would reduce the proposed net new development by approximately 8,000 square feet or approximately 17 percent. Additionally, this Alternative would provide for 12 net new seats within the Project Site in comparison to the Project's 311 net new seats. In addition, while this Alternative would not provide the 299-seat theatre, the number of annual events and attendees would increase but would be reduced when compared to the Project.

2. Environmental Impact Analysis

a. Aesthetics, Views, Light, and Glare

(1) Aesthetics

Similar to the Project, the Reduced Project Alternative would temporarily alter the visual appearance of the Project Site due to the removal of existing buildings, surface

parking areas, and landscaping. Other construction activities, such as site preparation and grading, the staging of construction equipment and materials, and the construction of new structures would also temporarily alter the visual quality of the Project Site. As this Alternative would not include development of the 299-seat theatre, the overall amount of building construction and associated construction activities would be reduced compared to the Project. As with the Project, development of the Reduced Project Alternative would not cause the loss of unique visual resources or prominent existing features that contribute positively to the existing visual character and quality of the Project Site. Impacts to aesthetics during construction would be less than significant and less than the Project's less than significant impacts.

As with the Project, the Reduced Project Alternative would alter the existing visual character of the Project Site due to the rehabilitation of certain portions of the Amphitheatre and the development of the Ford Terrace, the Ford Plaza, the Transit Center, and a 0.75-mile hiking trail. As described above, these Project components would be developed similar to the Project, except that the 299-seat theatre would not be included within the Ford Plaza and the Flex Space proposed within the Transit Center would be relocated to the Ford Plaza within the area proposed for the 299-seat theatre. The development of a reduced Transit Center and the removal of the 299-seat theatre would reduce the building area and massing within the Project Site compared to the Project. In addition, as building heights proposed under this Alternative would be similar to the Project, the buildings proposed under this Alternative would be similarly compatible with the surrounding area. Further, as with the Project, this Alternative would incorporate architectural design features such as variations in building planes to reduce massing and introduce new landscaping to enhance the existing site and provide visual relief. Other Project features, including signage and lighting would be implemented similar to the Project and would not degrade the existing visual character of the area. Additionally, as with the Project, proposed structures would be designed to complement the existing historic character of the Ford Theatres and be consistent with the Secretary of the Interior Standards for Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings. In summary, impacts to aesthetics under the Reduced Project Alternative would be less than significant and less than the less than significant impacts of the Project.

(2) Views

As described in Section IV.A, Aesthetics, Views, Light, and Glare, of this Draft EIR, valued visual resources within the Project Site include the hillsides surrounding the existing developed areas of the Project Site as well as the historic portions of the Amphitheatre, which are generally only visible from areas within the Project Site. As with the Project, development of this Alternative would visually fill-in existing surface parking areas fronting Cahuenga Boulevard East with new development. While this Alternative would not

construct the 299-seat theatre within the Ford Plaza, the Flex Space proposed as part of the Transit Center would be relocated within the area proposed for the 299-seat theatre. Therefore, as the 299-seat theatre and the Flex Space would occupy generally the same building footprint, no substantial visual changes are anticipated within the Ford Plaza from removal of the 299-seat theatre. Similarly, as the Flex Space under the Project has been designed as an extension of the north parking structure such that these two structures visually appear as one building, the relocation of the Flex Space to the Ford Plaza would also not result in substantial view changes within the Transit Center. Therefore, similar to the Project, given the topography of the Project Site and the location of existing development within a canyon setting, the natural hillsides would remain a prominent feature from public vantages. In addition, this Alternative would implement similar architectural features as the Project, including light-colored materials, and perimeter landscaping, which would serve to soften the visual effect on views along Cahuenga Boulevard East. Other Project features, including the relocation of the existing cell towers and the potential installation of electrical poles, would be implemented similar to the Project and would have similar effects on views. Overall, like the Project, with implementation of this Alternative, public views of the Project Site would continue to feature a semi-urban environment with a background of rolling hills, pockets of trees, and landscaping. Therefore, as with the Project, view impacts would be less than significant. Such impacts would be similar to those of the Project.

(3) Light and Glare

(a) Construction

As with the Project, substantial lighting is not anticipated during construction within the Project Site as most construction activities would occur during daylight hours. In addition, similar to the Project, to the extent construction activities during winter includes artificial light sources, such use would be temporary and would cease upon completion of construction activities. The Reduced Project Alternative would also implement the same project design feature related to construction lighting, which would provide that construction lighting be shielded and/or aimed so that no direct beam illumination would fall outside of the Project Site boundary. Therefore, like the Project, light impacts associated with construction would be less than significant under this Alternative. However, such impacts would be reduced compared to the Project due to the reduced construction activities.

Similar to the Project, any glare generated during construction of this Alternative would be highly transitory and short-term given the movement of construction equipment and materials within each area of the Project Site. In addition, large surfaces that are usually required to generate substantial glare are typically not an element of construction activities. Therefore, as with the Project, no significant impact related to construction glare would occur under this Alternative. As the amount of development proposed under this Alternative would be reduced compared to the Project, thereby reducing the potential for

glare from construction equipment and materials, such impacts would be less than those of the Project.

(b) Operation

Similar to the Project, the Reduced Project Alternative would increase light levels within the Project Site and the surrounding area through the introduction of new light sources, including accent lighting to highlight architectural features, landscape elements, and the Project's signage; light boxes on the north parking structure, the restaurant, and the proposed sound wall to illuminate the façades; exterior lighting to provide clear identification of circulation, gathering spaces, parking facilities and for security purposes; and new theatrical lighting within the Amphitheatre. However, this Alternative would not introduce any additional lighting from the 299-seat theatre proposed by the Project. Therefore, the number of new lighting sources would be reduced as compared to the Project. Overall, as with the Project, the Reduced Project Alternative would not significantly increase nighttime lighting levels in the area and impacts with regard to lighting would be less than significant. However, such impacts would be less compared to the Project due the reduced development under this Alternative.

This Alternative would be anticipated to use the same building materials as the Project, including plaster, concrete, metal panels, fritted glass, and cement board. This Alternative would also implement the same project design feature as the Project regarding the use of non-reflective windows, glass, and metal or use of standard low-reflective or non-reflective glazing. The replacement of existing surface parking areas with structured parking similar to the Project would also reduce the potential for daytime glare from windows of parked vehicles. Thus, as with the Project, impacts related to glare under Alternative 2 would be less than significant. However, such impacts would be reduced compared to the Project due to the reduced development under this Alternative.

b. Air Quality

(1) Construction

(a) Regional and Localized Air Quality Impacts

As with the Project, construction of this Alternative would generate pollutant emissions through the use of heavy-duty construction equipment and through haul truck and construction worker trips. The overall amount of site preparation and building construction would be less under this Alternative compared to the Project due to the decrease in square footage to be developed under this Alternative. Therefore, pollutant emissions from construction activities would be less on a daily basis, as the intensity and not the duration of these activities would decrease compared to the Project. Thus, overall

construction emissions generated by this Alternative would be less than those of the Project over the construction period. Similarly, impacts during maximum conditions, those used for measuring significance, would be less than those of the Project. As such, similar to the Project, regional and localized emissions would be less than significant. However, such impacts would be less than those of the Project.

(b) Toxic Air Contaminants

With respect to construction air toxics, diesel particulate emissions associated with heavy equipment operations during grading and excavation activities represent the greatest potential for TAC emissions. As noted above, the construction emissions generated by this Alternative would be less than those of the Project over the construction period and thus would result in reduced diesel particulate emissions. In addition, as with the Project, there would be no residual emissions after construction and corresponding individual cancer risk. Therefore, like the Project, construction-related air toxic emission impacts of this Alternative would be less than significant and less than those of the Project.

(c) Odors

As with the Project, this Alternative would have the potential to produce odors during construction associated with the operation of construction equipment, the application of asphalt, the application of architectural coatings and other interior and exterior finishes, and roofing. However, like the Project, any odors produced during construction of this Alternative would dissipate away from the construction area and would be quickly diluted. Thus, as with the Project, impacts associated with objectionable odors during construction would be less than significant. However, such impacts would be reduced under this Alternative compared to the Project due to the reduction in construction emissions.

(2) Operation

(a) Regional and Localized Air Quality Impacts

Based on the reduction in square footage, the number of daily trips generated by this Alternative would be reduced compared to the Project. As vehicular emissions are dependent on the number of trips, vehicular sources would have a similar decrease in pollutant emissions compared to the Project. With the reduction in overall square footage, both area sources and stationary sources would also generate a similar reduction in pollutant emissions. As the overall square footage and vehicular trips associated with this Alternative would decrease in comparison to the Project, regional operational emissions under this Alternative would be less than those of the Project, and like the Project would be less than significant.

As described in Section IV.B, Air Quality, of this Draft EIR, localized operational impacts are determined by the peak hour intersection traffic volumes. Therefore, the decrease in operational trips during the peak hours associated with this Alternative would contribute to a proportionate decrease in localized emissions of carbon monoxide. Since the localized CO hotspot analysis for the Project did not result in any significant localized CO impacts and as traffic volumes would decrease with this Alternative, similar to the Project, localized impacts would be less than significant under this Alternative. However, such impacts would be less than those of the Project.

(b) Toxic Air Contaminants

As set forth in Section IV.B, Air Quality, of this Draft EIR, the primary sources of potential air toxics associated with Project operations would include diesel particulate matter from delivery trucks and to a lesser extent, natural gas equipment. With the reduction in daily trips and square footage, this Alternative would reduce the Project's operational diesel particulate matter emissions associated with increased truck deliveries. Thus, similar to the Project, this Alternative would result in a less-than-significant air quality impact associated with air toxics. However, such impacts would be reduced compared to the Project.

(c) Odors

As with the Project, this Alternative would not include any uses identified by the SCAQMD as being associated with odors. Therefore, similar to the Project, potential odor impacts would be less than significant under this Alternative and would be less than those of the Project due to the reduction in building square footage.

c. Greenhouse Gas Emissions

As with the Project, this Alternative would incorporate numerous project design features to reduce GHG emissions and would be designed to target the criteria for LEED Certification designation. With consideration of this Alternative's design features to reduce cumulative GHG, this Alternative would emit fewer GHG than the Project due to its reduction in daily trips relative to the Project. By incorporating energy and vehicle trip reducing features such as designing, constructing, and operating the Project to target LEED certification, this Alternative would be similar to the Project and would result in a reduction in GHG emissions from "business-as-usual" consistent with the goals of the State of California and County of Los Angeles, and is considered less than significant. Such impacts would be less than those of the Project.

d. Biological Resources

While the Reduced Project Alternative would not include development of the 299-seat theatre, this Alternative would disturb the same general Project Site area at-grade. As such, the Project's potential impacts with regard to plant communities, plant species, wildlife species, wildlife movement, and oak trees would also occur under the Reduced Project Alternative. To reduce potential impacts to biological resources, this Alternative would also implement the same mitigation measures proposed by the Project. Therefore, as with the Project, potential impacts to biological resources under this Alternative would be less than significant with mitigation. Such impacts would be similar to those of the Project.

e. Cultural Resources

(1) Historic Resources

While the Reduced Project Alternative would not include development of the 299-seat theatre, this Alternative would disturb the same general Project Site area at-grade and would include removal of the same structures proposed under the Project. Therefore, as with the Project, the rehabilitation of portions of the Amphitheatre and development of the Ford Terrace, Ford Plaza, Transit Center, and the hiking trail would not be anticipated to result in a substantial adverse change in the significance of the Ford Theatres as a historic resource. Notwithstanding, similar to the Project, given the fluid nature of architectural designs until the approval of final design plans, impacts with regards to historic resources could be potentially significant. The Reduced Project Alternative would implement the same mitigation measure as the Project to ensure the design is consistent with the Secretary of the Interior Standards. Therefore, impacts to historic resources under Alternative 2 would be less than significant with mitigation and similar to the Project.

(2) Archaeological and Paleontological Resources

While the Reduced Project Alternative would not include development of the 299-seat theatre, this Alternative would disturb the same general Project Site area at-grade. Therefore, this Alternative would result in a similar volume of excavated soil and a similar maximum depth of excavation. As such, the potential for the Reduced Project Alternative to uncover subsurface archaeological and paleontological resources would be similar to that of the Project. In the event archaeological and paleontological resources are encountered, this Alternative would be subject to the same mitigation and regulatory requirements as the Project to ensure that the resources are properly recovered and evaluated. Therefore, impacts relative to archaeological and paleontological resources under the Reduced Project Alternative would be similar to those of the Project, which would be less than significant with mitigation.

f. Geology and Soils

The Project Site is located within the seismically active region of Southern California; thus, as with the Project, Alternative 2 would be exposed to certain site-specific geologic hazards (e.g., ground shaking). In addition, as this Alternative would be developed within the same site as the Project and disturb the same general area as the Project, the Reduced Project Alternative would be exposed to the same potential hazards associated with liquefaction and lateral spreading, landslides and slope stability, and corrosive soils. As with the Project, the Reduced Project Alternative would be designed and constructed to conform to the current seismic design provisions of the California Building Code and the Los Angeles County Building Code. This Alternative would also implement the same mitigation measures as the Project to address potential impacts from liquefaction and lateral spreading and landslides and slope stability. Therefore, as with the Project, impacts due to strong seismic ground shaking, liquefaction and lateral spreading, and landslides and slope stability would be less than significant with mitigation. Like the Project, with compliance with California Building Code and County Building Code requirements, impacts with regard to corrosive soils would be less than significant. While the Reduced Project Alternative would disturb the same general areas as the Project, with elimination of the 299-seat theatre proposed under the Project, this Alternative would not introduce new activities or increase the level of human activity within the Project Site to the same extent as the Project. Therefore, the Reduced Project Alternative would expose fewer people and structures to potential geologic hazards within the Project Site. Therefore, impacts with regard to seismic ground shaking, liquefaction and lateral spreading, landslides and slope stability, and corrosive soils would be reduced compared to those of the Project.

The Reduced Project Alternative would involve similar grading and other earth-moving activities during construction, which could result in erosion. With compliance with regulatory requirements and implementation of appropriate BMPs like the Project, potential erosion impacts would be less than significant. Such impacts would be similar to those of the Project.

g. Hydrology, Surface Water Quality, and Groundwater

(1) Hydrology

Construction of the Reduced Project Alternative would require the removal of existing buildings, paving, and landscaping within the Project Site as well as earthwork activities (i.e., grading, excavation) to a similar extent as the Project. Therefore, as with the Project, construction activities under this Alternative would have the potential to temporarily alter existing drainage patterns and flows by exposing the underlying soils and making the Project Site temporarily more permeable. This potential would be similar to that of the Project since the construction area to be disturbed under this Alternative would resemble

that of the Project. Similar to the Project, during construction of the Reduced Project Alternative, runoff would be properly controlled through the implementation of a Storm Water Pollution Prevention Plan (SWPPP) and appropriate BMPs. Therefore, construction-related impacts on surface water hydrology under the Reduced Project Alternative would be less than significant, and such impacts would be similar to those of the Project.

Upon buildout, it is estimated that the Reduced Project Alternative would result in a similar net increase in the amount of impervious surfaces on-site as compared to the Project due to the similar area that would be developed. Like the Project, this Alternative would also implement the County's Low Impact Development (LID) requirements to manage post-construction stormwater runoff. Therefore, impacts to surface water hydrology during operation would be less than significant under Alternative 2 and similar to the less than significant impacts of the Project.

(2) Surface Water Quality

As with the Project, during construction of the Reduced Project Alternative, exposed and stockpiled soils could be subject to erosion and conveyance into nearby storm drains during storm events. In addition, construction activities such as earth moving, maintenance/operation of construction equipment, and handling/storage/disposal of materials could contribute to pollutant loading in stormwater runoff. On-site watering activities to reduce airborne dust could also contribute to pollutant loading in runoff. The degree to which new pollutants could be introduced to the site during construction would be reduced compared to the Project given the reduction in construction activities. In addition, like the Project, the Reduced Project Alternative would include a site-specific SWPPP that would specify BMPs and erosion control measures to be used during construction to minimize pollution in runoff. Therefore, as with the Project, construction-related impacts on surface water quality would be less than significant and such impacts would be less than those of the Project.

Similar to the Project, during operation of the Reduced Project Alternative, stormwater runoff from the Project Site has the potential to introduce pollutants into the stormwater system. The degree to which additional pollutants could be introduced to the Project Site during operation would be reduced compared to the Project due to the reduction in the uses that would be developed. In addition, implementation of County LID requirements, inclusive of stormwater BMPs similar to those of the Project to address water quality in stormwater runoff such as catch basins and planter drains would further reduce and treat potential pollutants in stormwater runoff. Thus, operational impacts on surface water quality would be less than significant, and would be less than the less than significant impacts of the Project.

(3) Groundwater

With regard to groundwater hydrology, the Reduced Project Alternative would require a similar volume of excavated soil and a similar maximum depth of excavation compared with the Project. In addition, the Reduced Project Alternative would result in a similar net increase in the amount of impervious surfaces on-site as compared to the Project. Therefore, as with the Project, development of this Alternative is not expected to encounter groundwater beneath the Project Site, which would require temporary or permanent dewatering operations. Therefore, impacts to groundwater hydrology during construction and operation of Alternative 2 would be less than significant and similar to the less than significant impacts of the Project.

Regarding groundwater quality, hazardous materials, such as fuels, paints, solvents, and concrete additives could be used during on-site grading and building construction, and would therefore require proper management and, in some cases, disposal. The management of any resultant hazardous wastes could increase the opportunity for hazardous materials releases into groundwater. As with the Project, the Reduced Project Alternative would comply with all applicable federal, state, and local requirements concerning the handling, storage, and disposal of hazardous waste, which would reduce the potential for construction activities to release contaminants into groundwater that could affect existing contaminants, expand the area or increase the level of groundwater contamination, or cause a violation of regulatory water quality standards at an existing production well. Additionally, similar to construction, any surface handling of hazardous materials during operation would involve small quantities and would be handled and stored in accordance with manufacturers' specifications and applicable regulations, thereby resulting in a negligible potential impact to groundwater quality. Therefore, as with the Project, impacts with respect to groundwater water quality would be less than significant under Alternative 2. However, such impacts would be less than those of the Project due to the reduction in construction activities and overall development.

h. Land Use and Planning

Land use consistency impacts under the Reduced Project Alternative would be generally similar to those of the Project due to similarities in the development proposals. As such, the Reduced Project Alternative would be consistent with SCAG's regional plans, the County General Plan, and the County Code to the same extent as the Project. Therefore, impacts related to land use consistency would be less than significant and similar to the less than significant impacts of the Project.

i. Noise

(1) Construction

Under this Alternative, the overall amount of site preparation and building construction would be less compared to the Project due to the decrease in square footage to be developed. Therefore, noise and vibration impacts at sensitive receptors would be less on a daily basis, as the intensity and not the duration of these activities would decrease compared to the Project. Similar to the Project, construction of this Alternative would result in less than significant construction noise and vibration impacts. Construction-related noise and vibration impacts would be reduced when compared with the Project.

(2) Operation

This Alternative would include on-site noise sources that would produce noise levels that would be generally similar to those that would occur under the Project, except for additional noise sources associated with the 299-seat theatre. In addition, this Alternative would reduce the number of trips during a peak day in comparison to the Project. Furthermore, the Reduced Project Alternative would implement the same project design features as the Project, as applicable. Thus, as with the Project, noise impacts under this Alternative would be less than significant. However, such impacts would be reduced as compared to the Project.

j. Public Services

(1) Fire Protection

The types of construction activities required for the Reduced Project Alternative would be similar to the Project, although the extent of construction activities would be reduced. Accordingly, while construction-related traffic on adjacent streets which could temporarily interfere with local and on-site emergency response would be similar to the Project on a peak day, such traffic would be reduced throughout the entire duration of the construction period as compared to the Project. In addition, as with the Project, construction traffic management plans would be implemented to ensure that adequate emergency access is maintained to the Project Site and neighboring uses at all times. Further, similar to the Project, construction activities would comply with applicable codes and ordinances relating to fire safety practices. As such, construction impacts on fire protection and emergency medical services would be less than significant under this Alternative, and less than the less than significant impacts of the Project.

Like the Project, the Reduced Project Alternative does not include the development of any new residential uses and, as such, would not increase the permanent residential

population within the service area of Fire Station No. 76. In addition, while this Alternative would generate an increase in the on-site population associated with the additional seats and events to be provided within the Flex Space as well as the proposed hiking trail, the Reduced Project Alternative would involve a reduced floor area and reduced on-site population in comparison to the Project from removal of the 299-seat theatre. Notwithstanding, similar to the Project, compliance with applicable regulatory requirements under this Alternative would ensure that adequate fire prevention features would be provided that would reduce the demand for firefighting services. Similarly, while the additional traffic generated by this Alternative could potentially affect emergency response, the additional traffic would be reduced relative to the Project and would not substantially impact response times or emergency vehicle access, particularly given significant traffic impacts would not occur. Further, as this Alternative would implement the same onsite fire water system improvements as the Project, the Reduced Project Alternative would also meet the fire flow requirements set forth by the County Fire Department and LAFD. Given the Project Site's location in a Very High Fire Hazard Severity Zone, Alternative 2 would be required to comply with all applicable City and County requirements regarding construction, access, water mains, fire hydrants, fire flows, and brush clearance for this zone, similar to the Project. Overall, impacts to fire protection and emergency medical services from Alternative 2 would be less than significant and less as compared to the Project.

(2) Police Protection

As previously described, the types of construction activities required for Alternative 2 would be similar to the Project, although the extent of construction activities would be reduced due to the reduction in development under this Alternative. Therefore, construction-related traffic that could temporarily interfere with local and on-site emergency response would be reduced throughout the entire duration of the construction period as compared to the Project. In addition, as with the Project, construction traffic management plans would be implemented to ensure that adequate emergency access is maintained to the Project Site and neighboring uses at all times. Furthermore, the Reduced Project Alternative would implement the same project design features as the Project regarding the implementation of security measures during construction. Therefore, as with the Project, construction-related impacts to police protection services would be less than significant. However, such impacts would be less than under the Project due to the reduced development.

Similar to the Project, Alternative 2 would not include the development of any residential uses and, as such, would not increase the permanent residential population within the service area of the Parks Bureau South Zone or the Hollywood Community Police Station. In addition, while this Alternative would generate an increase in the on-site population associated with the additional seats and events to be provided within the Flex Space as well as the proposed hiking trail, the Reduced Project Alternative would involve a

reduced floor area and reduced on-site population in comparison to the Project from removal of the 299-seat theatre. Alternative 2 would also implement the same project design features which would serve to reduce the potential for criminal activities and assist law enforcement efforts. Furthermore, while the additional traffic generated by this Alternative could potentially cause delays in law enforcement response times, the additional traffic would be reduced relative to the Project and would not substantially impact response times or emergency vehicle access, particularly given significant traffic impacts would not occur. Therefore, impacts related to police protection services would be less than significant under Alternative 2 and less than the less than significant impacts of the Project.

k. Traffic, Access, and Parking

(1) Construction

As with the Project, construction of the Reduced Project Alternative would generate additional trips from heavy-duty construction equipment, haul trucks, and construction worker trips. However, the overall amount of building construction would be reduced as compared to the Project. Thus, the number of construction-related trips (workers and trucks) would be reduced as compared to the Project. In addition, as with the Project, this Alternative would include implementation of a Construction Management Plan to manage construction-related traffic. The Reduced Project Alternative would also not require the relocation or removal of transit stops in the vicinity of the Project Site or impede emergency, bicycle, and pedestrian access. Additionally, as with the Project, parking for construction workers and employees would be provided on-site. Overall, construction-related traffic, access, and parking impacts under the Reduced Project Alternative would be less than significant, and less than those of the Project.

(2) Operation

As the Reduced Project Alternative would not include the 299-seat theatre, the frequency of events and associated traffic would be reduced under this Alternative in comparison to the Project. It is noted however that during the weekday morning commuter peak period between 7:00 A.M. to 10:00 A.M. and the weekday evening peak period between 6:00 P.M. to 9:00 P.M., the Reduced Project Alternative would generate a similar amount of traffic as the number of employees commuting during the weekday morning peak period would be the same as under the Project and since the Project would stagger start times for events held in the Amphitheatre and the 299-seat theatre during the weekday evening peak period. The amount of traffic generated during the remaining peak times (weekday afternoon, Saturday midday, and Saturday evening) would be reduced compared to the Project. Therefore, overall operational impacts with regard to traffic, access, and parking would be reduced compared to the Project but would remain less than significant.

I. Utilities and Service Systems

(1) Water

Like the Project, construction activities associated with the Reduced Project Alternative would generate a short-term demand for water. This demand would be reduced compared to the Project due to the reduction in construction activities. Therefore, as with the Project, impacts on water supply and infrastructure associated with short-term construction activities would be less than significant and less than those of the Project.

As with the Project, operation of Alternative 2 would generate an increased demand for water relative to existing conditions. Based on the reduction in total development and population associated with events within the 299-seat theatre, water demand for this Alternative would be less than that of the Project. In addition, Alternative 2 would implement the same water conservation measures as the Project. Therefore, like the Project, this Alternative's estimated net water demand would be within LADWP's available and projected water supplies for normal, single-dry, and multi-dry years through the year 2035. The Reduced Project Alternative would also include implementation of the same water infrastructure improvements as the Project. Therefore, impacts to water supply and infrastructure under Alternative 2 would be less than significant and less than the less than significant impacts of the Project.

(2) Energy

Like the Project, construction activities associated with Alternative 2 would generate a short-term demand for electricity to operate construction equipment and light construction activities, if necessary. However, given the reduced level of construction, the demand for electricity would be reduced compared to the Project. The Reduced Project Alternative would implement the same infrastructure improvements as the Project to supply electricity to the proposed uses. As the construction of new buildings and infrastructure typically does not involve the consumption of natural gas, no natural gas would be consumed during construction of this Alternative, similar to the Project. Overall, impacts on energy supply and infrastructure associated with short-term construction activities would be less than significant and less than those of the Project, which would also be less than significant.

As with the Project, operation of Alternative 2 would generate an increased demand in electricity and natural gas relative to existing conditions. However, this demand would be reduced compared to the Project given the elimination of the 299-seat theatre and associated events and visitors. Therefore, as with the Project, impacts on energy supply and infrastructure would be less than significant. Such impacts would be less than those of the Project.

3. Comparison of Impacts

As evaluated above, the Reduced Project Alternative would reduce the Project's impacts with regard to aesthetics, light, and glare; air quality; greenhouse gas emission; surface water quality and groundwater quality; noise; public services; traffic, access, and parking; and utilities and service systems. However, as with the Project, such impacts would remain less than significant when compared to the applicable significance thresholds. Impacts associated with views; biological resources; cultural resources; geology and soils; surface water hydrology and groundwater hydrology; and land use and planning would be similar to those of the Project.

4. Relationship of the Alternative to Project Objectives

With implementation of the previously approved Amphitheatre improvements as well as the Amphitheatre rehabilitation improvements proposed as part of the Project, the Reduced Project Alternative would meet the Project's objective to preserve the historic integrity of the Amphitheatre by providing improvements necessary to respond to damage from water intrusion, soil erosion, and structural decay, and ensure its future viability as a cultural and historical resource for the communities of Los Angeles County. Similarly, this Alternative would support the objective to provide operational improvements for the historic outdoor Amphitheatre that includes modern technical infrastructure and performing arts technology and amenities to support world class theatrical and cultural experiences for patrons and program participants while providing improved access to the Ford Theatres and its canyon park setting as a public cultural and recreational destination. Furthermore, since the Reduced Project would include the development of new plaza areas, the proposed restaurant, and structured parking, this Alternative would realize the following Project objectives: enhance patron pre-show and post-show experience by providing plaza areas and support functions for meeting, dining and picnicking, while enabling visits of variable lengths by the creation of non-stacked parking to ease ingress and egress; and further the Ford's capacity for community building by creating new small and medium interstitial spaces and opportunities for artists, audiences, and the public to interact, dialogue, and find meaning and expression through the arts on the Project Site.

The Reduced Project Alternative would also develop a Transit Center and include pedestrian and vehicular circulation improvements and, as such, would achieve the objective to create pedestrian and vehicular circulation access that is integrated with a transit center and sufficient on-site parking so as to provide for improved and safer patron arrival and departures. In addition, as this Alternative would include a hiking trail, Alternative 2 would meet the Project objective to enhance the Ford Theatres' role as a County Regional Park by increasing public access to the entire site, integrating passive

recreational opportunities, and encouraging visitors to experience the natural landscape and views or surrounding iconic landmarks from a formal trail within the park boundary. Further, since the Reduced Project Alternative would include the installation of an enhanced sound wall, Alternative 2 would also support the objective to mitigate noise pollution from the adjacent Hollywood Freeway to provide a more pastoral experience focused on the stage and preserve audience views of the natural landscaped canyon from inside the Amphitheatre. Additionally, with development of the Ford Terrace, the Reduced Project Alternative would provide for improved operation and maintenance relating to stage logistics including set loading and unloading and set staging areas in close proximity to the Amphitheatre. Alternative 2 would further include development of the proposed offices and, as such, would support the objective to provide on-site accessible modern office space to accommodate daily personnel and improve communication and interaction of staff with the arts community. The Reduced Project Alternative would also disturb the same general area as the Project and, as such, Alternative 2 would meet the Project objective to provide site improvements that are focused on areas of the site that have been previously developed and preserve the canyon setting of the Project Site.

However, without the development of the 299-seat theatre proposed under the Project, the Reduced Project Alternative would not fully meet the objective to support the development of Los Angeles County-based artists, arts organizations and arts producers that represent diverse performing arts genres, disciplines, and communities by providing an on-site natural progression of appropriately-sized enclosed rehearsal and performing arts spaces which can be used at the same time to expand creative capacity, create new work, and increase audiences. Similarly, the Reduced Project Alternative would only partially meet the Project objective to repurpose the areas of the Ford Theatres currently used for on-grade parking to meet existing critical program needs of the regional arts ecosystem, including a much needed mid-size theatre space and low- to no-cost, accessible flexible spaces for rehearsals and performances year-round for artists, particularly dance and theatre groups, which do not have sufficient right-sized rehearsal and performance spaces in Los Angeles County.

Overall, Alternative 2, the Reduced Project Alternative, would meet most of the Project objectives and would partially meet the remaining objectives. However, without providing a key component of the Project, the Reduced Project Alternative would not achieve the Project's underlying purpose to enhance on-site programs that support the work of County of Los Angeles artists and arts organizations by offering programs that meet the specialized needs of a broader cross section of the regional arts community, including emerging theatre, dance, and music ensembles and multi-disciplinary collaborations; to expand opportunities for diverse County residents to come together by creating new spaces and programs that better serve the community; and to ensure the future of the Amphitheatre as an active and relevant historic resource.

VI. Alternatives

C. Alternative 3: Simultaneous Event Schedules

1. Description of the Alternative

The Simultaneous Event Schedules Alternative would include the development of the same components as the Project but with long term flexibility in the scheduling of events within the Amphitheatre and proposed 299-seat theatre. Specifically, under Alternative 3, events held in the Amphitheatre, the 299-seat theatre, and the Flex Space would be able to have simultaneous events with concurrent start times whereas under the Project, events held in the Amphitheatre and the 299-seat theatre would have staggered start times of at least 45 minutes after 6:00 P.M. on weekday evenings to reduce traffic impacts. As with the Project, Alternative 3 would comprise the following: (1) rehabilitation of certain portions of the existing Amphitheatre; (2) the Ford Terrace, which would include a two-story structure with one level of office space and lower-level concessions area and a raised plaza deck above a service level; (3) the Ford Plaza, which would be set atop a new three-level parking structure and would feature a restaurant, a 299-seat theatre, a new box office, a conference room, and offices and visitor amenities; (4) the Transit Center, which would include a designated area for bus and valet drop-off, a new three-level parking structure, 99-seat Flex Space, and maintenance facility; and (5) a 0.75-mile hiking trail. These components would be developed within the Project Site in the same manner as proposed under the Project described in Section II, Project Description, of this Draft EIR. The estimated increases in annual events and attendance projected to occur under the Project would also remain under this Alternative.

2. Environmental Impact Analysis

a. Aesthetics, Views, Light, and Glare

(1) Aesthetics

During construction of Alternative 3, the visual appearance of the Project Site would be altered due to the removal of existing buildings, surface parking areas, and landscaping. Other construction activities, including site preparation and grading, the staging of construction equipment and materials, and the construction of foundations, new structures, and outdoor open space areas would also alter the visual quality of the Project Site. As the overall amount of building construction and associated construction activities would be

similar to the Project, temporary visual quality impacts during construction would be similar to the Project. Therefore, as with the Project, impacts to aesthetics during construction would be less than significant. Such impacts would be similar to those of the Project.

As described above, this Alternative would develop the same components as the Project. These components would be developed within the Project Site in the same manner as proposed under the Project. Therefore, as with the Project, development of Alternative 3 would not substantially degrade the existing visual character or quality of the Project Site or surrounding area. Therefore, like the Project, impacts related to aesthetics would be less than significant. Such impacts would be similar as compared to the Project.

(2) Views

As Alternative 3 would implement the same components as the Project and in the same manner as the Project, view changes under Alternative 3 would be similar to those of the Project. As such, while Alternative 3 would modify existing public views along Cahuenga Boulevard, Pilgrimage Bridge, and the Hollywood Freeway, the proposed structures would not dominate the viewshed along Cahuenga Boulevard and public views of the Project Site would continue to feature a semi-urban environment with a background of rolling hills, pockets of trees, and landscaping. Therefore, impacts with regard to views under Alternative 3 would be less than significant and similar to those of the Project.

(3) Light and Glare

(a) Construction

As previously described, Alternative 3 would include the same type of uses as the Project and would be developed in a similar manner to the Project. Therefore, like the Project, substantial lighting is not anticipated during construction within the Project Site as most construction activities would occur during daylight hours. In addition, should lighting be required during construction activities occurring in the winter, such use would be temporary and would cease upon completion of construction. Further, Alternative 3 would implement the same project design feature related to construction lighting, which would provide that construction lighting be shielded and/or aimed so that no direct beam illumination would fall outside of the Project Site boundary. Therefore, like the Project, light impacts associated with construction would be less than significant under this Alternative, and such impacts would be similar to those of the Project.

As with the Project, any glare generated during construction of this Alternative would be highly transitory and short-term given the movement of construction equipment and materials within each area of the Project Site. In addition, large surfaces that are usually required to generate substantial glare are typically not an element of construction activities.

Therefore, as with the Project, no significant impact related to construction glare would occur under Alternative 3. As this Alternative would involve the same amount of development as the Project, such impacts would be similar to those of the Project.

(b) Operation

As Alternative 3 would develop the Project Site similar to the Project, this Alternative would also increase light levels within the Project Site and the surrounding area through the introduction of new light sources, including accent lighting to highlight architectural features, landscape elements, and the Project's signage; light boxes on the north parking structure, the new theatre, the restaurant, and the proposed sound wall to illuminate the façades; exterior lighting to provide clear identification of circulation, gathering spaces, parking facilities and for security purposes; and new theatrical lighting within the Amphitheatre. This Alternative would also include implementation of the same project design feature as the Project regarding shielding and aiming to prevent glare and light spill and the upward emition of light. Overall, as with the Project, Alternative 3 would not create a new source of substantial glare which would adversely affect day or nighttime views in the area and impacts with regard to lighting would be less than significant. Such impacts would be similar to those of the Project.

Additionally, like the Project, building materials for this Alternative would be anticipated to include plaster, concrete, metal panels, fritted glass, and cement board. This Alternative would also implement the same project design feature as the Project regarding use of non-reflective exterior windows, glass, and metal and use of a standard low-reflective or non-reflective glazing. The replacement of existing surface parking areas with structured parking similar to the Project would also reduce the potential for daytime glare from windows of parked vehicles. Thus, as with the Project, impacts related to glare under Alternative 3 would be less than significant and such impacts would be similar to those of the Project.

b. Air Quality

(1) Construction

(a) Regional and Localized Air Quality Impacts

As with the Project, construction of this Alternative would generate pollutant emissions through the use of heavy-duty construction equipment and through haul truck and construction worker trips. This Alternative would include the development of the same components as the Project. Therefore, pollutant emissions from construction activities would be the same on a daily basis, as the intensity and the duration of these activities would be the same compared to the Project. Thus, overall construction emissions

generated by this Alternative would be the same as those of the Project over the construction period. Similarly, impacts during maximum conditions, those used for measuring significance, would be the same as those of the Project. As such, like the Project, regional and localized emissions would be less than significant and impacts would be similar to those of the Project.

(b) Toxic Air Contaminants

With respect to construction air toxics, diesel particulate emissions associated with heavy equipment operations during grading and excavation activities represent the greatest potential for TAC emissions. As noted above, the construction emissions generated by this Alternative would be the same as those of the Project over the construction period and thus would result in the same amount of diesel particulate emissions. In addition, as with the Project, there would be no residual emissions after construction and corresponding individual cancer risk. Therefore, like the Project, construction-related air toxic emission impacts of this Alternative would be less than significant and similar to those of the Project.

(c) Odors

As with the Project, this Alternative would have the potential to produce odors during construction associated with the operation of construction equipment, the application of asphalt, the application of architectural coatings and other interior and exterior finishes, and roofing. However, like the Project, any odors produced during construction of this Alternative would dissipate away from the construction area and would be quickly diluted. Thus, as with the Project, impacts associated with objectionable odors during construction would be less than significant and such impacts would be the same under this Alternative compared to the Project.

(2) Operation

(a) Regional and Localized Air Quality Impacts

The simultaneous start times between the Amphitheatre and the 299-seat theatre proposed under this Alternative would not result in a change in the number of daily trips or the estimated increases in annual events and attendance projected to occur under the Project. As vehicular emissions are dependent on the number of daily trips, vehicular sources would result in the same daily pollutant emissions compared to the Project. This Alternative would include the development of the same components as the Project, thus both area sources and stationary sources would result in the same amount of pollutant emissions. As the square footage and daily vehicular trips associated with this Alternative would not change in comparison to the Project, regional operational emissions under this

Alternative would be similar to those of the Project, and like the Project would be less than significant.

As described in Section IV.B, Air Quality, of this Draft EIR, localized operational impacts are determined by the peak hour intersection traffic volumes. As the operational trips during the peak hours associated with this Alternative would not change compared to the Project, localized emissions of carbon monoxide would also remain the same. Since the localized CO hotspot analysis for the Project did not result in any significant localized CO impacts and as traffic volumes would not increase with this Alternative, like the Project, localized impacts would be less than significant under this Alternative and such impacts would be similar to those of the Project.

(b) Toxic Air Contaminants

As set forth in Section IV.B, Air Quality, of this Draft EIR, the primary sources of potential air toxics associated with Project operations would include diesel particulate matter from delivery trucks and to a lesser extent, natural gas equipment. With the same daily trips and square footage, this Alternative would result in the same operational diesel particulate matter emissions associated with increased truck deliveries as the Project. Thus, similar to the Project, this Alternative would result in a less-than-significant air quality impact associated with air toxics and such impacts would be the same compared to the Project.

(c) Odors

As with the Project, this Alternative would not include any uses identified by the SCAQMD as being associated with odors. Therefore, like the Project, potential odor impacts would be less than significant under this Alternative and would be similar to those of the Project.

c. Greenhouse Gas Emissions

As with the Project, this Alternative would incorporate numerous project design features to reduce GHG emissions and would be designed to target the criteria for LEED Certification designation. With consideration of this Alternative's design features to reduce cumulative GHG, this Alternative would emit the same GHG emissions as the Project since this Alternative would not result in a change in the number of daily trips or the estimated increases in annual events and attendance. In addition, this Alternative would have the same project components and thus GHG emissions from energy, water, and solid waste would remain the same. By incorporating energy and vehicle trip reducing features such as designing, constructing, and operating the Alternative to target LEED certification, as with the Project, this Alternative would result in a reduction in GHG emissions from

"business-as-usual" consistent with the goals of the State of California and County of Los Angeles and is considered less than significant. Such impacts would be similar to those of the Project.

d. Biological Resources

As this Alternative would disturb the same area as the Project Site, the Project's potential impacts with regard to plant communities, plant species, wildlife species, wildlife movement, and oak trees would also occur under Alternative 3. To reduce potential impacts to biological resources, this Alternative would implement the same mitigation measures proposed by the Project. Therefore, as with the Project, potential impacts to biological resources under this Alternative would be less than significant with mitigation. Such impacts would be similar to those of the Project.

e. Cultural Resources

(1) Historic Resources

Alternative 3 would disturb the same area as the Project and would include removal of the same structures proposed under the Project. Therefore, as construction activities under this Alternative would be the same as those of the Project, Alternative 3 would not be anticipated to result in a substantial adverse change in the significance of the Ford Theatres as a historic resource. Notwithstanding, similar to the Project, given the fluid nature of architectural designs until the approval of final design plans, impacts with regards to historic resources could be potentially significant. Alternative 3 would implement the same mitigation measure as the Project to ensure the design is consistent with the Secretary of the Interior Standards. Therefore, impacts to historic resources under Alternative 3 would be less than significant with mitigation and similar to the Project's impacts, which would also be less than significant with mitigation.

(2) Archaeological and Paleontological Resources

As previously described, construction activities under this Alternative would be similar to the Project. Therefore, Alternative 3 would result in a similar volume of excavated soil and a similar maximum depth of excavation. As such, the potential for Alternative 3 to uncover subsurface archaeological and paleontological resources would be similar to that of the Project. In the event archaeological and paleontological resources are encountered, this Alternative would be subject to the same mitigation and regulatory requirements as the Project to ensure that the resources are properly recovered and evaluated. As such, impacts relative to archaeological and paleontological resources under Alternative 3 would be similar to those of the Project, which would be less than significant with mitigation.

f. Geology and Soils

The Project Site is located within the seismically active region of Southern California; thus, as with the Project, Alternative 3 would be exposed to certain site-specific geologic hazards (e.g., ground shaking). In addition, as this Alternative would be developed within the same site as the Project and disturb the same general area as the Project, Alternative 3 would be exposed to the same potential hazards associated with liquefaction and lateral spreading, landslides and slope stability, and corrosive soils. As with the Project, this Alternative would be designed and constructed to conform to the current seismic design provisions of the California Building Code and the Los Angeles County Building Code. This Alternative would also implement the same mitigation measures as the Project to address potential impacts from liquefaction and lateral spreading and landslides and slope stability. Therefore, as with the Project, impacts due to strong seismic ground shaking, liquefaction and lateral spreading, and landslides and slope stability would be less than significant with mitigation. Such impacts would be similar to those of the Project. Similarly, with compliance with California Building Code and County Building Code requirements, impacts with regard to corrosive soils would be less than significant, and similar to the Project.

Alternative 3 would involve similar grading and other earth-moving activities during construction, which could result in erosion. With compliance with regulatory requirements and implementation of appropriate BMPs like the Project, potential erosion impacts would be less than significant. Such impacts would be similar to those of the Project.

g. Hydrology, Surface Water Quality, and Groundwater

(1) Hydrology

Construction of Alternative 3 would require onsite demolition, grading, and excavation activities to a similar extent as the Project. Therefore, as with the Project, construction activities under this Alternative would have the potential to temporarily alter existing drainage patterns and flows by exposing the underlying soils and making the Project Site temporarily more permeable. This potential would be similar to that of the Project since building footprints under this Alternative would resemble those of the Project. Similar to the Project, during construction of Alternative 3, runoff would be properly controlled through the implementation of a SWPPP and appropriate BMPs comparable to those proposed as part of the Project. Therefore, construction-related impacts on surface water hydrology under Alternative 3 would be less than significant, and such impacts would be similar to those of the Project.

Additionally, upon buildout, it is estimated that Alternative 3 would result in a similar net increase in the amount of impervious surfaces on-site as compared to the Project due

to the similar building footprints. Like the Project, this Alternative would also implement the County's LID requirements to manage post-construction stormwater runoff, which would reduce the volume of water leaving the Project Site compared to existing conditions. Therefore, impacts to surface water hydrology during operation would be less than significant under Alternative 3 and similar to the less than significant impacts of the Project.

(2) Surface Water Quality

As with the Project, during construction of Alternative 3, exposed and stockpiled soils could be subject to erosion and conveyance into nearby storm drains during storm events. In addition, construction activities such as earth moving, maintenance/operation of construction equipment, and handling/storage/disposal of materials could contribute to pollutant loading in stormwater runoff. On-site watering activities to reduce airborne dust could also contribute to pollutant loading in runoff. The degree to which new pollutants could be introduced to the site during construction would be substantially similar to that of the Project given the similar amount of construction activities. In addition, like the Project, the Alternative 3 would include a site-specific SWPPP that would specify BMPs and erosion control measures to be used during construction to minimize pollution in runoff. Therefore, as with the Project, construction-related impacts on surface water quality would be less than significant and such impacts would be similar to those of the Project.

Similarly, during operation of Alternative 3, stormwater runoff from the Project Site has the potential to introduce pollutants into the stormwater system. The degree to which additional pollutants could be introduced to the Project Site during operation would be substantially similar to that of the Project due to the same uses and amount of development that would be provided. In addition, implementation of the County's LID requirements, inclusive of stormwater BMPs similar to those of the Project to address water quality in stormwater runoff such as catch basins and planter drains, would reduce and treat potential pollutants in stormwater runoff. Thus, operational impacts on surface water quality under this Alternative would be less than significant, and would be similar to the less than significant impacts of the Project.

(3) Groundwater

With regard to groundwater hydrology, Alternative 3 would require a similar volume of excavated soil and a similar maximum depth of excavation compared with the Project. In addition, Alternative 3 would result in a similar net increase in the amount of impervious surfaces on-site as compared to the Project due to the similar building footprints. Therefore, as with the Project, development of this Alternative is not expected to encounter groundwater beneath the Project Site, which would require temporary or permanent dewatering operations. Therefore, impacts to groundwater hydrology during construction

and operation of Alternative 3 would be less than significant and similar to the less than significant impacts of the Project.

Regarding groundwater quality, hazardous materials, such as fuels, paints, solvents, and concrete additives could be used during on-site grading and building construction, and would therefore require proper management and, in some cases, disposal. The management of any resultant hazardous wastes could increase the opportunity for hazardous materials releases into groundwater. As with the Project, the Alternative 3 would comply with all applicable federal, State, and local requirements concerning the handling, storage and disposal of hazardous waste, which would reduce the potential for construction activities to release contaminants into groundwater that could affect existing contaminants, expand the area or increase the level of groundwater contamination, or cause a violation of regulatory water quality standards at an existing production well. Additionally, similar to construction, any surface handling of hazardous materials during operation would involve small quantities and would be handled and stored in accordance with manufacturers' specifications and applicable regulations, thereby resulting in a negligible potential impact to groundwater quality. Therefore, as with the Project, impacts with respect to groundwater water quality would be less than significant under Alternative 3 and such impacts would be similar to the less than significant impacts of the Project.

h. Land Use and Planning

Land use consistency impacts under Alternative 3 would be similar to those of the Project due to similarities in the development proposals. As such, Alternative 3 would be consistent with SCAG's regional plans, the County General Plan, and the County Code to the same extent as the Project. Therefore, impacts related to land use consistency would be less than significant and similar to the less than significant impacts of the Project.

i. Noise

(1) Construction

This Alternative would include the development of the same components as the Project. Therefore, noise and vibration impacts at sensitive receptors would be the same as the intensity and the duration of these activities would be the same compared to the Project. As with the Project, construction of this Alternative would result in less than significant construction noise and vibration impacts, and such impacts would be similar to those of the Project.

(2) Operation

As with the Project, this Alternative would include on-site noise sources that would produce noise levels that would be similar to those that would occur under the Project. As analyzed in Section IV.I, Noise, of this Draft EIR, these on-site noise sources would result in less than significant impacts with implementation of the project design features. Thus, with implementation of the same project design features to be implemented under the Project, noise impacts associated with these on-site noise sources under this Alternative would also be less than significant. Additionally, the simultaneous theatre use under this Alternative would not result in a change to the number of daily trips or the estimated increases in annual events and attendance projected to occur under the Project. As vehicular noise is dependent on the number of daily trips, vehicular noise would result in the same noise level compared to the Project. Overall, operational noise impacts under the Simultaneous Event Schedules Alternative would be less than significant and similar to the Project.

j. Public Services

(1) Fire Protection

The types of construction activities required for Alternative 3 would be similar to the Project due to the similar types and amounts of new development. Accordingly, construction-related traffic which could temporarily interfere with local and on-site emergency response would be similar to the Project. As with the Project, construction traffic management plans would be implemented to ensure that adequate emergency access is maintained to the Project Site and neighboring uses at all times. In addition, similar to the Project, construction would comply with applicable codes and ordinances relating to fire safety practices. As such, construction impacts on fire protection and emergency medical services would be less than significant under this Alternative, and similar to the less than significant impacts of the Project.

Like the Project, Alternative 3 does not include the development of any new residential uses and, as such, would not increase the permanent residential population within the service area of Fire Station No. 76. As this Alternative would develop the same type and amount of uses as the Project, Alternative 3 would generate an increase in the population at the Project Site that would be similar to that of the Project. As with the Project, compliance with applicable regulatory requirements under this Alternative would ensure that adequate fire prevention features would be provided that would reduce the demand for firefighting services. Similarly, while the additional traffic generated by this Alternative could potentially affect emergency response, the additional traffic, which would be similar to the Project, would not substantially impact response times or emergency vehicle access. Further, with implementation of the same onsite fire water system

improvements as the Project, Alternative 3 would also meet the fire flow requirements set forth by the County Fire Department and LAFD. Given the Project Site's location in a Very High Fire Hazard Severity Zone, Alternative 3 would be required to comply with all applicable City and County requirements regarding construction, access, water mains, fire hydrants, fire flows, and brush clearance for this zone, similar to the Project. Overall, impacts to fire protection and emergency medical services from development of Alternative 3 would be less than significant and similar to the less than significant impacts of the Project.

(2) Police Protection

The types of construction activities required for Alternative 3 would be similar to the Project due to the similar types and amounts of new development. Therefore, construction-related traffic that could temporarily interfere with local and on-site emergency response would be similar to the Project. As with the Project, construction traffic management plans would be implemented under Alternative 3 to ensure that adequate emergency access is maintained to the Project Site and neighboring uses at all times. In addition, the Alternative 3 would implement the same project design features as the Project regarding the implementation of security measures during construction. Therefore, as with the Project, construction-related impacts to police protection services would be less than significant and similar to those of the Project.

Like the Project, Alternative 3 would not include the development of any residential uses and, as such, would not increase the permanent residential population within the service area of the Parks Bureau South Zone or the Hollywood Community Police Station. As this Alternative would develop the same type and amount of uses as the Project, Alternative 3 would generate an increase in the population at the Project Site that would be similar to that of the Project. Alternative 3 would implement the same project design features as the Project, which would serve to reduce the potential for criminal activities and assist law enforcement efforts. Furthermore, while additional traffic generated by the Project could potentially cause delays in law enforcement response times, the additional traffic would not substantially impact emergency vehicle access or response times. Therefore, impacts related to police protection services would be less than significant under Alternative 3 and similar to the less than significant impacts of the Project.

k. Traffic, Access, and Parking

(1) Construction

As with the Project, construction Alternative 3 would generate additional trips from heavy-duty construction equipment, haul trucks, and construction worker trips. As the overall amount of building demolition, excavation, and building construction would be the

same as the Project, the number of construction-related trips during these phases would be the same as the Project. In addition, as with the Project, this Alternative would implement a Construction Management Plan to manage construction-related traffic. Similar to the Project, the Simultaneous Event Schedules Alternative would also not require the relocation or removal of transit stops in the vicinity of the Project Site or impede emergency, bicycle, and pedestrian access. Additionally, as with the Project, parking for construction workers and employees would be provided on-site. Overall, construction-related traffic, access, and parking impacts under the Simultaneous Event Schedules Alternative would be less than significant, and similar to those of the Project.

(2) Operation

As discussed above, the Simultaneous Event Schedules Alternative would develop the same types and amount of uses as the Project. In addition, the estimated increases in annual events and attendance projected to occur under the Project would also remain under this Alternative. However, under the Simultaneous Event Schedules Alternative, events held in the Amphitheatre, the 299-seat theatre, and the Flex Space would be able to have simultaneous events with concurrent start times whereas under the Project, events held in the Amphitheatre and the 299-seat theatre would have staggered start times on weekday evenings. Therefore, while this Alternative would generate the same amount of overall traffic and transit trips as the Project, as well as the same demand for parking, the trips generated by this Alternative during the evening peak period between 6:00 P.M. to 9:00 P.M., would be greater than the Project. Accordingly, the traffic impacts to study intersections during this peak period would be greater than the Project. Specifically, the Simultaneous Event Schedules Alternative would result in one significant traffic impact during the weekday evening peak period at Intersection No. 6: US-101 Northbound Off-ramp & Cahuenga Boulevard North. Therefore, impacts with respect to intersection level of service would be significant and unavoidable under the Simultaneous Event Schedules Alternative and such impacts would be greater compared to the Project. Impacts regarding congestion management program facilities, access and circulation, and parking would be less than significant and similar to the Project.

I. Utilities and Service Systems

(1) Water

Like the Project, construction activities associated with Alternative 3 would generate a short-term demand for water. This demand would be similar to the Project due to the similar amount of construction activities and grading and dust control that would be required. Therefore, as with the Project, impacts on water supply and infrastructure associated with short-term construction activities would be less than significant under Alternative 3. Such impacts would be similar to those of the Project.

As with the Project, operation of Alternative 3 would generate an increased demand for water relative to existing conditions. As Alternative 3 would construct the same types and amounts of new uses as the Project, this Alternative would result in the same increase in water demand as the Project. Alternative 3 would also implement the same water conservation measures as the Project. Therefore, like the Project, this Alternative's estimated net water demand would be within LADWP's available and projected water supplies for normal, single-dry, and multi-dry years through the year 2035. Additionally, Alternative 3 would include implementation of the same water infrastructure improvements as the Project. Therefore, impacts to water supply and infrastructure under Alternative 3 would be less than significant and similar to the less than significant impacts of the Project.

(2) Energy

Like the Project, construction activities associated with Alternative 3 would generate a short-term demand for electricity. This demand would be similar to the Project due to the similar amount of construction activities that would be required. Alternative 3 would also implement the same infrastructure improvements as the Project to supply electricity to the proposed uses. As the construction of new buildings and infrastructure typically does not involve the consumption of natural gas, no natural gas would be consumed during construction of this Alternative, similar to the Project. Overall, impacts on energy supply and infrastructure associated with short-term construction activities would be less than significant under Alternative 3 and similar to the less than significant impacts of the Project.

As with the Project, operation of Alternative 3 would generate an increased demand in electricity and natural gas relative to existing conditions. As Alternative 3 would construct the same types and amounts of new uses as the Project, this Alternative would result in the same increase in energy consumption as the Project. Therefore, similar to the Project, impacts on energy supply and infrastructure under Alternative 3 would also be less than significant. Such impacts would be similar to those of the Project.

3. Comparison of Impacts

As analyzed above, the impacts of Alternative 3 would be similar to the Project for all environmental issues except traffic. Specifically, impacts associated with aesthetics, views, light, and glare; air quality; greenhouse gas emissions; biological resources; cultural resources; geology and soils; hydrology, surface water quality, and groundwater; land use and planning; noise; public services; and utilities and service systems would be similar under this Alternative when compared with the Project. However, as Alternative 3 would provide for simultaneous events with concurrent start times within the Amphitheatre and the proposed 299-seat theatre, which would create significant impacts to traffic, impacts

regarding intersection levels of service would be greater under this Alternative as compared to the Project.

4. Relationship of the Alternative to Project Objectives

The types and amounts of uses proposed under Alternative 3 would be the same as under the Project. As such, this Alternative would meet the Project's underlying purpose to enhance on-site programs that support the work of County of Los Angeles artists and arts organizations by offering programs that meet the specialized needs of a broader cross section of the regional arts community, including emerging theatre, dance, and music ensembles and multi-disciplinary collaborations; to expand opportunities for diverse County residents to come together by creating new spaces and programs that better serve the community; and to ensure the future of the Amphitheatre as an active and relevant historic resource. This Alternative would also achieve the Project objectives that support this underlying purpose.

Specifically, with implementation of the previously approved Amphitheatre improvements as well as the Amphitheatre rehabilitation improvements proposed as part of the Project, Alternative 3 would meet the Project's objective to preserve the historic integrity of the Amphitheatre by providing improvements necessary to respond to damage from water intrusion, soil erosion, and structural decay, and ensure its future viability as a cultural and historical resource for the communities of Los Angeles County. Similarly, this Alternative would support the objective to provide operational improvements for the historic outdoor Amphitheatre that includes modern technical infrastructure and performing arts technology and amenities to support world class theatrical and cultural experiences for patrons and program participants while providing improved access to the Ford Theatres and its canyon park setting as a public cultural and recreational destination. Additionally, as Alternative 3 would include the development of the proposed facilities, this Alternative would meet the objective to support the development of Los Angeles County-based artists, arts organizations and arts producers that represent diverse performing arts genres, disciplines, and communities by providing an on-site natural progression of appropriately-sized enclosed rehearsal and performing arts spaces which can be used at the same time to expand creative capacity, create new work, and increase audiences. Similarly, Alternative 3 would achieve the Project objective to repurpose the areas of the Ford Theatres currently used for on-grade parking to meet existing critical program needs of the regional arts ecosystem, including a much needed mid-size theatre space and low- to no-cost, accessible flexible spaces for rehearsals and performances year-round for artists, particularly dance and theatre groups, which do not have sufficient right-sized rehearsal and performance spaces in Los Angeles County.

Furthermore, since Alternative 3 would include the development of new plaza areas, the proposed restaurant, and structured parking, this Alternative would support the following Project objectives: enhance patron pre-show and post-show experience by providing plaza areas and support functions for meeting, dining and picnicking, while enabling visits of variable lengths by the creation of non-stacked parking to ease ingress and egress; and further the Ford's capacity for community building by creating new small and medium interstitial spaces and opportunities for artists, audiences, and the public to interact, dialogue, and find meaning and expression through the arts on the Project Site.

Alternative 3 would also develop a Transit Center and include pedestrian and vehicular circulation improvements and, as such, would achieve the objective to create pedestrian and vehicular circulation access that is integrated with a transit center and sufficient on-site parking so as to provide for improved and safer patron arrival and departures. In addition, as this Alternative would include a hiking trail, Alternative 3 would meet the Project objective to enhance the Ford Theatres' role as a County Regional Park by increasing public access to the entire site, integrating passive recreational opportunities, and encouraging visitors to experience the natural landscape and views or surrounding iconic landmarks from a formal trail within the park boundary. Further, since Alternative 3 would include the installation of an enhanced sound wall, this Alternative would also support the objective to mitigate noise pollution from the adjacent Hollywood Freeway to provide a more pastoral experience focused on the stage and preserve audience views of the natural landscaped canyon from inside the Amphitheatre. Additionally, with development of the Ford Terrace, the Alternative 3 would provide for improved operation and maintenance relating to stage logistics including set loading and unloading and set staging areas in close proximity to the Amphitheatre. Alternative 3 would further include development of the proposed offices and, as such, would support the objective to provide on-site accessible modern office space to accommodate daily personnel and improve communication and interaction of staff with the arts community. This Alternative would also disturb the same general area as the Project and, as such, Alternative 3 would meet the Project objective to provide site improvements that are focused on areas of the site that have been previously developed and preserve the canyon setting of the Project Site.

VI. Alternatives

D. Environmentally Superior Alternative

Section 15126.6(e)(2) of the CEQA Guidelines indicates that an analysis of alternatives to a project shall identify an Environmentally Superior Alternative among the alternatives evaluated in an EIR. The CEQA Guidelines also state that should it be determined that the No Project Alternative is the Environmentally Superior Alternative, the EIR shall identify another Environmentally Superior Alternative among the remaining alternatives.

A comparative summary of the environmental impacts anticipated under each alternative with the environmental impacts associated with the Project is provided in Table V-1 on page V-6. A more detailed description of the potential impacts associated with each alternative is provided above. Pursuant to Section 15126.6(c) of the CEQA Guidelines, the analysis below addresses the ability of the alternatives to "avoid or substantially lessen one or more of the significant effects" of the Project.

As previously stated, implementation of the Project would not result in significant and unavoidable impacts with regard to the environmental issues evaluated in this Draft EIR. Notwithstanding, of the alternatives analyzed in this Draft EIR, Alternative 1, the No Project/No Build Alternative is considered the Environmentally Superior Alternative as it would reduce most of the less than significant impacts occurring under the Project. However, Alternative 1 would result in greater (but less than significant) impacts to surface water quality and groundwater quality. In addition, as indicated above, this Alternative would not meet most of the objectives established for the Project.

In accordance with the CEQA Guidelines requirement to identify an Environmentally Superior Alternative other than the No Project Alternative, a comparative evaluation of the remaining alternatives indicates that Alternative 2, the Reduced Project Alternative, would be the Environmentally Superior Alternative. As summarized in Table V-1, this Alternative would reduce more of the Project impacts compared to Alternative 3. However, as described above, without the development of the proposed 299-seat theatre, this Alternative would not meet the underlying purpose of the Project. Additionally, as with the Alternatives evaluated herein, the Project also would not result in significant and unavoidable impacts with regard to the environmental issues evaluated in this Draft EIR.